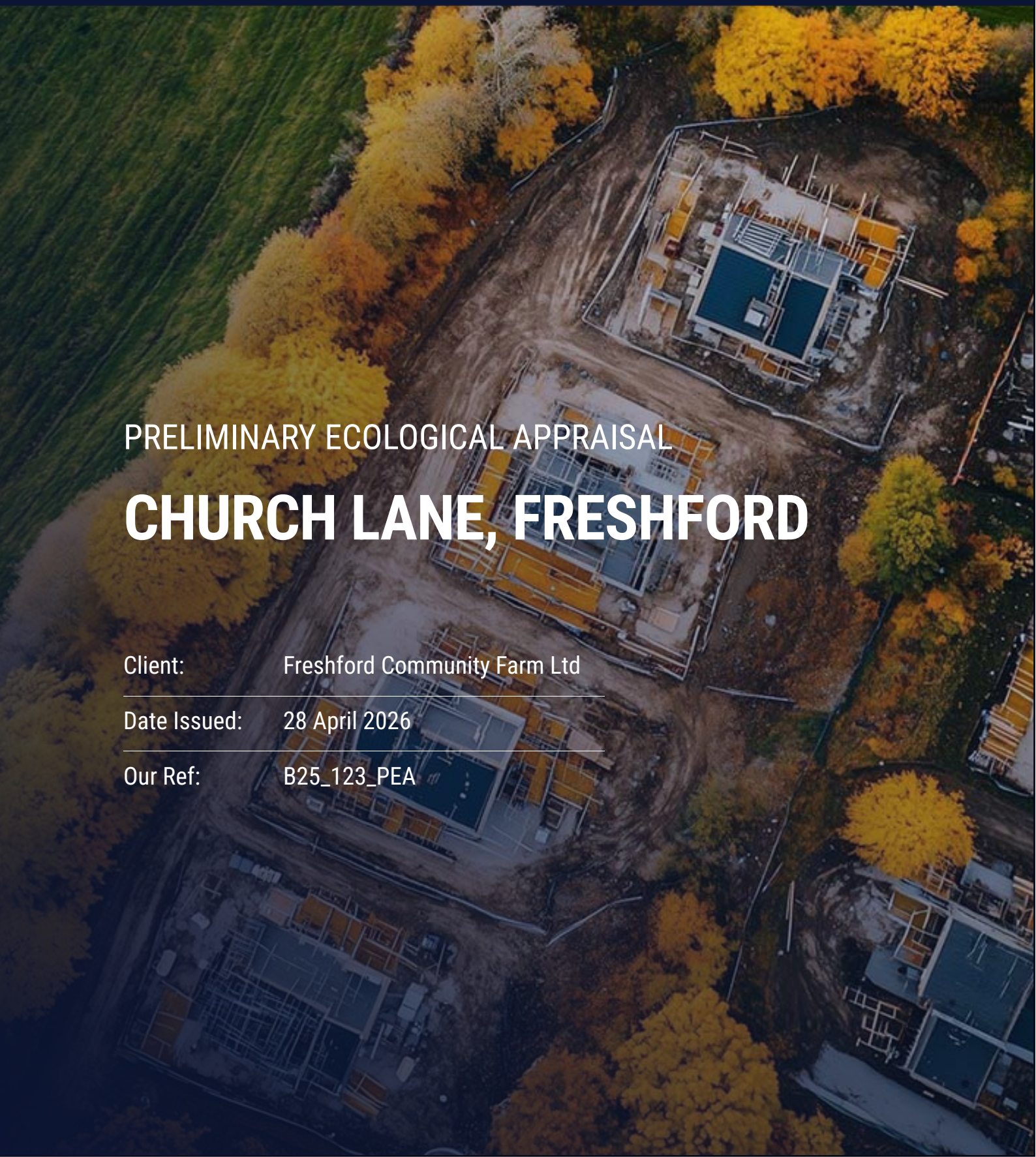
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PRELIMINARY ECOLOGICAL APPRAISAL

CHURCH LANE, FRESHFORD

Client:	Freshford Community Farm Ltd
Date Issued:	28 April 2026
Our Ref:	B25_123_PEA

Document Issue Record

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1. INTRODUCTION

1.1. Scope and Purpose of the Report

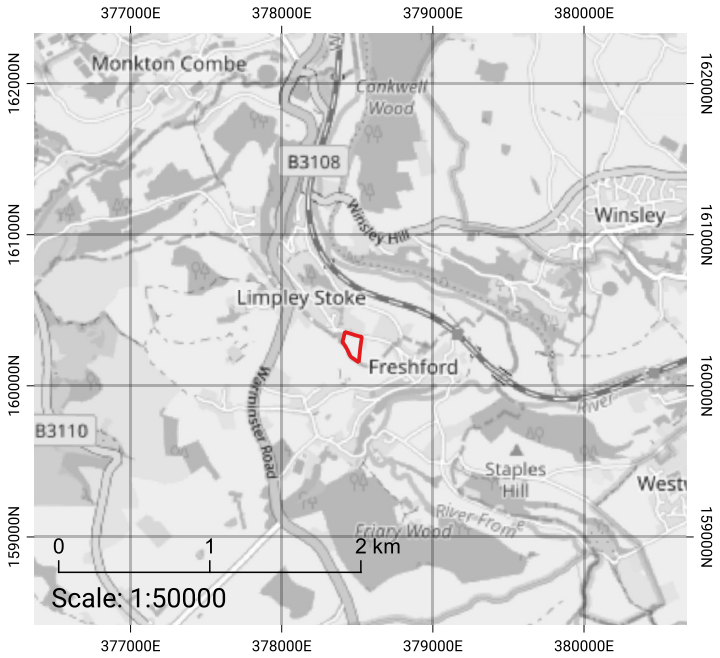
1.1.1 Bengrove Ltd was commissioned Freshford Community Farm Ltd to undertake a Preliminary Ecological Appraisal of a parcel of land off Church Lane, between Freshford and Limpley Stoke (hereafter referred to as the 'Site'). The applicants are seeking planning permission to create a community farm consisting of no-dig beds, polytunnels and associated buildings and infrastructure. The Site location is shown in the **Site Location Plan**, the OS grid reference for the centre of the Site is ST 78471 60296 and the nearest postcode is BA2 7WD.

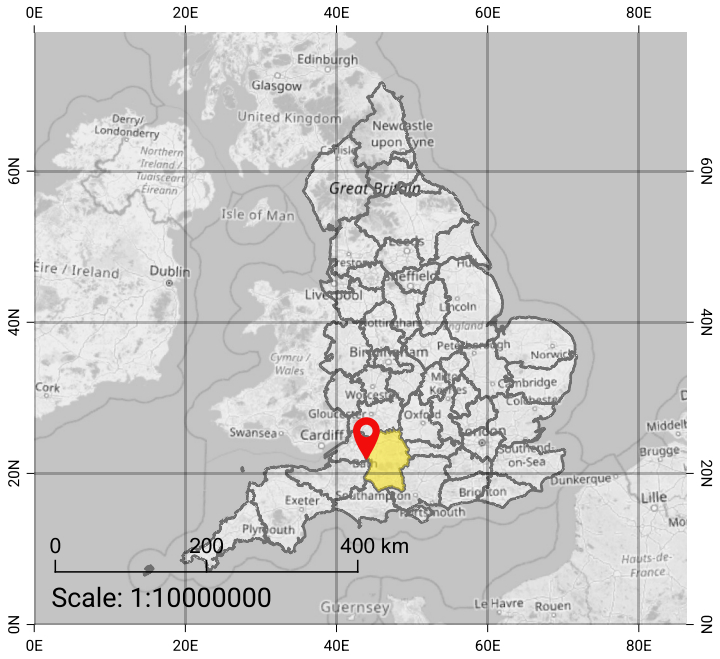
1.1.2 The purpose of this report is to:

- provide an assessment of the ecological importance of the site's habitats;
- set out whether any protected or notable species are likely to use the site;
- determine whether any further ecological surveys should be completed to support the planning application;
- confirm whether the application will be subject to the biodiversity net gain requirement;
- explain how relevant planning policies apply to the site; and
- verify which ecological matters should form material considerations for the planning application.

1.1.3 The report follows the methods set out in the Guidelines for Preliminary Ecological Appraisal produced by the Chartered Institute of Ecology and Environmental Management (CIEEM, 2017).







Project: Church Lane, Freshford
Client: Freshford Community Farm Ltd
Date: 29-04-2026
Author: Peter Stockting
Made with: QGIS 3.44.2-Solothurn

Site Location Plan

Red_Line_Boundary

Grid Reference: ST78466028
Latitude: 51.340704
Longitude: -2.309236
Nearest postcode: BA2 7GQ
LNRS Authority: Wiltshire Council

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2. LEGISLATION AND POLICY

Wildlife in the UK is protected through various pieces of legislation and planning policy. This forms a framework through which projects are assessed for their impacts on habitats and species and the background against which recommendations are made for the grant or refusal of planning permission.

2.1. Legislation

2.1.1 The main pieces of legislation protecting wildlife in the UK that are relevant to this project are:

- The *Conservation of Habitats and Species Regulations 2017* (as amended); and the *Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019*. These regulations cover the protection of European designated sites (the Natura 2000 Network, made up of Special Areas of Conservation and Special Protection Areas); and European Protected Species listed in Annex IV to the Habitats Directive, whose natural range includes any area in Great Britain.
- *The Wildlife and Countryside Act 1981* (as amended); the *Countryside and Rights of Way Act 2000*; and the *Natural Environment and Rural Communities Act (2006)*. Together these acts provide specific protections for a number of UK species (with some overlap with the species listed on Annex IV) and list invasive species for which there are legal provisions; nationally designated sites including Sites of Special Scientific Interest (SSSI); and set out the species of principle importance for conservation (Priority Species).
- *The Environment Act 2021* which inserted *Schedule 7A* into the *Town and Country Planning Act 1990* making it mandatory for all developments (with some exceptions) to deliver at least 10% net biodiversity gain. The Acts and related regulations make it a requirement that planning applications are submitted with details of the biodiversity value of onsite habitats.

2.2. Planning and Infrastructure Act 2025

2.2.1.1 This Act received royal assent on 18th December 2025. Part 3 of the Act introduced Environmental Delivery Plans (EDPs) and the Nature Restoration Fund (NRF). EDPs are mapped areas defined by Natural England that will:

- identify potential harms on protected sites and species from developments;
- set out conservation measures that will improve the status of the affected feature; and
- demonstrate how the plan results in an overall improvement.

2.2.2 Natural England is currently drafting 16 EDPs for nutrient pollution from development affecting protected sites (such as nitrogen impacts on the River Avon SAC), and 7 EDPs for great crested newts (GCN), for development and infrastructure in England where GCN are present.

2.2.3 Where a development will have an impact on a protected site or species within its defined EDP area, the developer may pay into the NRF, if accepted by Natural England. Payment into this fund will likely predominantly be voluntary.

2.2.4 The government has also stated Biodiversity Net Gain does not fall within the scope of this Act, and that the NRF should not have a substantive impact on the operation of BNG in practice.

2.3. National Planning Policy Framework

2.3.1 The National Planning Policy Framework (NPPF) – last updated 7th February 2025 – sets out the government's planning policy for England. Chapter 15 sets out the policies relating to the natural environment, and the elements of particular relevance are:

2.3.2 **Paragraph 187**: Sets out that planning decisions should contribute to and enhance the natural and local environment by:

a) Protecting and enhancing [...] sites of biodiversity [...] value (in a manner commensurate with their statutory status or identified quality in the development plan);
b) Recognising the intrinsic character and beauty of the countryside;
c) 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;

2.3.3 **Paragraph 193**: Sets out that, when determining planning applications, local planning authorities should apply the following principles:

a) If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
b) Development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

c) Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and
d) Development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

2.4. Biodiversity Net Gain

2.4.1 The project will be within the scope of the requirement to deliver at least 10% biodiversity net gain, introduced by *Schedule 7A* of the *Town and Country Planning Act 1990* (inserted by the *Environment Act 2021*). Any such planning permission would be granted subject to the condition that the biodiversity gain objective is met (the pre-commencement biodiversity gain condition). The planning application would need to be submitted with the following:

- Baseline pre-development habitat plan;
- Completed statutory biodiversity net gain metric setting out the pre-development baseline habitat value;

2.5. Local Plan

2.5.1 The land falls within the administrative area covered by the Wiltshire Council Local Planning Authority. The current Development Plan comprises:

- Wiltshire Core Strategy (adopted 20th January 2015), including policies saved from former local district plans. Biodiversity and Geodiversity policies:
  - Core Policy 50
  - Draft Local Plan Policy 88
- Chippenham Site Allocations Plan
- Wiltshire Housing Site Allocations Plan
- Minerals and Waste Plans
- 'Made' Neighbourhood Plans

2.5.2 Core Policy 50 is the current policy, which requires development to deliver a measurable net gain, but the Local Plan review is targeting a Biodiversity Net Gain of 20%, above the 10% required by current legislation.

2.6. Local Nature Recovery Strategy

2.6.1 Local Nature Recovery Strategies (LNRS) have been designed to reverse biodiversity decline and restore ecological connectivity across England.

2.6.2 Section 40(2A) of the *Natural Environment and Rural Communities Act 2006* (duty to conserve biodiversity) and Part 6(104-108) of the *Environment Act 2021* (Local nature recovery strategies for England) outline how local authorities must create and adhere to biodiversity priorities that aim to achieve the above, within their respective areas. These priorities should then be outlined within a publicly available local habitat map, which developers and ecologists can use to inform biodiversity action.

2.6.3 The Local Nature Recovery Strategy for Wiltshire and Swindon has now been adopted and published. When completing a statutory metric, the baseline habitats will therefore be set as low strategic significance. Post-development habitats can be set to high strategic significance if:

- The location of the habitat parcel has been mapped in the Local Habitat Map as an area where a potential measure has been proposed to help deliver the priorities of that LNRS; and
- The proposed intervention is consistent with the mapped potential measure in the LNRS for the habitat parcel.

3. METHODS

To understand the Site's ecological function in the wider landscape, a combination of desk-based research and field surveys were used. All areas within the proposed Red Line Boundary could be surveyed, with a full UKHabs Survey completed in April 2026.

3.1. Desk Study

3.1.1 Desktop data were provided by the two Local Records Centres that cover this area: Wiltshire and Swindon Biological Records Centre and Bristol Regional Environmental Records Centre. The data searches were requested within 1km of the site from each records centre, and included records of protected and priority species, invasive non-native species and non-statutory designated sites.

3.1.2 The potential for the project to have adverse impacts on European designated sites – Wetlands of International Importance (RAMSAR); Special Areas of Conservation (SAC); Special Protection Areas (SPA), was assessed using desktop information. There is no fixed distance at which this area of analysis must be set. It need not be so wide as to capture any and all Natura 2000 sites nor all of the land where their qualifying features may be encountered: there is an inverse relationship between the distance from a site and the concentration of qualifying species – a very wide search area would be meaningless.

3.1.3 Given the scale of the project and its location and landscape context, a 5km area of analysis has been adopted as sufficiently broad to capture any Nature 2000 sites whose qualifying features might conceivably use the site on anything more than an occasional basis.

3.1.4 The Government's Multi-Agency Geographic Information for the Countryside (MAGIC) map was used to search for the following protected habitat and species data:

- Sites of Special Scientific Interest (SSSI) within 2km
- National Nature Reserves (NNR) within 2km
- Local Nature Reserves (LNR) within 2km
- Priority Habitats Inventory (a spatial dataset of habitats identified in the UK Biodiversity Action Plan and listed as being of principal importance for the purpose of conserving or enhancing biodiversity, under Section 411 of the *Nature Environment and Rural Communities Act 2006*) within 500m
- Records of Great Crested Newt (*Triturus cristatus*) environmental DNA (eDNA) surveys (2017-2019) for District Level Licensing (updated annually); and
- Records of granted European Protected Species License (EPSL) applications.

3.1.5 Spatial data for all of the above (except for the EPSL records) are available under the Open Government Licence (OGL, https://www.nationalarchives.gov.uk/doc/opengovernment-licence/version/3/) via Natural England's ArcGIS REST API services. This service was used in the maps and plans produced for this report, along with 'OS Open Data – Local' shapefiles provided by Ordnance Survey.

3.1.6 To determine the likelihood of Great Crested Newts being present on Site, the following steps were followed:

1) Results from the 500m EPSL licence searches obtained during the data search were checked for records of Great Crested Newts within the wider landscape.
2) The Site's Red Line Boundary was added to QGIS and a 500m buffer created around it.
3) The following data sources were then added to the same project:
    (a) Several shapefile layers taken from Natural England, reproduced under the OGL. Including:
        (i) Great Crested Newts eDNA Pond Surveys for District Level Licensing (England)
        (ii) Surveyed priority ponds (England) – Overview
        (iii) Priority Habitats Inventory (England)
    (b) A georeferenced snip of a 500m buffer around the Site, taken from MAGIC – used to help locate ponds via satellite imagery.
    (c) Historical, Ordnance Survey, 25-Inch maps (1873-1888) of the southwest of England from the National Library of Scotland, available under the CC-BY licence.
    (d) Shapefiles from Ordnance Survey's OpenMap-Local dataset (this provides shapefiles for ponds, rivers, buildings etc), available under the OGL.
4) Using the above sources, the 500m area around the Site was manually searched for any possible waterbodies that could support a population of newts, and point markers created at their locations.
5) Where ponds did fall within 500m of the Site, consideration was then given to any functional barriers to movement across the landscape (flowing water, large roads, urban areas etc). Based on this, the likelihood that newts would use the site was considered.

3.1.7 Whilst they give an indication of habitats and species in the area, the above are not a substitute for field surveys and assessment. For example, where the Priority Habitats Inventory or eDNA records suggest there may be protected habitats or ponds suitable for newts within or adjacent to the Site, they are likely to require field assessment to verify the record.

3.2. Habitat Survey

3.2.1 A full UKHabs survey was carried out on the 10th of April 2026. The survey was carried out by Matthew Davies BSc, MSc, MCIEEM.

3.2.2 The purpose of the survey was to classify the habitats according to the UK Habitat Classification version 2.0[1]. Each of the Site's habitats were mapped and assessed against the criteria in the relevant Statutory biodiversity metric condition assessments sheets.

3.3. Protected Species Scoping

3.3.1 The Site was also assessed for its potential to support legally protected and notable species, based upon the results of the desk study and with reference literature for the relevant species and groups:

- Amphibians (Gent and Gibson, 2003)
- Badgers (Harris et al. 1991; and Roper, 2010);
- Bats (Collins, 2023; Mitchell-Jones, 2004; and Reason, P.F. and Wray, S. 2023)
- Birds (Gilbert et al. 1998; Bibby et al. 2000)
- Dormice (Bright, Morris and Mitchell-Jones, 2006)
- Terrestrial invertebrates (Drake et al. 2007; Kirby, 2001).

3.3.2 The land, and land adjacent within 30m, was searched for badger signs.

3.4. Limitations

3.4.1 The entire site was accessible during the survey, and the site could be thoroughly searched for evidence of protected species.

3.4.2 Botanical surveys are best conducted in the spring and summer months (April-August), making this a suitable survey period sufficient for the purposes of this assessment.

[1] UKHab Ltd (2023). *UK Habitat Classification Version 2.0 (at https://www.ukhab.org)*

4. RESULTS

4.1. European Designated Sites

4.1.1 Areas of higher value for nature conservation in England are protected at various levels: from sites supporting ecological features of European importance to locally important sites. Development projects can have adverse impacts on designated sites directly, or through indirect effects where an important species present at these sites might also rely on the proposed development area. Local designations provide an indication of the habitats and species that are uncommon and valuable in the local area and offer a benchmark of the ecological value of local habitats.

4.1.2 As shown in the **European Designated Sites Plan**, the following European protected sites are within 15km of the Site (there are no Wetlands of International Importance within the zone of influence):

- Bath & Bradford on Avon Bats SAC
- Mells Valley SAC
- Salisbury Plain SAC and SPA

4.1.3 Broadly, they are designated because internationally rare bat and bird species are present in large numbers within these areas, but also for the rare habitats present at these sites.

4.1.4 **The Bath & Bradford on Avon Bats SAC** is comprised of multiple, individual sites that provide hibernation roosts for 15% of the UK's Greater horseshoe (*Rhinolophus ferrumequinum*) population, and small numbers of Bechstein's bat (*Myotis bechsteinii*) in abandoned mines, both of which are Annex II species. These sites also qualify by supporting the Annex II Lesser Horseshoe (*Rhinolophus hipposideros*) bat, although this species is not the primary reason for its designation, like those above.

4.1.5 **The Mells Valley SAC** is designated because it supports an exceptional breeding population of Greater horseshoe bat (*R. ferrumequinum*). It is the maternity site for about 12% of the UK's Greater horseshoe population, a proportion of which also hibernates here. It also qualifies for its important orchid grassland and scrubland habitat type (Semi-natural dry grasslands and scrubland facies on calcareous substrates) and its caves that are closed to the public.

4.1.6 **Salisbury Plain** is afforded two designations:

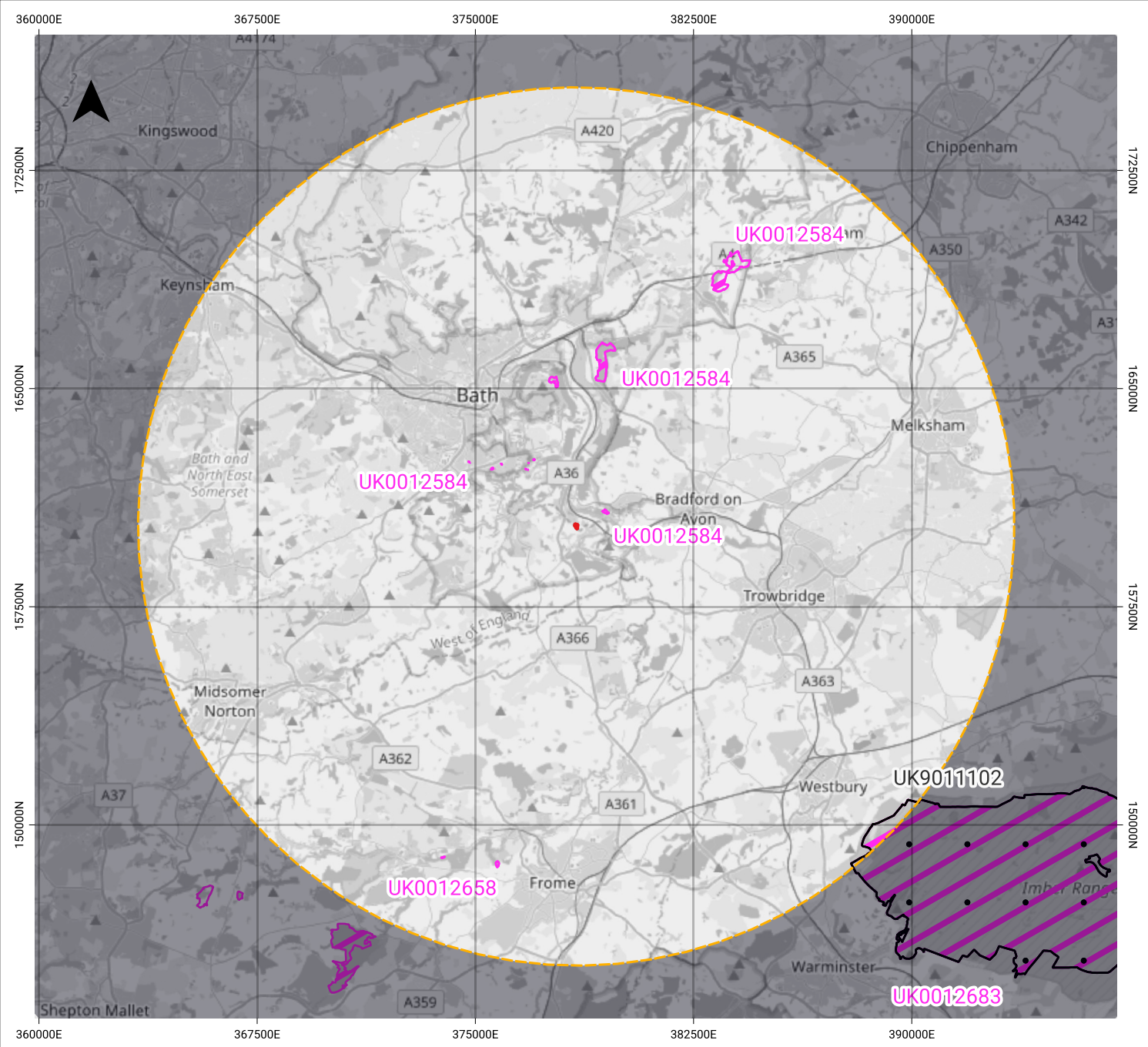
- The SAC for the Annex I habitats that occur here. It is the best remaining example of lowland juniper scrub on chalk in the UK, and has the priority habitat type "orchid rich sites". It is believed to be the largest surviving semi-

natural dry grassland within the EU. A cluster of large sub-populations of the Annex II Marsh fritillary butterfly (*Euphydryas aurinia*) species breeds on dry calcareous grassland here.

- The SPA because it supports important numbers of non-breeding Hen Harrier (*Circus cyaneus*); breeding Eurasian Hobby (*Falco subbuteo*); breeding Common Quail (*Coturnix coturnix*); and breeding Stone Curlew (*Burhinus oedicnemus*).



Image by Carl from Pixabay



0 4 8 12 16 20 km

Scale: 1:200000

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European Designated Sites

Red_Line_Boundary

15km Zone of Influence

Special Protection Areas (England)

Special Areas of Conservation (England)

SPECIAL AREAS OF CONSERVATION	
Uk0012584	Bath & Bradford on Avon Bats
Uk0012658	Mells Valley
Uk0012683	Salisbury Plain

SPECIAL PROTECTION AREAS	
Uk9011102	Salisbury Plain

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Author: Peter Stockting
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4.2. Nationally Designated Sites

4.2.1 As shown in the **Nationally Designated Sites Plan**, the following nationally protected sites are within 5km of the Site (there are no National Nature Reserves, or Local Nature Reserves within the zone of influence):

- Brown's Folly SSSI
- Winsley Mines SSSI
- Combe Down and Bathampton Down Mines SSSI
- Iford Manor SSSI
- Midford Valley Woods SSSI
- Inwood Warleigh SSSI
- Cleaves Wood SSSI
- Hinton Charterhouse Field SSSI
- Gripwood Quarry SSSI
- Hinton Charterhouse Pit SSSI
- Hinton Hill Wellow SSSI
- North Road Quarry Bath SSSI
- Cotswolds National Landscape (Area of Outstanding Natural Beauty)

4.2.2 Of the above, **Brown's Folly, Winsley Mines, and Combe Down and Bathampton Down Mines**, all form part of the Bath & Bradford on Avon SAC, providing key hibernation sites for multiple bat species, including the rare and endangered Greater horseshoe (*R. ferrumequinum*) bat. Brown's Folly is also designated for other rare features, including calcareous grassland and scrub communities, ancient woodland, and declining butterfly species, such as the Duke of Burgandy (*Hamearis lucina*).

4.2.3 While not part of the above SAC, **Iford Manor SSSI** is also vitally important for bats. It consists of a large country house and gardens that include a mosaic of habitats, including water meadow, pasture, hedgerows, orchard, and woodland. The barn and mill at this site are used as a summer maternity roost for the second largest breeding colony of Greater horseshoe bats (*R. ferrumequinum*) in England. With more than 250 bats recorded annually, it is one of only 14 known breeding roosts in the country. The orchard is also used by Daubenton (*Myotis daubentonii*) and Noctule (*Nyctalus noctula*) bats.

4.2.4 **Midford Valley Woods, Inwood Warleigh, and Cleaves Wood** are all primarily designated for their deciduous woodlands. Both Midford Valley and Inwood Warleigh consist of botanically rich Ash-Wych elm woods – while the latter also includes Ash-maple mixes – and populations of woodland breeding birds and rare invertebrates, such as White-letter hairstreak (*Satyrium w-album*). Inwood Warleigh also supports extensive hay meadow rides with large populations of Spiked Star-of-Bethlehem (*Ornithogalum pyrenaicum*) and scarce Meadow Saffron (*Colchicum autumnale*). Cleaves Wood also supports populations of Spiked Star-of-Bethlehem (*O. pyrenaicum*), as well as a mosaic of calcareous

grassland, neutral marshy grassland, streams, and nationally scarce invertebrate fauna, such as Duke of Burgandy (*H. lucina*), Green hairstreak (*Callophyrus rubi*), the *Ena montana* snail, and various rare beetles.

4.2.5 **Hinton Charterhouse Field** stands alone from the above because it is specifically designated for the presence of one nationally rare plant, the Field Eryngo (*Eryngium campestre*). This is its most northerly known population in Britain.

4.2.6 The remaining SSSIs, **Gripwood Quarry, Hinton Charterhouse Pit, Hinton Hill Wellow, and North Road Quarry Bath** are all designated for geological rather than biological features, and as such are not discussed further here.

4.2.7 The Site also falls within the southernmost tip of the **Cotswold National Landscape** (AONB), which has an underlying geology of Jurassic limestone. Designated since 1966, it is the third largest protected landscape in England. This designation is as much cultural as it is ecological.

"The Cotswolds is often described as a 'quintessentially English' landscape – rolling hills, green farmland, wooded valleys, and picturesque villages." - Landscape information - Cotswolds National Landscape

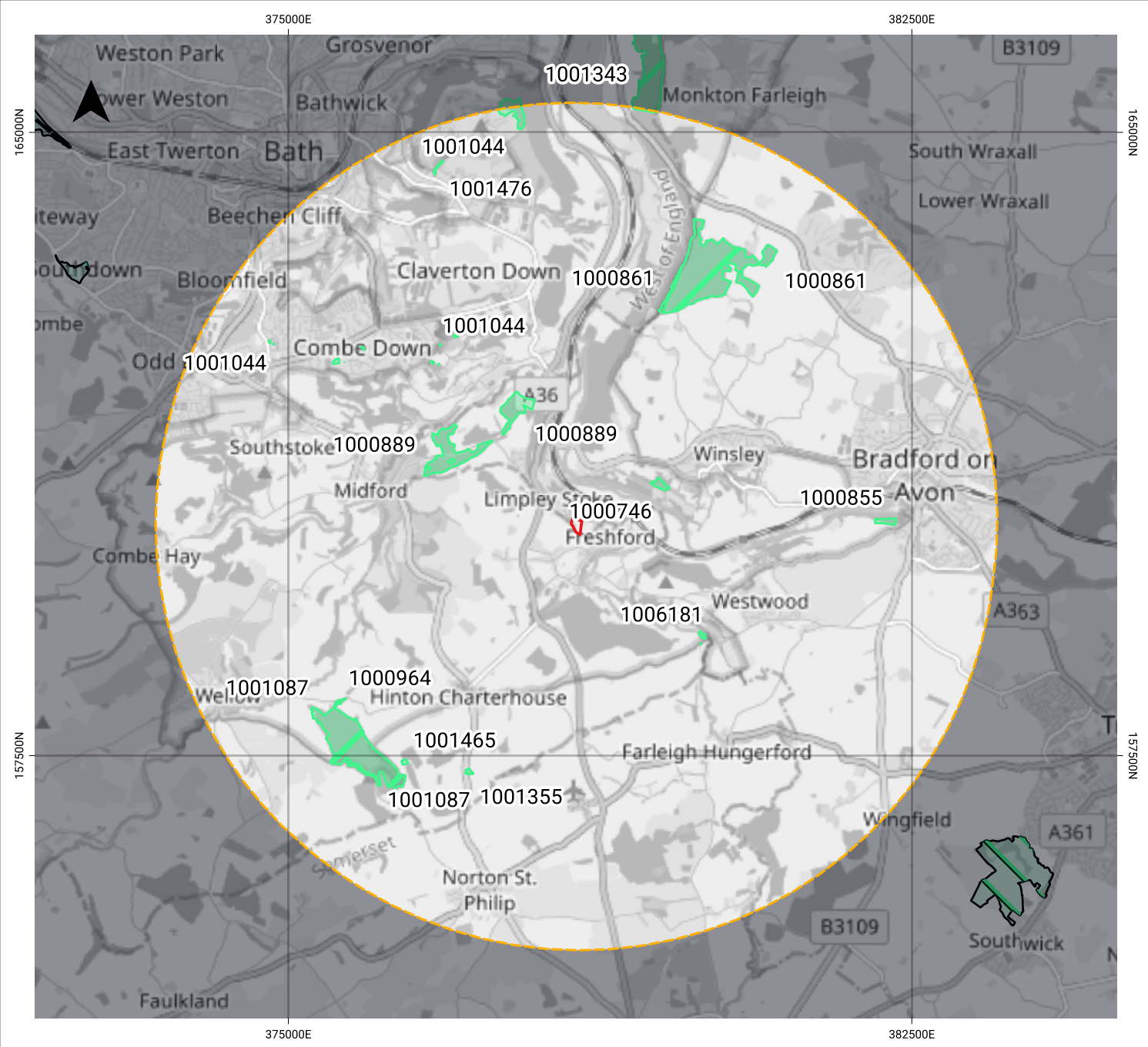
4.3. Non-Statutory Sites

4.3.1 Also called locally designated sites, these areas are recognised for their ecological and geological importance, and are therefore protected through planning documents. Local designations provide an indication of the habitats and species that are uncommon and valuable in the local area and offer a benchmark of the ecological value of local habitats. While not afforded the same legal protection as other sites, non-statutory sites can still support truly special wildlife.

4.3.2 Between the BRERC and WSBRC data search results, 12 non-statutory sites were returned within 1km of the Site:

- Avoncliff Wood SNCI
- Friary Wood SNCI
- Hayes Wood SNCI
- River Avon SNCI
- River Frome SNCI
- Conkwell Wood LWS
- Murhill Bank LWS
- Crowe Hill Meadow LWS
- Bristol Avon River LWS
- Kennet & Avon Canal LWS
- Stokeford Weir, bed and banks of River Avon LGS
- Winsley Hill Verge PRV

4.3.3 Of these, the majority are protected predominantly for their Ancient Woodland status, or for their riparian habitats. The River Avon is recorded in both environmental record centres, so is counted twice.



Scale: 1:70000

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Nationally Designated Sites

- Red_Line_Boundary
- 5km Zone of Influence
- Local Nature Reserves (England)
- Sites of Special Scientific Interest (England)

SITES OF SPECIAL SCIENTIFIC INTEREST	
1000746	Winsley Mines SSSI
1000855	Gripwood Quarry SSSI
1000861	Inwood, Warleigh SSSI
1000889	Midford Valley Woods SSSI
1000964	Hinton Hill, Wellow SSSI
1001044	Combe Down and Bathampton Down Mines SSSI
1001087	Cleaves Wood SSSI
1001343	Brown's Folly SSSI
1001355	Hinton Charterhouse Pit SSSI
1001465	Hinton Charterhouse Field SSSI
1001476	North Road Quarry, Bath SSSI
1006181	Iford Manor SSSI

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Author: Peter Stockting
Made with: QGIS 3.44.2-Solothurn

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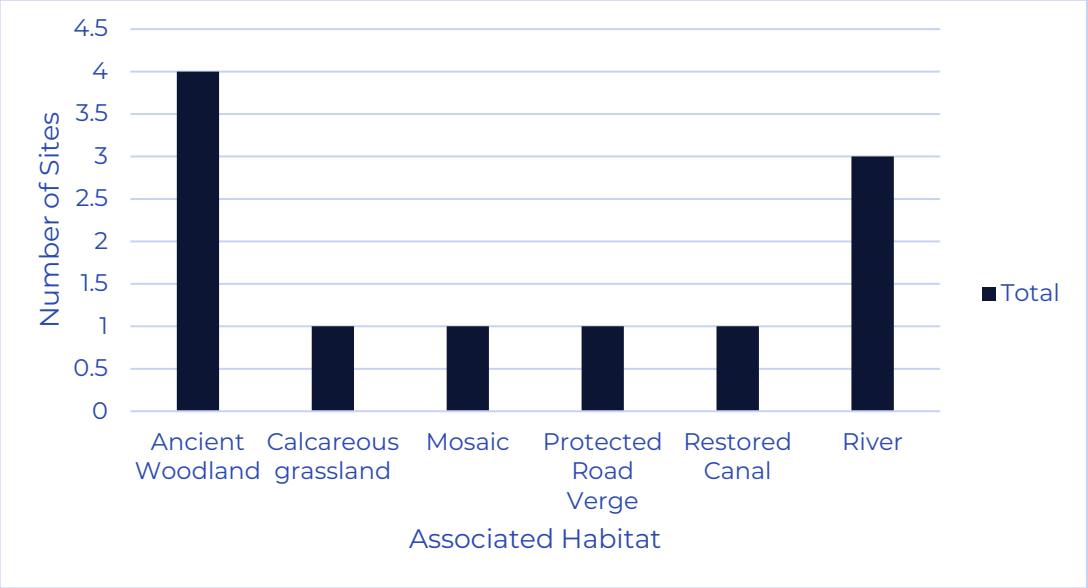


Figure 4-1. Main Habitat Features Across Locally Designated Sites

4.3.4 The Site also falls within the core area of Bath and Bradford on Avon Bat SAC consultation zone (see **Bat Consultation Zone Plan**).

4.4. River Catchment & Course

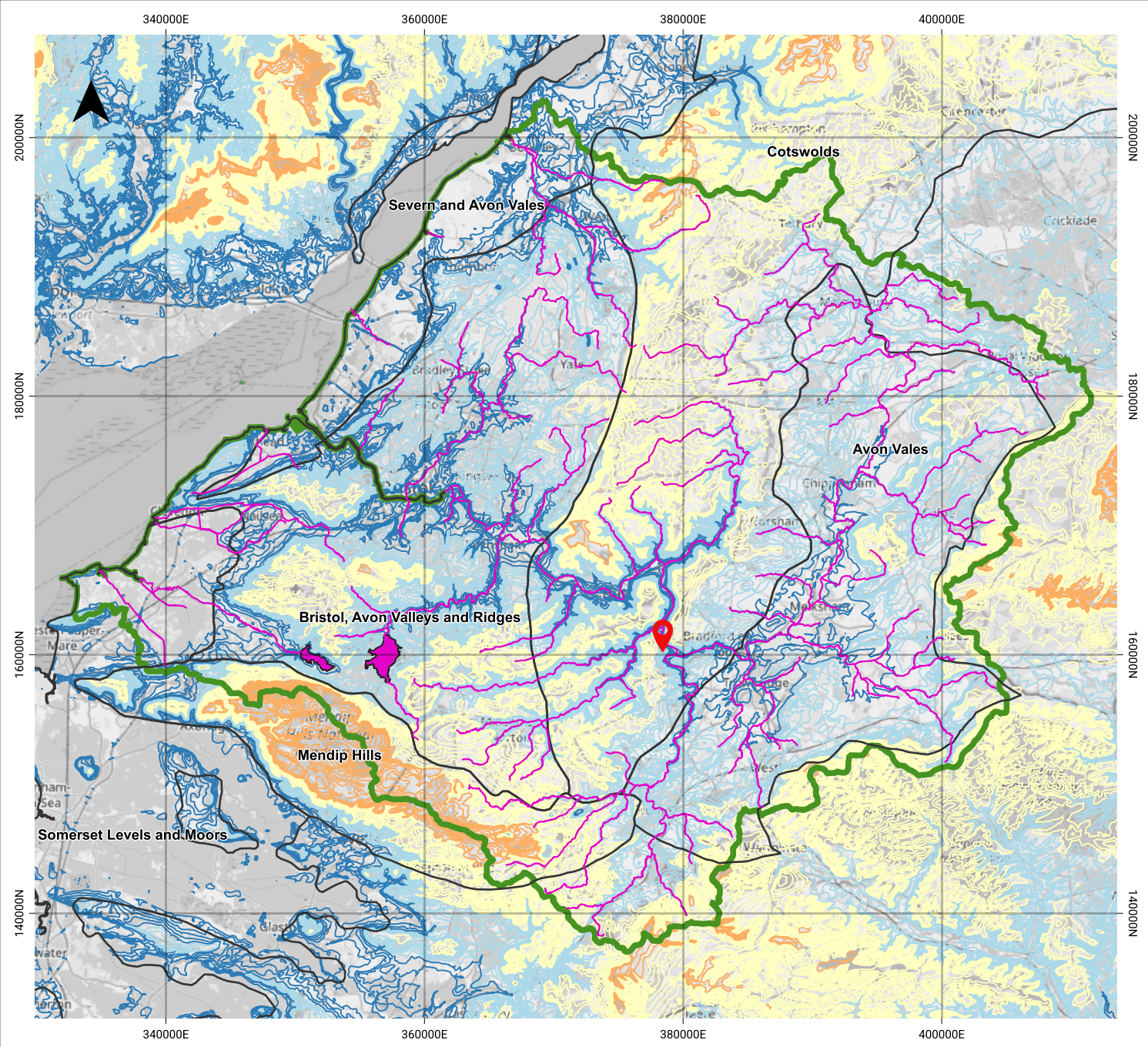
4.4.1 Rivers are a priority habitat under *Section 41* of the *Rural Natural Environment and Rural Communities Act 2006*. As such, local authorities have a duty to conserve them.

4.4.2 No streams or ditches run through or adjacent to the Site, which lies 332.48m west of the River Frome, and 409.28m south of the River Avon.

4.4.3 The River Frome joins the River Avon near Avoncliff Wood. From there, the river runs west through Bath and Bristol and into the Bristol Channel and the Severn Estuary (see the **River Catchment & Course Plan**).

4.5. Habitats and Ecological Networks

4.5.1 The Site sits on the southern tip of Limpley Stoke, just west of Freshford, and halfway between the River Frome and the River Avon. The Wessex Main Line runs between it and the latter. Deciduous woodland breaks up the landscape, several parcels of which are classified as the irreplaceable habitat Ancient Woodland, with one parcel of priority Wood Pasture and Parkland near Westwood and Iford Manor SSSI. There is also a large swath of Good Quality Semi-improved Grassland running along the River Frome by Friary Wood, and an area of Lowland Calcareous Grassland within Westwood. Several ponds are also scattered throughout the landscape (see **Priority Habitats Plan**).



0 9 18 27 36 45 km

Scale: 1:450000

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River Catchment & Course

BENGROVE LTD

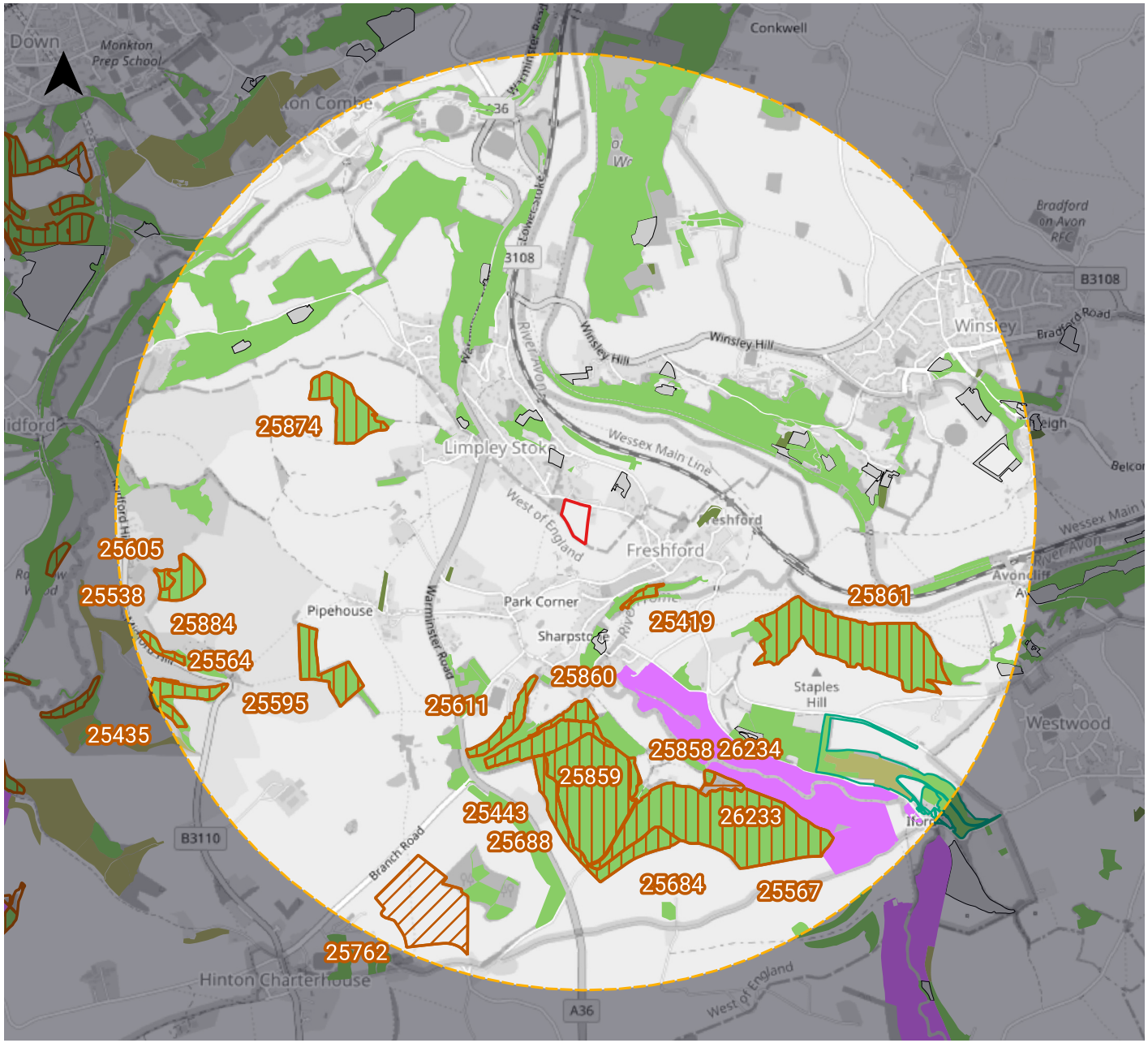
- Site Location
- Rivers
- Lakes
- National Character Areas

OS Terrain® 50 map data

- -130 - 50
- 50 - 110
- 110 - 210
- 210 - 370
- Avon Bristol and Somerset North Streams Management Catchment (MC 3005)

Date: 29-04-2026
Author: Peter Stockting
Made with: QGIS 3.44.2-Solothurn

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0 0.5 1 1.5 2 2.5 km

Scale: 1:27500

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Priority Habitats

- Red_Line_Boundary
- 2km Zone of Influence
- Wood Pasture and Parkland
- Ancient & Semi-Natural Woodland
- Ancient Replanted Woodland
- Ancient Wood Pasture
- Deciduous woodland
- Good quality semi improved grassland
- Lowland calcareous grassland
- No main habitat but additional habitats present
- Traditional orchard

ANCIENT WOODLAND INVENTORY	
25419	War Memorial Wood
25435	Hang Wood
25443	Friary Wood
25538	Midford Hill Wood
25564	Hang Wood
25567	Friary Wood
25595	Hog Wood
25605	Midford Hill Wood
25611	The Shrubbery
25684	Friary Wood
25688	Friary Wood
25762	Hinton House
25858	Friary Wood
25859	Friary Wood
25860	Friary Wood
25861	Avoncliff Wood
25874	Hayes Wood
25884	North of Hang Wood
26233	Friary Wood
26234	Friary Wood

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Author: Peter Stockting
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4.5.2 The Site comprises a species-poor modified grassland (see **Baseline Habitats Plan**). The sward is short and uniform across the field, with no significant variation in height or structure. The sward is dominated by Perennial rye-grass (*Lolium perenne*) and Red fescue (*Festuca rubra*), with abundant Creeping buttercup (*Ranunculus repens*), White clover (*Trifolium repens*) and Ribwort plantain (*Plantago lanceolata*). Cock's-foot (*Dactylis glomerata*), Dandelion (*Taraxacum* sp.) and Common Sorrel (*Rumex acetosa*) were frequent, and Timothy (*Phleum pratense*) occasional. A total of nine vascular plant species was recorded across the two quadrats, with eight species per square metre on average.

4.5.3 The species composition is characteristic of an agriculturally improved grassland: rye-grass and clover dominate, indicator species characteristic of higher-distinctiveness neutral grassland habitats such as Common Knapweed (*Centaurea nigra*), Bird's-foot Trefoil (*Lotus corniculatus*) or Yellow Rattle (*Rhinanthus minor*) were absent, and species indicative of suboptimal condition (Creeping Buttercup, White Clover and Ribwort Plantain) made up a substantial proportion of cover. The grassland is classified as Modified grassland (g4) in Moderate condition. The grassland is not classified as a priority habitat and is not considered to be of more than Site-level botanical interest.



4.5.4 A native hedgerow forms the western boundary of the Site, which runs into scrub rather than hedgerow to the south. It includes Hawthorn (*Crataegus monogyna*), Blackthorn (*Prunus spinosa*), Field maple (*Acer campestre*), Elder (*Sambucus nigra*) and Sycamore (*Acer pseudoplatanus*). The base flora is dominated by ruderal and rank-grassland species and a carpet of Ivy (*Hedera helix*).

4.5.5 The northern hedge sits on the road embankment and comprises Hawthorn (*Crataegus monogyna*) and Blackthorn (*Prunus spinosa*), with frequent English Elm (*Ulmus procera*), Crab Apple (*Malus sylvestris*) and Dog Rose (*Rosa canina*).



0 50 100 m

Scale: 1:1500

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Baseline Habitats

BENGROVE LTD

- Red Line Boundary
- Native hedgerow
- Modified grassland

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4.6. Amphibians

4.6.1 The following amphibian records within the zone of influence (1km) were returned from the local environment record centres:

Table 4-1. Number of records returned for each LERC.

Species	WSBRC	BRERC
Common frog (*Rana temporaria*)	2	0
Common toad (*Bufo bufo*)	2	2
Great Crested Newt (*Triturus cristatus*)	1	10
Smooth newt (*Lissotriton vulgaris*)	0	9

4.6.2 The desk study also confirmed the following:

- One pond was recorded during the Great Crested Newt Pond Surveys (2017-2019), from which GCN were absent.
- There were no granted European Protected Species Applications for Great Crested Newts.
- There were no Great Crested Newt class survey licence returns.
- The Site falls within a Fringe Area of the GCN Strategic Opportunity Areas (SOA) mapping (Fringe: 2), and sits within Zone A of the Habitat Suitability Index (HSI).

4.6.3 The desk study identified **7 potential ponds within 500m** of the Site, none of which fall within the Red Line Boundary (see **Freshwater Habitats Plan**). Ponds 2, 4, 5 and 7 on the plan appear to be garden ponds and swimming pools and are unlikely to be used by Great Crested Newts. Ponds 1, 3 and 6 are over 250m away from the Site.

4.6.4 There are no waterbodies, ditches or areas of standing water within the Site, and the topography and free-draining soils mean the field does not pond or hold water. The Site cannot therefore support GCN at any point in their aquatic life-cycle. Most of the Site (the open grassland field) is of negligible value as terrestrial habitat for GCN: it provides minimal cover, few invertebrate prey resources of value to newts, and no hibernation potential. The hedges are suitable as a dispersal corridor for newts moving between off-Site ponds, but they are limited in extent.

4.6.5 The Site is bounded by a number of features which reduce the likelihood of newts reaching it from any breeding pond in the surrounding landscape:

- The River Frome (approximately 332 m west of the Site) and the River Avon (approximately 409 m north of the Site) are both relatively fast-flowing

watercourses that are effective barriers to terrestrial dispersal. Together they constrain the practical catchment of the Site to land lying south and east of these rivers.

- Church Lane (a low-traffic rural lane) runs along the northern boundary; this is a moderate barrier to dispersal.

4.6.6 GCN are unlikely to be present on Site as a resident or regularly foraging part of the population, and the open field is highly unlikely to be used by the species. There remains, however, a residual possibility that newts originating from one of the ponds within 500 m could occasionally use the hedges for foraging, sheltering or hibernation.



0 0.1 0.2 0.3 0.4 0.5 km

Scale: 1:7500

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Freshwater Habitats

- Red_Line_Boundary
- 500m Zone of Influence
- Ponds
- Surface Water Line
- Surface Water Area

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4.7. Birds

4.7.1 In total, 132 records were returned in the 1km WSBRC data search and 714 records within the BRERC results. Results were distributed across 79 different species, with varying levels of conservation status. The tables below show the number of records for both records centre in square brackets [WSBRC, BRERC]:

Table 4-2. 17 Red Listed Species

Mistle Thrush [5,11]	Marsh Tit [1,10]	Lesser Spotted Woodpecker [0,1]
Starling [4,5]	Spotted Flycatcher [1,4]	Grasshopper Warbler [0,1]
Fieldfare [2,2]	Cuckoo [0,4]	Willow Tit [0,1]
Herring Gull [2,7]	Tree Sparrow [0,3]	Hawfinch [0,1]
Linnet [2,2]	Turtle Dove [0,2]	Lapwing [0,1]
House Sparrow [1,16]	Skylark [0,2]	

Table 4-3. 13 Amber Listed Species

Dipper [9,40]	Willow Warbler [2,0]
Mallard [7,14]	Bullfinch [2,4]
Dunnock [6,25]	Common Sandpiper [1,1]
Stock Dove [5,11]	Kestrel [1,4]
Lesser Black-backed Gull [2,13]	Tawny Owl [0,1]
Meadow Pipit [2,4]	Common Gull [0,1]
Black-headed Gull [2,4]	

Table 4-4. 49 Green Listed Species

Woodpigeon [12,0]	Barn Owl [1,0]	Goosander [0,10]
Kingfisher [10,30]	Whitethroat [1,1]	Pied Wagtail [0,8]
Wren [9,29]	Blue Tit [0,33]	Raven [0,7]
Swift [5,8]	Robin [0,32]	Redwing [0,6]
Song Thrush [5,0]	Buzzard [0,29]	Mute Swan [0,4]
Grey Heron [5,12]	Great Tit [0,24]	Mandarin [0,4]
Cormorant [4,4]	Nuthatch [0,20]	Siskin [0,3]
Red Kite [3,2]	Goldfinch [0,19]	Sparrowhawk [0,2]
Grey Wagtail [3,22]	Goldcrest [0,19]	Goshawk [0,1]
Peregrine [3,4]	Green Woodpecker [0,19]	Hobby [0,1]
Redwing [2,6]	Song Thrush [0,18]	Little Grebe [0,1]
House Martin [2,18]	Coal Tit [0,18]	Garden Warbler [0,1]
Rook [2,0]	Chiffchaff [0,18]	Great White Egret [0,1]
Greenfinch [2,16]	Swallow [0,18]	Canada Goose [0,1]
Moorhen [2,0]	Great Spotted Woodpecker [0,18]	Sand Martin [0,1]
Little Egret [1,4]	Blackcap [0,17]	
Collared Dove [1,0]	Treecreeper [0,16]	

4.7.2 Of these species, they are predominantly associated with water, wetland, farmland and woodland habitats.

4.7.3 The Site itself is too small and the grass too short to support a population of ground-nesting farmland birds. However, the western and northern hedgerows provide suitable nesting habitat for the farmland and woodland birds in the wider landscape, as well as occasional foraging within the field itself.

4.8. Fish

4.8.1 There were no records for fish returned in the data search results.

4.8.2 There are no watercourses or waterbodies on or adjacent to the site so the proposals would not have any direct impacts on any fish species. The nearest watercourse to the Site is the River Frome, which is ca.340m away and separated from the Site by fields and woods.

4.9. Invertebrates (aquatic and terrestrial)

4.9.1 In total, 19 records were returned in the WSBRC data search and 283 records within the BRERC results. These were distributed across 104 different species, with varying levels of legal protection. The following section shows the number of records for both local environmental record centres in square brackets [WSBRC, BRERC].

4.9.2 Two of the species were recorded by both WSBRC and BRERC:

- Jersey Tiger (*Euplagia quadripunctaria*) [1,5]. This moth is nationally scarce, but its numbers are increasing. Its caterpillars feed on a variety of herbaceous plants, including Common Nettle (*Urtica dioica*), Hemp-agrimony (*Eupatorium cannabinum*), Bramble (*Rubus fruticosus*) and others. Habitats in the wider area around the Site where it may be found include gardens, rough and disturbed ground, and hedgerows. It is listed as a priority species in Annex II of the Habitats Directive.
- Cinnabar (*Tyria jacobaeae*) [1,2]. This is a common species, but is a priority for research. Its caterpillars typically feed on the leaves and flowers of Common Ragwort (*Senecio jacobaea*). Within the area, they are most likely to be found in open grassy habitats, including waste ground, railway banks, gardens, and woodland. They are most frequent on well drained rabbit-grazed grassland. This species is listed under Section 41 of the NERC Act.

4.9.3 The other species returned in the data search were:

Table 4-5. Further 97 Moth & Butterfly Species

Dingy Skipper [10,0]	Small Phoenix [0,3]	Great Prominent [0,1]
White-letter Hairstreak [4,0]	Buff Footman [0,3]	Chocolate-tip [0,1]
Small Heath [1,0]	Pine Carpet [0,3]	Wood Carpet [0,1]
Silver-washed Fritillary [0,3]	Centre-barred Sallow [0,3]	Sharp-angled Peacock [0,1]
White Admiral [0,1]	Oak-tree Pug [0,3]	Mouse Moth [0,1]
Scarlet Tiger [0,1]	White-spotted Pug [0,3]	Ear Moth [0,1]
Vine's Rustic [0,12]	Least Black Arches [0,3]	Rosy Minor [0,1]
Small Square-spot [0,10]	Knot Grass (moth) [0,3]	Small Ranunculus [0,1]
Buff Ermine [0,9]	Pinion-streaked Snout [0,2]	Clouded Magpie [0,1]
Coronet [0,9]	Buttoned Snout [0,2]	Beaded Chestnut [0,1]
Brussels Lace [0,8]	Alder Moth [0,2]	Dotted Chestnut [0,1]
White Ermine [0,8]	Shoulder-striped Wainscot [0,2]	Double Lobed [0,1]
Blood-vein [0,7]	Pretty Chalk Carpet [0,2]	Red-belted Clearwing [0,1]
Rustic Shoulder-knot [0,7]	August Thorn [0,2]	Yellow-barred Brindle [0,1]
Dusky Thorn [0,7]	Rosy Rustic [0,2]	Reddish Light Arches [0,1]
Scarlet Tiger [0,6]	Dark Chestnut [0,2]	Dingy Shell [0,1]
Scarce Footman [0,6]	Seraphim [0,2]	European Corn Borer [0,7]
Rosy Footman [0,6]	Dark Spectacle [0,2]	Pearl Grass-moth [0,2]
Brindled Beauty [0,6]	Dingy Shears [0,2]	Gromwell Ermine [0,2]
Orange Footman [0,6]	Green-brindled Crescent [0,2]	Spindle Knot-horn [0,2]
Muslin Footman [0,6]	Shaded Broad-bar [0,1]	Willow Ermine [0,2]
Haworth's Pug [0,5]	Figure of Eight [0,1]	Beet Moth [0,2]
Mottled Rustic [0,5]	Engrailed [0,1]	White-barred Apple Moth [0,1]
Oak Hook-tip [0,4]	Maiden's Blush [0,1]	Ruddy Streak [0,1]
Scorched Wing [0,4]	Bordered Beauty [0,1]	Ringed China-mark [0,1]
Treble Brown Spot [0,4]	Mocha [0,1]	Black-barred Fungus Moth [0,1]
Gold Spot [0,4]	Old Lady [0,1]	Dark-spotted Moss-moth [0,1]
L-album Wainscot [0,4]	Powdered Quaker [0,1]	Bramble Bronze [0,1]
Beautiful Hook-tip [0,3]	Feathered Gothic [0,1]	Dark-streaked Tortrix [0,1]
Small Elephant Hawk-moth [0,3]	Clay Triple-lines [0,1]	Common Fern Moth [0,1]
Black Arches [0,3]	Brown Rustic [0,1]	Beautiful China-mark [0,1]
Barred Hook-tip [0,3]	Sycamore (moth) [0,1]	
Dot Moth [0,2]	Hoary Footman [0,1]	

Table 4-6 Four True-fly Species

Macrorrhyncha flava [1,0] (a true fly)	A bee-fly [0,4]
Epistrophe diaphana [0,1] (a hoverfly)	Volucella inflata [0,1] (a hoverfly)

Table 4-7. Two Ant, Bee, Wasp, Sawfly, or Ichneumon Species

Red-tailed Mason Bee [1,0]	Small Garden Bumblebee [0,3]

Table 4-8. One Dragonfly, Hawker or Damselfly Species

White-legged Damselfly [0,2]

4.9.4 No species were noted on Site during the survey. Records of rabbits were returned in the data search results, and a rabbit warren recorded at the southern end of the field. However, considering the type of habitats present the Site is not likely to support notable assemblages or groups of these species.

4.10. Badgers

4.10.1 WSBRC returned ten badger records (including one sett), and BRERC returned four.

4.10.2 There were mammal paths through the Site and a Rabbit warren at the southern end of the field (outside of the red line boundary). The open field provides good foraging habitat for Badgers, and the steep earth bank covered with scrub to the west of the Site provides good shelter and potential sett building areas.

4.11. Bats

4.11.1 Collectively, 228 bat records were returned in the WSBRC and BRERC data searches, split between 12 of the 18 UK resident bat species:

Species	WSBRC	BRERC
Confirmed species		
Lesser Horseshoe (*Rhinolophus hipposideros*)	29	0
Soprano Pipistrelle (*Pipistrellus pygmaeus*)	22	1
Common Pipistrelle (*Pipistrellus pipistrellus*)	18	1
Serotine (*Cnephaeus serotinus*)	17	0
Greater Horseshoe (*Rhinolophus ferrumequinum*)	15	9
Barbastelle (*Barbastella barbastellus*)	7	0
Noctule (*Nyctalus noctula*)	6	0
Natterer's bat (*Myotis nattereri*)	2	0
Brown Long-eared bat (*Plecotus auritus*)	2	0

Species	WSBRC	BRERC
Daubenton's bat (*Myotis daubentonii*)	2	2
Brandt's bat (*Myotis brandtii*)	1	0
Unconfirmed species		
Myotis bat (*Myotis spp.*)	15	0
Long-eared bat (*Plecotus spp.*)	10	0
Pipistrelle (*Pipistrellus spp.*)	8	0
Bat (*Chiroptera*)	1	0

4.11.2 These included records for the following roosts:

Species	No. Roosts	Type(s)
Lesser Horseshoe (*R. hipposideros*)	12	Hibernaculum, Roost
Pipistrelle (*Pipistrellus spp.*)	7	Maternity roost, Roost
Greater Horseshoe (*R. ferrumequinum*)	6	Hibernaculum, Roost
Serotine (*C. serotinus*)	3	Roost
Brown Long-eared bat (*P. auritus*)	2	Roost
Soprano Pipistrelle (*P. pygmaeus*)	2	Roost
Natterer's bat (*M. nattereri*)	2	Roost
Daubenton's bat (*M. daubentonii*)	1	Undetermined
Common Pipistrelle (*P. pipistrellus*)	1	Roost
Brandt's bat (*M. brandtii*)	1	Undetermined

4.11.3 There are 18 records of granted European Protected Species Applications for bats within 2km of the Site.

4.11.4 The Site lies within the core area of the Bath & Bradford on Avon Bats SAC consultation zone (see **Bat Consultation Zone Plan**). The boundary hedgerows connect into the wider hedgerow and woodland network of the Avon and Frome valleys. They therefore have potential to be used by the SAC qualifying bat species, and the relative likelihood of such use is considered for each species below.

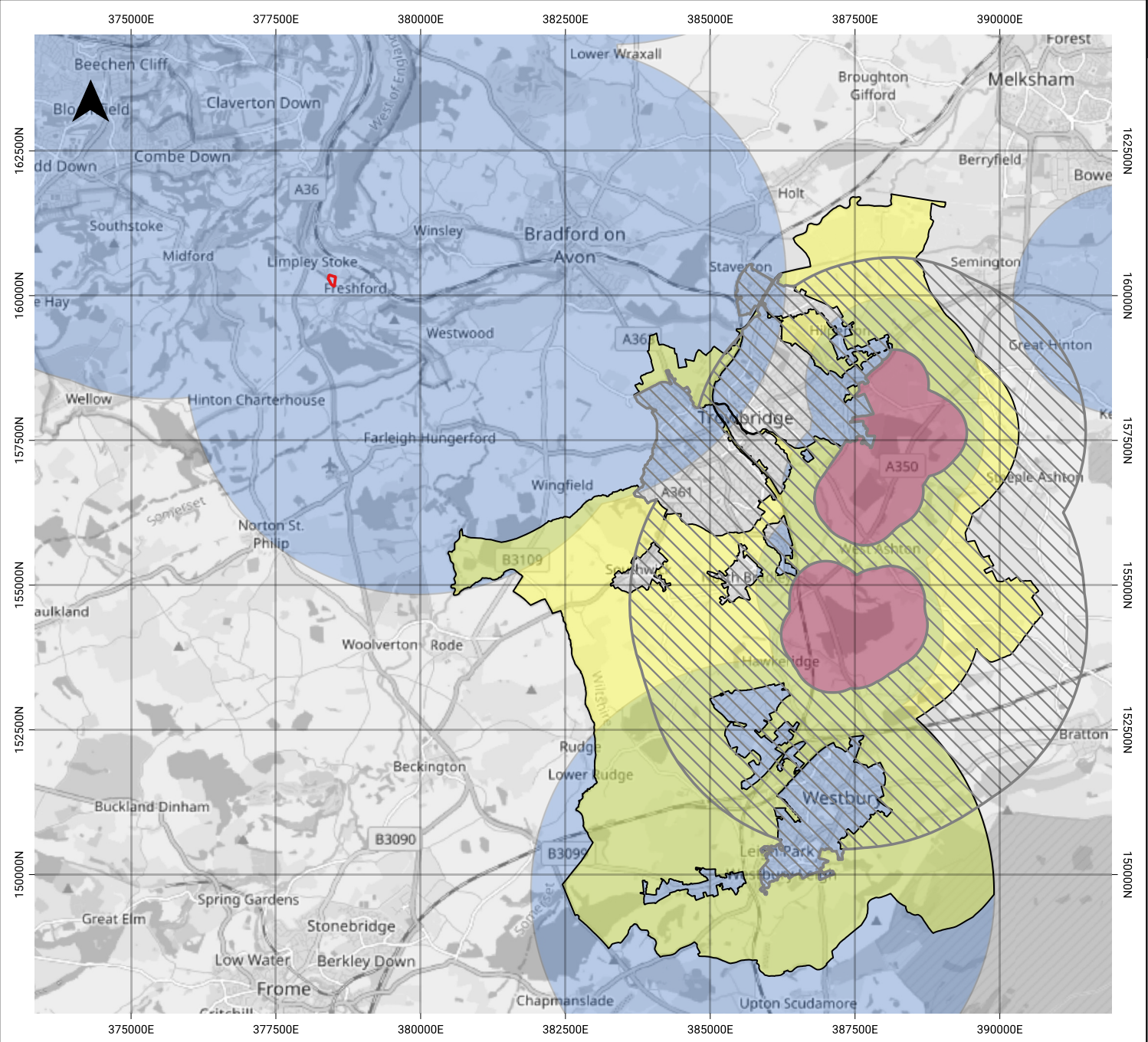
4.11.5 **Greater Horseshoe bat – high likelihood of use.** Greater Horseshoe is an "edge" species that commutes from its hibernation and maternity roosts along hedgerows with trees, woodland edges and river corridors, very rarely crossing open ground. Foraging is concentrated in cattle- or horse-grazed permanent pasture (where it feeds heavily on dung beetles and cockchafers), unimproved meadow and woodland edge, typically within 4 km of the maternity roost, with regular movements of up to 7 km recorded. The SAC hibernacula at Brown's Folly, Winsley Mines and Combe Down & Bathampton Down, and the Iford Manor maternity roost, all lie within this commuting range of the Site. The boundary hedgerows of the Site may therefore be used as commuting routes between roosts and pasture in the Avon and Frome valleys. The foraging value of the grassland in the open field is more limited.

4.11.6 **Lesser Horseshoe bat – moderate to high likelihood of use.** Lesser Horseshoes also commute along hedgerows, but with a much smaller foraging range than Greater Horseshoe (typically within 2–3 km of the roost, often less in the early maternity period). It favours broadleaved woodland, scrub, riparian habitat and continuous, well-developed hedgerows, and avoids large open fields and gappy or low hedges. The hedgerows on the Site boundary provide suitable sheltered linear features. The interior of the field is of low value to Lesser Horseshoe.

4.11.7 **Bechstein's bat – low likelihood of use**. Bechstein's bat is a woodland specialist, gleaning prey from foliage in mature, semi-natural deciduous woodland with a closed canopy. The Site contains no woodland, and its hedgerows are not directly connected to any of the mature woodland blocks (Midford Valley Woods, Inwood Warleigh, Cleaves Wood) that this species would typically inhabit. Occasional passage cannot be entirely ruled out, but the Site does not provide the canopy-closed woodland habitat on which Bechstein's bat depends

4.11.8 In addition to the SAC qualifying species, the Site is likely to support, or be used by, more common bat species typical of the local landscape, including Common and Soprano pipistrelle (*Pipistrellus pipistrellus* and *P. pygmaeus*), Serotine (*Eptesicus serotinus*), Noctule (*Nyctalus noctula*) and *Myotis* spp. As with the SAC species, the boundary hedgerows form the principal commuting and foraging features, while the field interior is of low intrinsic value.

4.11.9 No buildings or mature trees with bat roosting potential are present within the Red Line Boundary, and the proposals do not involve the loss of any structure capable of supporting a roost. Risks to bats are therefore limited to the loss or disturbance of commuting and foraging habitat (principally the boundary hedgerows and the dark conditions along them), rather than to roosts.



Scale: 1:100000

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Bat Consultation Zones

Red_Line_Boundary

Trowbridge Westbury Bat Mitigation Strategy

- Medium risk for increased recreational impacts
- High risk for habitat loss and increased recreational impacts
- Medium risk for habitat loss

Impact Zones For Bat Species

- Bath and Bradford on Avon bat SAC core area.

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Author: Peter Stockting
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4.12. Dormice

4.12.1 No dormice records were returned in either the WSBRC or BRERC data search results. Additionally, there were no granted European Protected Species Applications for dormice within the 2km zone of influence.

4.12.2 The hedgerows around the edge of the site are suitable for dormice and they are connected into the wider landscape. Given the absence of records and the low density at which Dormice use hedges (as opposed to woodland), they are likely to be an infrequent visitor at most or absent from the Site.

4.13. Riparian Mammals

4.13.1 Records for the following riparian mammals were returned in the data search results:

Table 4-9. Total number of records per species.

Species	WSBRC	BRERC
Water Shrew (*Neomys fodiens*)	7	0
Otter (*Lutra lutra*)	5	1
Water Vole (*Arvicola amphibius*)	13	3
Beaver (*Castor fiber*)	10	0
American Mink (*Neovision vision*)	0	2

4.13.2 These species were variously recorded at the following locations surrounding the Site:

- River Avon
- River Frome
- Bristol Avon
- Limpley Stoke and Limpley Stoke Wier
- Kennet & Avon Canal
- Freshford
- Conkwell
- Murhill
- Woods Hill
- Midford Brook Wier

4.13.3 As there are no watercourses on or near to the Site, these species are not considered further in this report.

4.14. Section 41. Mammals and Other Species

4.14.1 The only *Section 41* mammal in the data search results is Hedgehogs. The hedges and field margins are good habitat for hedgehogs and they could be resident or occasional visitors to the Site.

4.15. Reptiles

4.15.1 No reptile records were returned in the BRERC data search, but twenty-eight records in total were provided by WSBRC, split between the following species:

Species	No. Records
Common Lizard (*Zootoca vivipara*)	11
Slow-worm (*Anguilis fragilis*)	9
Grass snake (*Natrix helvetica*)	6
Adder (*Vipera berus*)	2

4.15.2 The mosaic of habitats on and around the Site could provide suitable habitats for Slow-worms, Grass Snakes and Common Lizards, but Adders are likely absent from the Site. Of the three species that could use the Site the most likely would be Slow-worms, which are often associated with gardens and churchyards. The open field has only limited value for reptiles as there is no good sheltering or hibernation habitat, whilst the hedges are well-connected habitat which reptiles could use for foraging and sheltering.

5. CONCLUSIONS

5.1. Designated Sites

5.1.1 The proposed development would not result in any direct land-take from, or physical effect on, any statutory or non-statutory site designated for nature conservation.

5.1.2 The Site does, however, fall within the core area of the Bath & Bradford on Avon Bats SAC consultation zone. The boundary hedgerows have the potential to provide commuting and foraging habitat for at least two of the SAC qualifying species (greater horseshoe and lesser horseshoe bats), which would be a functional ecological link between the Site and the SAC.

5.1.3 It is essential that the development proposals do not result in severing any commuting habitat; either through physical removal or from light spill. The proposed road entrance off Church Lane will require a break in the hedge and the realignment of a section of hedge to provide a safe visibility splay. This must be designed so that the length of the gap is kept to an absolute minimum and it must not be lit by any artificial lighting. The realigned section of hedge can be formed by translocating the existing hedge (subject to a suitable plan to ensure its success) or by planting a new section of hedge either side of the road access to stitch it back into the hedge network. There must also be no new artificial lighting within the site that would illuminate the hedges above 04. Lux on the horizontal plane or 0.2 lux on the vertical plane.

5.1.4 If any lighting is required then a detailed external and internal lighting strategy will be prepared by a suitably qualified lighting engineer, working to ILP Guidance Note 08/23. The strategy will include:

- a lighting layout plan showing luminaire positions, heights, mounting details, beam angles, tilt, and manufacturer data for each specified luminaire;
- full photometric modelling producing horizontal and vertical lux contours across the site and onto boundary features, at ground level and at the relevant bat flight heights;
- demonstration that lux levels over any habitat that is suitable for horseshoe bat commuting or foraging — including the northern hedgerow, the route toward the Wellow Brook corridor and any buffered strips within the site — remain at or below the relevant Lux levels;
- warm-colour, low-lumen, fully shielded luminaires with part-night and/or PIR control, a defined curfew, and avoidance of upward light spill;
- design of “dark corridors” along retained linear features, with buffer widths
- provisions for the control of internal light spill from dwellings, including window positioning, glazing treatments and boundary planting where necessary.

5.2. Habitats

5.2.1 The habitats of greatest ecological value are the hedges on the boundaries of the Site. These are being retained and would be protected during construction (except for the road access). The impact of the removal and realignment of the hedge will be offset by enhancing the retained sections of hedgerow.

5.2.2 Areas of lower footfall around the edges of the site will be enhanced and managed to provide more species-rich grassland with a tussocky sward. Tree planting and a new orchard, combined with the enhanced grassland, will deliver in excess of the mandatory 10% net gain.

5.3. Protected and Notable Species

5.3.1 The project is not likely to have any adverse impacts on most of the protected and notable species considered in this report. Significant ecological effects on Badgers, nesting birds, Hedgehogs and reptiles are unlikely even in the absence of avoidance or mitigation measures beyond standard good practices. The application of precautionary measures during construction, via the implementation of a Construction Ecological Mitigation Plan (CEMP), would be sufficient to ensure no significant impacts on these receptors. The community farm would provide habitats that would be of equal or perhaps improved value for birds and reptiles subject to appropriate design and management of the wildlife spaces around the edges of the Site.

5.3.2 There is a small residual risk of impacts on habitats used by Great Crested Newts. Great crested newts breed in ponds but spend much of their lifecycle in terrestrial habitats, of which their favoured habitat is broadleaved woodland. They can be found in terrestrial habitats throughout the year, but they will typically be found in ponds during the breeding season between January / February at the earliest (in warm winters) and June / July. In the autumn they will spend much of their time on land, and in the winter, when temperatures drop sufficiently, they will hibernate in safe locations, such as under the soil under debris (fallen logs, rubble etc.), in tree stumps and amongst their roots or under dense leaf litter. Great Crested Newts have been recorded dispersing up to 1.3 km from breeding ponds, but the great majority of movement is over much shorter distances; typical dispersal between ponds in a meta-population is in the order of 250 m. Population viability and recruitment are concentrated within approximately 250 m of breeding ponds, and impacts beyond this distance are generally classed as Low under Section 6 of the GCN Mitigation Guidelines (English Nature, 2001).

5.3.3 Reasonable Avoidance Measures (RAMs) are used when a project has a low risk of harming great crested newts and impacts can be effectively avoided without needing a full mitigation licence. They form part of a precautionary approach to ensure legal compliance where newts may be present, but the likelihood of direct

impact is minimal. RAMs may be appropriate where no GCN have been recorded on site during surveys and the terrestrial habitat is sub-optimal. RAMs are often used when works can be scheduled outside the hibernation period (i.e., avoiding November–February). If works occur when newts are active (typically March–October), this reduces the chance of disturbing hibernating individuals underground.

5.3.4 If impacts are low and fully avoidable through RAMs, a GCN mitigation licence is not normally necessary. Natural England guidance highlights that a licence is only required when there is a likelihood of disturbing, injuring, or killing newts; or their breeding or resting places will be damaged or destroyed. Where impacts are minor, avoidable, and habitat quality is low, RAMs are the proportionate approach.

5.3.5 Completing the work in the breeding period would minimise the risk of encountering great crested newts or any other amphibians (as they will most likely be in the water during the daytime). Clearance of ground-level vegetation during the winter period when newts are hibernating will be avoided, as this is when newts are least active and the most vulnerable to harm.

5.3.6 The ideal period for clearance of ground-level vegetation is therefore between late July and the end of October (weather permitting) when newts will either be in the pond or on land. Work will not be carried out when night time temperatures drop consistently below 5°C, which is when newts will begin hibernating. The onset of this behaviour is highly variable and must be judged on a case-by-case basis but is likely to have started by November in most years.

5.3.7 The risk of impacts to Dormouse habitat is of a similar nature to that for Great Crested Newts: the small amount of hedge removal would not have a significant negative effect overall and the likelihood of a Dormouse being directly affected is negligible. A Reasonable Avoidance Measures approach would be suitable to control the residual risk. This would involve clearing the above-ground vegetation outside of the bird breeding season in winter, and grubbing out the hedge base in early spring or late autumn.

5.4. Biodiversity Net Gain

5.4.1 The project will be within the scope of the mandatory requirement to deliver 10% net gain under *Schedule 7A* of the *Town and Country Planning Act 1990* (as amended). There are no irreplaceable habitats within or adjacent to the site, and there has not been any degradation of on-site habitats prior to the relevant date (assumed to be on or after 30th January 2020). The 10% net gain requirement will apply to area habitats and hedgerows but not watercourses.

5.4.2 The mandatory requirements for the planning application comprise:

- A statement as to whether the application would be subject to the biodiversity gain condition: confirmed above in paragraph 5.4.1
- Confirmation of the presence or absence of irreplaceable habitats: there are no irreplaceable habitats
- Confirmation of whether any habitat degradation has taken place: there has been no unauthorised habitat degradation
- Consideration of how the Biodiversity Hierarchy (avoidance, mitigation or compensation of adverse effects) has been applied: net gain will be provided on-site
- A Plan, at an appropriate scale, showing the pre-development habitats within the red line application boundary at the time the application is made (or such earlier date as agreed): a copy of the habitat plan is provided in this report and as a standalone PDF
- A copy of the Statutory Metric showing the pre-development biodiversity units: a copy of the metric is provided

5.4.3 The application will deliver a net gain in habitats of greater than the mandatory 10%. The proposed post-development habitats within the red line boundary are shown in the following **Proposed Habitats Plan** overleaf.

5.5. Further Surveys

5.5.1 No further ecological surveys are recommended for the planning application.



0 50 100 m

Scale: 1:1500

Church Lane, Freshford | Freshford Community Farm Ltd

Proposed Habitats

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- Red Line Boundary
- Proposed Small Urban Tree
- Native hedgerow
- Species-rich native hedgerow with trees
- A — Allotments
- Artificial unvegetated, unsealed surface
- Developed land; sealed surface
- Modified grassland
- Other neutral grassland
- Traditional orchards
- P — Vegetated garden (Polytunnels)

Date: 29-04-2026
Author: Peter Stockting
Made with: QGIS 3.44.2-Solothurn

Base map from Google Satellite © 2026, Airbus, Maxar Technologies.



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