

Ecological Impact Assessment

Uplands, West Ashton Road,
Trowbridge

30 July 2026

Ecology
Arboriculture
Land Management





Report Details

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FINAL	30 July 2026	Anna Galvin BSc MSc	Luke Owen BSc	Nick Hargreaves BSc MSc MCIEEM	

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Site Details

Site Name and Location	Uplands, West Ashton Road, Trowbridge
Central OS Grid Reference	ST 86900 57450
Client	Hills Homes Development

Boundary



Executive Summary

Site Location	The Site is located east of B3105 West Ashton Road. The surrounding land use includes urban development to the north and west and agricultural fields to the south and east with a country park to the immediate southwest of the Site.
Proposals	Development proposals consist of the demolition of existing dwelling ('Uplands') and erection of 40 dwellings with associated public open space, landscaping and sustainable urban drainage system. The proposals also include removal of existing access and provision of new replacement vehicular access to West Ashton Road.
Survey Work	Desk-based study, extended UK Habitat Classification survey, bat activity survey, dormouse survey, great crested newt eDNA, badger survey, riparian mammal survey, ground level tree assessment of trees, and building inspection.
Designated Sites with Potential Impacts	Bath and Bradford on Avon Bats SAC, Salisbury Plain SAC, Green Lane Wood LNR, Biss Wood LWS and Green Lane Wood and Meadow & Smith's Well Wood LWS. The Site lies within the Bath and Bradford on Avon Bats SAC 1500m Bechstein's buffer and the Trowbridge and Westbury Bat Mitigation Strategy (TWBMS) Yellow Zone Medium Risk for habitat and Grey Hatched Zone Medium Risk for recreational pressures.
Baseline Habitats	The Site comprises an other neutral grassland field bounded by lines of trees, ornamental hedgerow, species-rich hedgerow, species poor hedgerow and a watercourse. There is also an existing house with associated vegetated garden and introduced shrub. Individual trees and a small discrete area of mixed scrub is also present.
Protected/notable Species	The Site is suitable for great crested newts (GCN), badgers, birds, bats including Annex II species, hedgehogs and riparian mammals.
Mitigation and Compensation	- A buffer to the southern boundary is proposed in line with Trowbridge and Westbury Bat Mitigation Strategy guidance to provide suitable new core bat habitat (15m) and dark buffer zone (10m); - Wildlife sensitive lighting scheme implemented in line with 'Bats and Artificial Lighting at Night (ILP & BCT, 2023) to ensure minimal light spill onto the boundaries and maintain the site's attraction to foraging bats and other nocturnal species; - Strategic payments for Habitat Mitigation and for Recreational Pressures as per the TWBMS; - Tree protection fencing will be installed prior to the commencement of construction to protect all retained hedgerows and trees, with an appropriate buffer designed in around root protection areas in line with BS5837:2012; - Landscaping to include native tree planting, mixed scrub, SuDS, and modified grassland within the Site; - Staged habitat removal will be conducted to encourage reptiles, hedgehog and amphibians to move off Site prior to construction commencing; - No vegetation to be removed during the nesting bird season (March to August inclusive) unless checked prior to removal by a qualified ecologist; - A Construction & Environmental Management Plan (CEMP) to be implemented in order to avoid and mitigate environmental impacts during construction.
Biodiversity Net Gain (BNG)	A separate BNG Statement and Assessment Report is provided (GE Consulting, 2026a).
Enhancements	20no. integrated bird boxes to be installed within the new dwellings (based on a 1:2 box per dwelling ratio); 20no. integrated bat boxes to be installed within the new dwellings (based on a 1:2 box per dwelling ratio); 4no. tree mounted bat boxes to be installed on individual trees; 2no. reptile/amphibian hibernacula; and - Hedgehog holes to be cut into all close board fencing.

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1 Introduction

This report presents the results of an Ecological Impact Assessment (EcIA) for Uplands, West Ashton Road, Trowbridge in relation to a full planning application. The report was commissioned by Hills Homes Development.

The area within the application boundary is hereafter referred to as the 'Site'.

1.1 Site Context

The Site is located east of the B3105 West Ashton Road. The surrounding land use includes residential urban development to the north and west and agricultural fields to the south and east with Biss Meadow Country Park to the immediate southwest of the Site.

1.2 Description of Proposed Development

Development proposals consist of the demolition of existing dwelling ('Uplands') and erection of 40 dwellings with associated public open space, landscaping and sustainable urban drainage system. Removal of existing access and provision of new replacement vehicular access to West Ashton Road (Ref: Proposed Site Plan, Ian Sullivan Architecture Ltd. 2026).

1.3 Aims

The aims of this report are to:

- 🦋 Identify and describe the habitats and species likely to be affected by the proposed development and assess the ecological value of these features;
- 🦋 Identify key ecological constraints to the proposed development and evaluate the significance of any potential effects; and,
- 🦋 Provide recommendations for mitigation and enhancement opportunities in accordance with relevant planning policy, legislation and other published guidance (see **Appendix 2**).

2 Methods

2.1 Ecological Scoping and Baseline Data Collection

2.1.1 Desk Study

A desk-based study was undertaken in June 2026 whereby:

- 🦋 Wiltshire & Swindon Biological Records Centre (WSBRC) was contacted for records of protected/notable species and sites designated for nature conservation value within a 2km radius of the Site boundaries;
- 🦋 MAGIC (www.magic.gov.uk) was searched for international designated sites (Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar) within 10km, Habitats of Principal Importance (HPI) and European Protected Species (EPS) Mitigation Licences within or adjacent to the Site;
- 🦋 Previous reports were reviewed with any relevant results provided in the appropriate sub-sections; and,
- 🦋 Aerial photography of the wider area was reviewed to identify possible important habitat features.

2.2 Field Surveys

Table 1 summarises the surveys undertaken to provide ecological baseline information for the Site. Full details are provided in the appendices. Surveys for breeding birds were scoped out because of the lack of functional link to any bird related protected sites. Reptile surveys were scoped out due to the lack of suitable habitat on Site.

Table 1: Summary of Baseline Data Collection Surveys

Survey Type	Date (s)	Relevant Appendix
Extended UK Habitat Classification Survey and Biodiversity Net Gain (BNG) condition assessment	May 2025	3
Bat Activity Surveys	April – October 2026	5
Dormouse Survey	May – September 2026	6
Great Crested Newt eDNA	May 2026	7
Ground Level Bat Roost Assessment of Trees	July 2026	8
Riparian Mammal Survey	May – September 2026	9
Building Inspection	May 2026	10

2.3 Biodiversity Net Gain Assessment

A baseline BNG assessment was undertaken using the statutory biodiversity metric (released in July 2025) to assess the pre-development and indicative post-development value of the habitats on Site following current guidance (Defra, 2025). Further details are provided in the BNG Statement and Assessment Report (GE Consulting, 2026a).

2.4 Baseline Evaluation and Impact Assessment

Determining the importance of ecological features was undertaken in accordance with the Chartered Institute of Ecology and Environmental Management's (CIEEM) Guidelines for Ecological Impact Assessment in the UK and Ireland (CIEEM, 2018). The guidelines recommend a scale of significance from International to Local ecological importance as a frame of reference, however, it also notes that it can be adapted to suit local circumstances. As such, where ecological receptors are assessed to be of less than Local value, an additional valuation of 'Site value' has been included.

An assessment was then made of possible ecological impacts of the proposed development on each feature within the development's likely 'Zone of Influence' (Zol). Where uncertainty exists, a precautionary approach has been adopted.

Measures are described to ensure that any impacts can be avoided, minimised or compensated for by applying the mitigation hierarchy in accordance with NPPF (2024) paragraph 193(a) which states:

"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."

2.5 Limitations

Care has been taken to ensure that balanced advice is provided on the information available and collected during the study period (s), and within the resources available for the project. However, the possibility of important ecological features being missed due to survey timings, absence during surveys or the year of survey cannot be ruled out. In addition, the lack of evidence or records of protected species on Site does not preclude their presence from Site.

3 Baseline Conditions & Evaluation

3.1 Designated Sites

A summary of designated sites within the search area is provided in **Table 2**.

Table 2: Designated Sites within 2km of Site boundary, 10km for European sites

Site Name	Proximity to Site	Description
<i>National Site Network ('European sites') and internationally designated sites</i>		
Bath and Bradford on Avon Bats Special Area of Conservation (SAC)	8km northwest	Annex II species that are a primary reason for selection of this site: 1304 Greater horseshoe bat <i>Rhinolophus ferrumequinum</i> This site in southern England includes the hibernation sites associated with 15% of the UK greater horseshoe population and is selected on the basis of the importance of this exceptionally large overwintering population. 1323 Bechstein's bat <i>Myotis bechsteinii</i> Small numbers of Bechstein's bats have been recorded hibernating in abandoned mines in this area, though maternity sites remain unknown. Annex II species present as a qualifying feature, but not a primary reason for site selection: 1303 Lesser horseshoe bat <i>Rhinolophus hipposideros</i>.
Salisbury Plain SAC/SPA	7.4km southeast	Annex I habitats that are a primary reason for selection of this site 5130 Juniperus communis formations on heaths or calcareous grasslands Salisbury Plain represents <i>Juniperus communis</i> formations near the southern edge of the habitat's range on chalk in southern England, where it is particularly rare. This site is the best remaining example in the UK of lowland juniper scrub on chalk. The juniper is juxtaposed with extensive 6210 semi-natural dry grassland and chalk heath. 6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) This site hosts the priority habitat type "orchid rich sites". Salisbury Plain in central southern England is believed to be the largest surviving semi-natural dry grassland within the EU and is therefore the most important site for this habitat in the UK.
<i>Statutory Designated Sites</i>		
Green Lane Wood LNR	0.77km east	Ancient (oak) woodland. Core Roost for SAC Bats (Bechsteins)
<i>Local Wildlife Sites</i>		
Green Lane Wood and Meadow & Smith's Well Wood LWS	0.36km east	A Wiltshire Wildlife Trust reserve with ancient semi-natural broadleaved woodland and a small area of meadow. Core Roost for SAC Bats (Bechsteins)
Biss Wood LWS	0.8km southeast	A small ancient semi-natural broadleaved woodland site on flat clay land, managed for conservation, mainly by coppicing. Core Roost for SAC Bats (Bechsteins)

Site Name	Proximity to Site	Description
Biss Meadows Country Park	0.02km west	An area of species-rich fen, grassland and scrub on the floodplain of the River Biss within the suburbs of Trowbridge.

3.2 Habitats and Flora

The distribution of habitats is shown on **Figure 1** and full details with photographs are provided in **Appendix 3**.

The Site comprises a single other neutral grassland field bound by species-poor hedgerows and lines of trees. The grassland was of low diversity but still qualifies as other neutral (see 3183-BNG-AG for further details). Given the low diversity of the grassland, it is considered of no more than **Local** importance. The hedgerows are a Habitat of Principle Importance (HPI) and are considered to be of **Local** importance. A watercourse is present along the southern boundary and was flowing during the site visit and therefore is considered to be of **Local** importance. Additionally, a small area of mixed scrub dominated by blackthorn is present to the east of the Site, due to its lack of diversity or optimal structure this is considered to be of **Site** importance. Introduced shrub and vegetated garden is present in the existing garden area associated with the house, these habitats are considered to be of **Site** importance. In addition, some small discreet modified grassland areas are present around the existing access. Due to the low diversity and current management these areas are considered to be of **Site** importance. Individual trees are present across the Site, with a group of semi-mature oak trees in association with the “garden” areas. These are considered to be of **Local** importance. The overall ecological value of the habitats on Site is of a **Local** importance.

3.3 Fauna

Full survey results are included in the relevant **Appendix** as per **Table 1** above.

3.3.1 Amphibians

WSBRC returned 12 records of GCN, the closest being 1.4km southwest of the Site boundary, and 11 records of common toad with the closest being 0.3km west of the Site.

No ponds are present on Site, however two ponds are present within 250m of the Site boundaries. The small watercourse to the south of the Site was considered unsuitable for GCN due to the fast flow of water, and potentially represents a barrier to dispersal for amphibian movements.

The majority of the Site does not provide suitable terrestrial habitat for GCN due to the uniform, short sward height to the grassland. However, the hedgerow bases do provide some opportunities for foraging, commuting and resting sites for GCN. It is anticipated that common amphibians (such as common toad) may use the Site in their terrestrial phase.

Surveys including both eDNA and HSI survey were conducted to determine the presence of great crested newt within the offsite ponds. The eDNA surveys returned negative results for both waterbodies and therefore great crested newt are considered **absent** from Site and are not considered further within this report. Details on these surveys can be found in **Appendix 7**.

3.3.2 Badger

WSBRC returned 15 records of badger with the closest being 1km to the east of the Site.

No evidence of badger was found during the Site walkover survey, however badgers are a highly mobile species and may utilise the Site on an opportunistic basis as part of a wider territory.

Badger are not listed as a Species of Principal Importance (SPI) for the conservation of biodiversity in England and has therefore not been assigned a scale of importance in this case, but will be considered further in this assessment in relation to their legal protection only.

3.3.3 Bats

Numerous records of bats were returned by WSBRC. Roost records for barbastelle, Bechstein's bat, Daubenton's bat, Natterer's bat, noctule, pipistrelle species, common pipistrelle, soprano pipistrelle, brown long-eared, greater horseshoe and lesser horseshoe were recorded within 2km of the Site with the closest being associated with Biss Wood c.0.7km southeast.

Bechstein's maternity roosts are associated with Biss Wood which lies 0.7km to the southeast of the Site and Green Lane Wood which lies 0.7km to the east of the Site.

Five European Protected Species Mitigation Licences (EPSL's) were returned within 2km with the closest being 0.6km northwest for the destruction of a common pipistrelle resting place.

The Site provides suitable habitat for roosting bats, namely the group of semi-mature oak trees within the "garden" area. Two trees were identified as having potential roosting features, with an additional tree offsite but extending into the Site. The location of these trees is shown on **Figure 7**.

The Site provides suitable commuting and foraging habitats in the form of the hedgerows, line of trees, watercourse and grassland. The hedgerows and tree lines provide connectivity to the wider landscape. The Site has been assessed as being of moderate suitability for commuting and foraging bats.

3.3.3.1 Roosting

The Site provides suitable habitat for roosting bats, namely the group of semi-mature oak trees within the "garden" area. Two trees were identified as having potential roosting features, with an additional tree offsite but extending into the Site. T10 and T15 are both semi-mature oak trees present within the group of trees to the north of the Site. Both of these trees feature woodpecker holes which have been classified as PRF-Ms and therefore have the potential to support multiple bats. Details of the ground level roost assessment for bats can be found in **Appendix 8**.

Five buildings (B1-B5) are present within the Site. B1, B2 and B3 all offer potential for roosting bats due to external access points being identified. An internal inspection of these buildings hasn't been carried out to date and therefore the categorisation of these buildings is outstanding. Further details on the external building inspection can be found in **Appendix 10**.

The roosting resource at the Site is considered to be of at least **Local** importance for roosting bats.

3.3.3.2 Commuting/foraging

The Site provides suitable commuting and foraging habitats in the form of the hedgerows, line of trees, watercourse and grassland. The hedgerows and tree lines provide connectivity to the wider landscape. The Site has been assessed as being of moderate suitability for commuting and foraging bats.

The Site lies within the Yellow Zone: Medium Risk sensitivity zone for habitat and the Grey Hatched Zone: Medium Risk sensitivity zone for recreational pressure as described in the Trowbridge and Westbury Bat Mitigation Strategy (TWBMS) (Wiltshire Council, 2025). See **Plate 1** and **Plate 2** below:

Plate 1: Extract from TWBMS showing the location of the Site within the Yellow Zone: Medium Risk (red star indicates Site location).

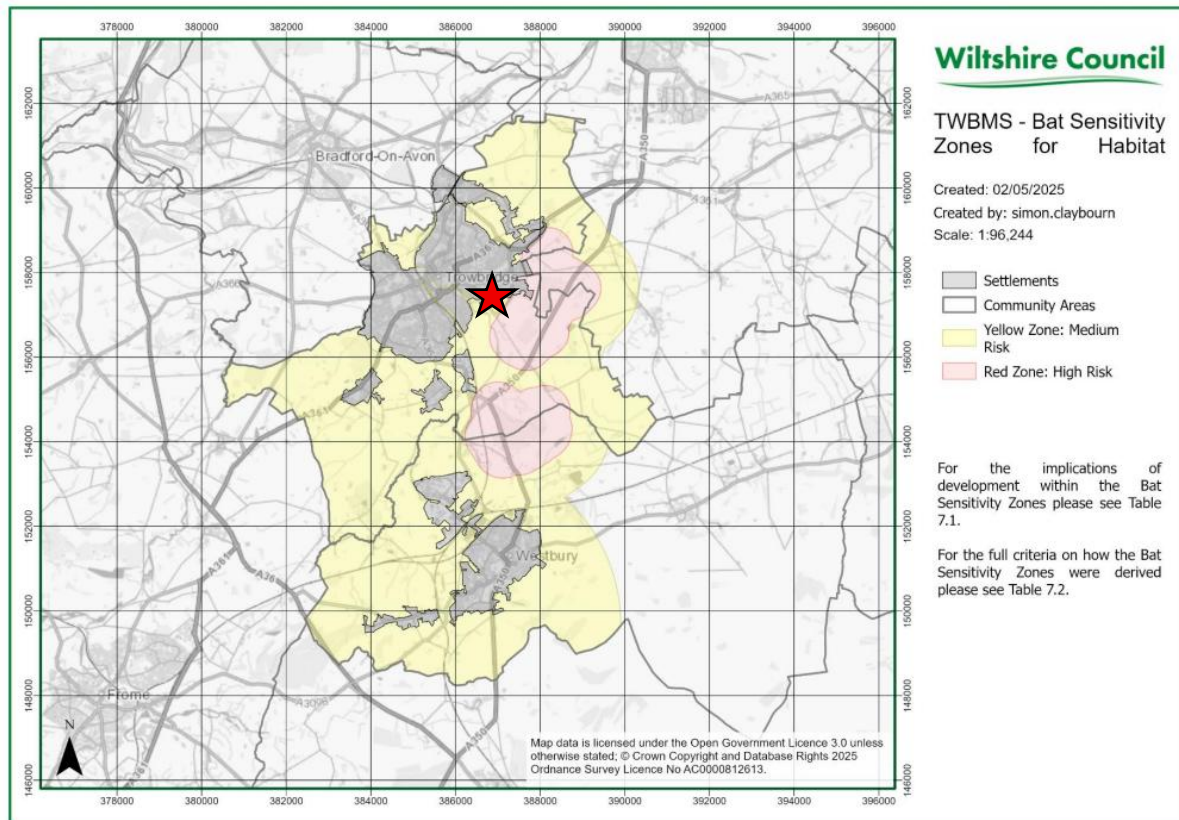
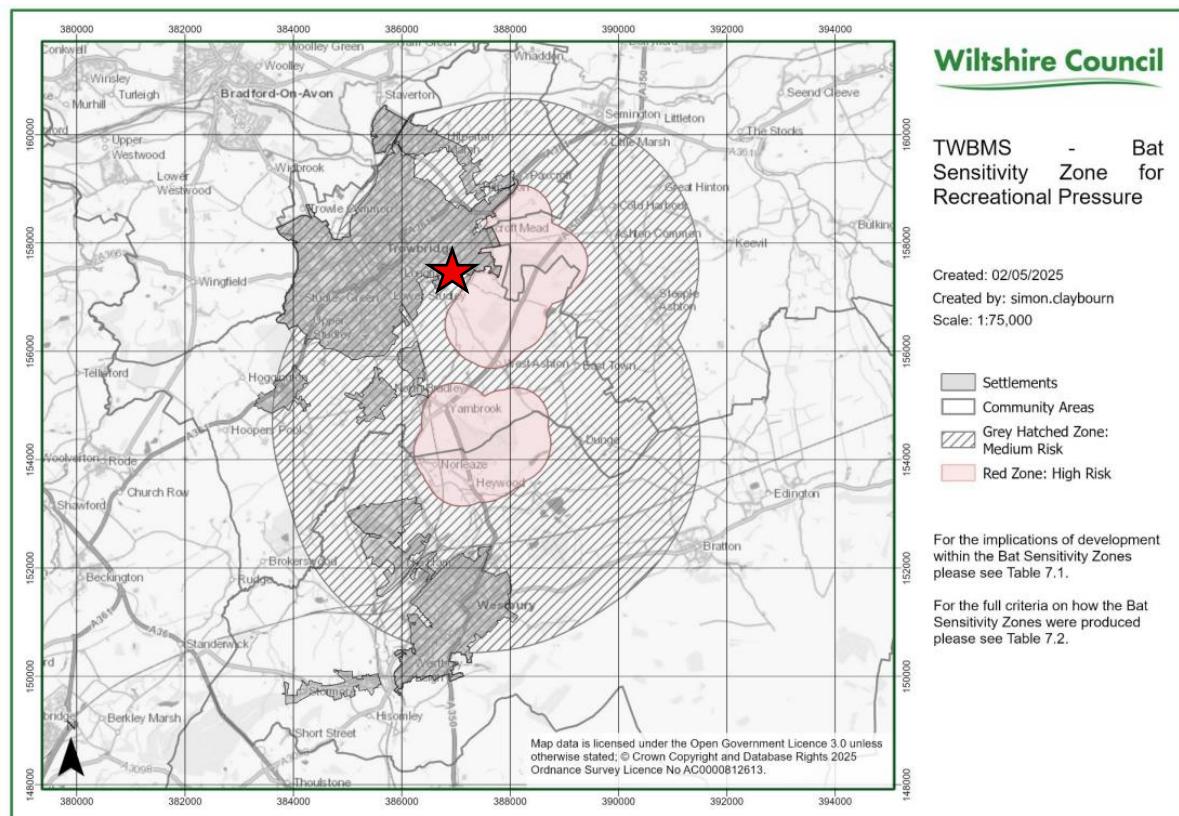


Plate 2: Extract from TWBMS showing the location of the Site within the Grey Hatched Zone: Medium Risk (red star indicates Site location).



Due to the suitability of habitats on Site and potential for Annex II Bats (Bechstein's and horseshoe bats) associated with the Bath and Bradford on Avon Bat SAC to be utilising the habitats, in accordance with the TWBMS, monthly Night-time Bat Walkover (NBW) surveys are currently being conducted between April and October 2026 with two surveys being completed within May and July. Automated detector surveys are also being undertaken at the same frequency. Further details can be found in **Appendix 5**.

At the time of writing, three night-time bat walkover surveys (NBW) have been conducted (April, May and June 2026). During these surveys, activity was dominated by common pipistrelle. Bat activity during the NBWs were consistent across the Site with the majority of passes being common pipistrelle.

To date, two automated detector surveys have been undertaken in April and May 2026, with the other eight surveys still outstanding. The full data set will be collected by October 2026. During the first two surveys, at least ten species were recorded. These are shown below in order of frequency:

- 🦇 Common pipistrelle (11,407 passes; 83.77%)
- 🦇 Soprano pipistrelle (1,205 passes; 8.85%)
- 🦇 *Nyctalus* species (421 passes; 3.09%)
- 🦇 *Myotis* species (207 passes; 1.52%)
- 🦇 Serotine (171 passes; 1.26%)
- 🦇 Long-eared species (124 passes; 0.91%)
- 🦇 Greater horseshoe (43 passes; 0.32%)
- 🦇 Barbastelle (28 passes; 0.21%)
- 🦇 Lesser horseshoe (8 passes; 0.06%)
- 🦇 Nathusius' pipistrelle (7 passes; 0.05%)

Static detector location and average numbers of passes per species for each location are shown in **Figure 4**.

Preliminary results from the NBWs and static detector surveys show that the vast majority of activity within the Site is attributed to common pipistrelle, which are considered common and widespread within the UK and are a light-tolerant species.

The assemblage of bats recorded during these surveys is considered to be fairly typical given the Site's geographic location and the habitats on and adjacent to the Site. Overall bat activity was dominated by pipistrelle bats and, with all other species combined accounting for c.7.42% of the total recorded activity with GHS and LHS representing 0.32% and 0.06% of total calls. Due to the difficulty in identifying *Myotis* bats to species level, they have been grouped together. They account for a cumulative 1.52% of total calls, a modest number considering that Annex II Bechstein's will likely account only for a proportion of that total. More common *Myotis* species (Natterer's and Daubenton's) and the more uncommon species (whiskered, Alcahloe, Brandt's), likely make up a larger proportion.

The activity surveys undertaken so far have found that the Site habitats offer a resource for a variety of species including Annex II bats that are associated with the SAC. However, taking into consideration the modest scale of the Site, its context in the landscape, its proximity to the SAC and the assemblage, and numbers of bats identified, there is no evidence to suggest the Site or any of its boundaries represent a significant/landscape commuting corridor for any of these species. As such the Site is considered to be of **Local** importance for bats.

3.3.4 Birds

WSBRC returned numerous records of birds, including those listed on the Red and Amber list for The Birds of Conservation Concern (BOCC 5). The Site provides suitable habitat for nesting birds in the hedgerows, tree lines, scrub and individual trees. Red and Amber species included on the BOCC 5 list which could be utilising the Site include wren, black-headed gull and greenfinch.

Due to the presence of suitable habitats on Site, the Site is considered to be of **Local** importance for breeding birds.

3.3.5 Hazel dormouse

No records of dormouse were returned by WSBRC. No EPSLs were returned for dormouse within 2km of the Site. While dormouse are present across Wiltshire, freely available records indicate their presence to the north east and Melksham, and south of Trowbridge at Yarnbrook and Westbury.

The Site provides suitable, nesting and foraging habitat within the hedgerows on Site. Connectivity to the wider landscape through hedgerows and woodland is present.

Dormouse nest tube surveys are to be conducted from May to September 2026 to determine the presence/absence of dormice on Site.

Due to the suitable habitat present, the Site is considered to be of at least **Local** importance for dormouse while the results of the surveys are outstanding.

3.3.6 Invertebrates

WSBRC returned numerous records of invertebrates within 2km of the Site.

The Site provides suitable habitat for common invertebrate species within the hedgerow, scrub, individual trees, vegetated garden and watercourse. Notable species recorded within 2km of the Site such as august thorn and oak hook tip moths may utilise the Site due to the presence of their food plants (oak trees). However, both of these species are considered common in southern England. There is no indication that a notable invertebrate assemblage could be supported and the Site is considered to be of **Site** importance.

3.3.7 Reptiles

WSBRC returned 21 records of slow worm, with the closest being 0.1km to the south of the Site and 11 records of grass snake, with the closest being 0.6km east of the Site.

The majority of the Site lacks suitability due to the uniform sward of the grassland. The grassland is routinely cut by the landowner and therefore the opportunities for reptiles are limited. However, some opportunities are present for common reptile species to utilise the hedgerow bases, scrub, watercourse and vegetated garden area. Due to the lack of suitable habitat, the Site is considered to be of no more than **Local** importance for reptile species.

3.3.8 Other Notable Species

Six records of otter were returned by WSBRC, with the closest record being 0.2km west of the Site boundary. Five records of water vole were returned by WSBRC, with the closest record being 0.4km east of the Site. All records are associated with the nearby River Biss. The watercourse to the south of the Site does provide some suitable aquatic habitat and is hydrologically connected to the River Biss and the aforementioned records.

Two riparian mammal surveys are to be conducted along the watercourse that bounds the Site. The first survey (May) returned evidence of water vole with latrines, feeding stations and burrows recorded. Further details can be found in **Appendix 9**. The Site is to be considered of **Local** importance for water vole and otter.

Numerous records of hedgehog were returned by WSBRC with the closest being adjacent to Site to the north. The hedgerows and small area of scrub provide some shelter and foraging opportunities to hedgehog (an SPI under Section 41 of the NERC Act 2006), as such the Site is considered to be of no more than **Local** ecological importance for these species.

4 Further Survey Work

The remaining survey work is scheduled to be undertaken in summer/autumn 2026. In addition, any changes to the proposed masterplan or if any significant amount of time has passed since the date of this report, a re-appraisal may be required.

5 Impact Assessment and Mitigation

5.1 Designated Sites

5.1.1 Bath and Bradford on Avon Bats SAC and Trowbridge and Westbury Bat Mitigation Strategy

The Bath and Bradford on Avon SAC lies approximately 8km to the north-west of the Site and is designated for its populations of greater horseshoe and Bechstein's bats as the primary reason for designation, with lesser horseshoe listed as a qualifying species but not a primary reason for designation. This SAC is primarily an underground site which provides stable hibernation conditions and swarming conditions for a significant number of the qualifying species.

The SAC includes the hibernation sites associated with 15% of the UK greater horseshoe bat population and is selected on the basis of the importance of this exceptionally large overwintering population. The SAC also supports small numbers of Bechstein's bats hibernating in abandoned mines, though maternity sites remain unknown.

Within Wiltshire, the key guidance document is the "Bath and Bradford on Avon Bat SAC Planning Guidance for Wiltshire". The guidance states *"In order to maintain the integrity of the SACs, it is important to protect the network of 'sensitive features' used by the designated bat populations (as set out in 3.1). These species can be highly mobile and although individual bats are known to occasionally migrate tens of kilometres between roost sites, there are a number of roosts where large numbers of these bats are known to regularly hibernate and breed. These have been identified as 'Core Roosts' for the purposes of this guidance."* Additionally, the landscapes surrounding these Core Roosts which are used regularly for foraging and commuting are also of particular importance and have been identified as 'Core Areas'. The size of these Core Areas is dependent upon the typical ranging behaviour of the species involved. The guidance document defines these as:

-  4km surrounding greater horseshoe Core Roosts;
-  2km surrounding lesser horseshoe Core Roosts;
-  1.5km surrounding Bechstein's Core Roosts; and
-  6km surrounding barbastelle Core Roosts (except at Mottisfont, where local evidence justifies a requirement for a 7.5km radius).

The Site lies within the Bechstein's 1500m buffer of the Bath and Bradford on Avon Bats SAC.

In addition, Wiltshire Council published an updated Trowbridge and Westbury Bat Mitigation Strategy in July 2025. The TWBMS was prepared in support of the now withdrawn Draft Wiltshire Local Plan Review 2020-2038 with an aim to provide a clear and detailed approach to considering the impact of development in the Trowbridge and Westbury area on the Bath and Bradford-on-Avon Bats SAC.

The Site falls within the Yellow Zone: Medium Risk bat sensitivity zones for habitat (see **Plate 1** above) and the within the Grey Hatched Zone: Medium Risk sensitivity zone for recreational pressure on the woodlands in which Bechstein's bats roost (see **Plate 2** above).

As the Site provides suitable commuting/foraging for all three species for which the SAC is designated, there is potential for Likely Significant Effects (LSEs) to occur to the population of the SSSI/SAC bats as the habitats may be functionally linked to SAC designated roost sites. The SAC Guidance (Wiltshire, 2015) identified a number of potential impacts from development within Core Areas including – Physical Changes; Lighting; Noise and Vibration; Recreational Disturbance; Pollution; and Mortality.

5.1.1.1 *Direct Impacts*

Due to the intervening distances between the Site and the Bath and Bradford on Avon Bat SAC, no direct impacts are anticipated. There is however the potential for indirect impacts to the Bath and Bradford on Avon SAC through three primary pathways – loss of supporting habitat for Annex II species; impacts from artificial lighting; and the impact of increased recreational pressures.

5.1.1.2 *Direct Loss of Foraging/Commuting Habitat and Fragmentation*

The proposals will necessitate the removal of c. 1.76ha of other neutral grassland, 0.17ha of vegetated garden and 0.03ha of introduced shrub. Whilst the grassland does not provide optimal foraging habitat for greater horseshoe bat or Bechstein's bat (both of which are woodland/hedgerow or pasture specialists), the loss of grassland will lead to a direct loss of foraging habitat for lesser horseshoe bats. Additionally, increased lighting and disturbance could occur that would impact Annex II species using the boundary hedgerows for commuting. Recreational pressures on woodlands where Bechstein's roosts are presents within the area (i.e. Biss Wood and Green Lane Wood) could increase due to the increase of residents in the area and as such increased use of woodlands for walking/leisure.

Due to the close proximity of the Site to the Bechstein's Core Roosts, it is likely that the species will be utilising the Site in some capacity. Accordingly, the proposed development is likely to adversely affect the qualifying interest features of the Bat SAC site (Bechstein's bat) during the construction and operational phase in lieu of the required mitigation detailed below.

Additionally, greater horseshoe bats and lesser horseshoe bats associated with the Bat SAC are likely to utilise the Site as both these species have been recorded during the automated detector surveys. Accordingly, the proposed development is likely to adversely affect the qualifying interest features of the designated site (greater and lesser horseshoe bats) during the construction and operational phase.

The TWBMS describes the mitigation measures considered appropriate for sites within the Yellow sensitivity zone as:

-  No net loss of habitat within the allocation of the Site boundary as demonstrated by the use of the Statutory Biodiversity Metric;
-  Retained core bat habitat remains connected to the wider habitat network and is adequately buffered;
-  Core bat habitat remains relatively undisturbed by the effects of urbanisation; and
-  A financial contribution is made towards funding the LPA scheme for mitigating residual in-combination effects from loss/degradation of bat habitat.

As required by the TWBMS, development within the yellow medium risk zone will be expected to firstly, fully mitigate on Site for the loss of habitat by ensuring no net loss, to be demonstrated by use of an established metric (preferably the Statutory Biodiversity Metric or subsequent version) based on best practice. The Statutory Biodiversity Metric has confirmed that no net loss of habitat is to occur within

the Site and that the additionality principle can be met as per government guidance¹ (Ref: 3183-BNG-AG – Whole Site, 3183-BNG-AG - Additionality and 3183-SBM-AG). This is being achieved by the enhancement of existing other neutral grassland, individual tree planting and new native hedgerows. The landscaping proposed will provide suitable foraging habitat and strengthen the already existing corridors through the Site.

In addition, as outlined above, the Site lies within the Yellow (Medium) Risk Zone and new developments must where appropriate, contribute to strategic habitat mitigation, which presumably would include SANG and other habitat provision, albeit this is not particularly clear. The TWBMS costs this at £972.03 per dwelling, which based on the scheme proposals of up to 40 dwellings would result in a cumulative contribution of £38,881.20 to be secured through section 106 agreement (s106), a section 111 agreement (s111) or unilateral undertaking (UU).

Cumulatively taking these measures will ensure that the scheme will not result in impacts to foraging/commuting bats associated with the Bath and Bradford on Avon Bat SAC.

The removal of habitats deemed necessary for the proposals, i.e. grassland, hedgerows and scrub, will reduce the foraging and commuting opportunities on Site. The landscape buffer and the creation of new core bat habitat and dark corridor to the southern boundary will allow the light-intolerant species currently utilising the existing habitats to continue to commute through the Site once developed.

In addition, the introduction of a variety of flowering planting on Site will encourage invertebrate populations and will, in turn, ensure a foraging resource for bats is present within the development.

A sensitive lighting strategy has been developed for the construction and operational phases by a lighting professional (DFL, 2026). The lighting scheme has been designed to ensure that no light is directed onto boundary hedgerows or bat and bird boxes. A suitable lighting scheme has been designed in accordance with the TWBMS to ensure the buffer to the eastern boundary remains unlit. Principles of the sensitive lighting scheme are outlined below and are in line with best practice guidance.

During the construction phase, the following mitigation measures will be implemented:

- 👉 All works will be undertaken during daylight hours, with works commencing no earlier than 30 minutes after sunrise and finishing no later than 30 minutes before sunset. No artificial lighting will be left on outside of normal working hours; and
- 👉 Where security lighting is required, it is recommended that these are motion activated with hooded luminaires, and these must be directed away from boundary hedgerows and bat and bird boxes.

During the operational phase, the following mitigation measures will be implemented:

- 👉 Luminaires will not be directed at sensitive habitats, boundary vegetation or onto bat and bird boxes. Where required, lights can be fitted with hoods, baffles or louvres to reduce back-spill;
- 👉 Only luminaires with an upward light ratio of 0% will be used, and low-level bollard lighting will be used where feasible to retain darkness above the luminaire;
- 👉 All external luminaires used on site will lack UV elements and will be warm-white coloured (<2700 Kelvin) to reduce blue-light components;
- 👉 LED luminaires will be used due to their sharp cut-off, lower intensity, good colour retention and dimming capability; and
- 👉 Where security lighting is installed this will be motion-activated.

It is therefore anticipated that the habitat retention and creation measures described will maintain the Site's capacity to support bats and could provide greater diversity and quality of habitats within the Site. The future management of the Site under the provisions of the HMMP will ensure successful

¹ <https://www.gov.uk/guidance/what-you-can-count-towards-a-developments-biodiversity-net-gain-bng>

establishment and long-term management of these features and have the potential to increase their value to foraging and commuting bats.

5.1.1.3 *Loss/ Disruption of Commuting/ Foraging Habitat through Indirect Impacts e.g. Lighting*

Both horseshoe species and Bechstein's bat associated with the SAC are generally light-averse woodland specialists, preferring to commute/ forage within woodlands, along the edges of woodlands or along glades and rides. In the absence of mitigation, lighting within the new development has the potential to cause disruption or loss of these commuting/ foraging routes and as such impacts upon SAC bats cannot be ruled out.

To minimise the impacts on commuting and foraging bats, all boundary vegetation will be retained, protected and suitably buffered as part of the scheme.

Additionally, a buffer to the southern boundary (LoT3) has been proposed in line with the TWBMS guidance. A 15m Zone A new core bat habitat will be created directly parallel to LoT3. This will need to consist of other neutral grassland, mixed scrub, and tree planting. A new species-rich hedgerow with hard board fencing will need to be installed along the 15m buffer, running parallel to LoT3. A 10m Zone B dark buffer is proposed parallel to Zone A to reduce the light levels. This will comprise other neutral grassland. This will allow the Site to continue to be used by commuting bats.

During operation, no lighting is to be directed at the hedgerows and woodland, allowing continuous corridors for bats to be maintained. Whilst a certain level of lighting throughout the Site is necessary for the health and safety of future residents, the strategy includes measures to reduce the impact of this lighting on local fauna including the identification of sensitive zones. The TWBMS recommends that a 15m new core bat habitat is created where lux levels must be less than 0.2 on the horizontal plane and below 0.4 on the vertical plane which is then buffered by a 15m dark corridor where light levels can reach a maximum of 1 lux.

As such, a 15m buffer has been proposed along the southern boundary to form the Zone A new core bat habitat through the creation of other neutral grassland, mixed scrub, individual trees and a species-rich hedgerow. Close board fencing can be utilised to contain any light spill and thus protecting the newly created core bat habitat as well as retaining and protecting the existing core bat habitat (line of trees and riparian corridor) should lighting design require it to maintain lux levels at that required within the TWBMS. The lux levels within the Zone A new core bat habitat will be less than 0.2 on the horizontal plane and less than 0.4 on the vertical plane (DFL, 2026). A 45+m buffer has been proposed parallel to Zone A to form the Zone B dark buffer zone. This dark corridor will also be less than 0.2 on the horizontal plane and less than 0.4 on the vertical plane west (DFL, 2026). These measures will ensure the baseline conditions are maintained, allowing the numbers of light-averse bats that are currently using the Site to continue to do so.

Best practice technology should be employed to reduce light-spill, for example LED lighting, luminaries with peak wavelengths higher than 550nm, no upward light-spill and/or a part-night lighting regime, in line with current guidelines (Bat Conservation Trust/ Institute of Lighting Professionals, 2023).

Any necessary external lighting throughout the Site will be designed with no spill to exceed the boundaries, particularly along the eastern boundary. Where brighter lighting is necessary, i.e. around parking spaces and primary footpaths, luminaires will be directional with no upward, sideways or outward spill and fitted with shields where necessary to maintain darker areas along the woodland edges.

5.1.1.4 *Disturbance during Construction Works*

Construction will be restricted to daylight hours, finishing at least 30 minutes before sunset and commencing at least 30 minutes after sunrise throughout the year. If this is not possible, no construction lighting will be allowed to spill onto the Site boundaries, ensuring light averse species can continue to utilise the Site during the construction period.

A Construction Ecological Management Plan (CEMP) will be produced providing details and mechanisms through which this area will be protected during construction.

5.1.1.5 *Increased Recreational Pressures*

The TWBMS highlights the potential for increased recreational pressures on woodlands which support bats associated with the Bath and Bradford on Avon Bat SAC. As such a ZoI has been developed around these roosts (the Grey Hatched Zone) within which, new residential development is expected to result in increased recreational pressure (and therefore adverse effects) on key woodland bat sites. The TWBMS requires that *“New residential development proposals for 50 or more houses within this zone will be expected to provide mitigation in the form of SANG / sufficient natural recreational focused greenspace; and new residential development proposals for less than 50 dwellings within this zone will be expected to make a financial contribution towards the delivery of strategic mitigation to address recreational pressure on the woodland sites”*.

Suitable Alternative Natural Greenspaces (SANGs) is the term given to greenspaces that are created or enhanced with the specific purpose of absorbing recreation pressure that would otherwise occur at designated nature conservation site, particularly European wildlife sites. SANGs are created, or existing greenspaces enhanced to create a SANG, in order to mitigate for the effects of new housing development, absorbing the level of additional recreation pressure associated with the new development. It is understood that this is in addition to the contributions being sought for ‘strategic’ bat habitat mitigation within the ‘Yellow Zone’, to mitigate for the loss of bat habitat, as opposed to recreational pressure.

The TWBMS requires that schemes of greater than 50 dwellings provide their own *“SANG / natural recreational focused greenspace”*, with schemes of less than 50 appropriately contributing via financial contributions to Wiltshire Council via s106/s111/UU at the rate as outlined in the TWBMS of £925 per dwelling.

Due to the scale and nature of the scheme, SANG as per NE’s definition cannot be provided on site (SANG sites ideally need to be in the order of 30ha). However, the scheme does provide extensive areas of both formal and informal open space. NE’s SANG guidelines require 8ha of open greenspace per 1000 new residents and is based on an occupancy level of 2.4 people per household. As such, the proposals are anticipated to result in on average 96 new residents. As such, each resident would require c. 0.008ha of open greenspace ($8\text{ha} / 1000 = 0.008\text{ha}$). Therefore, the scheme would be expected to provide c. 0.768ha of open greenspace ($96\text{ residents} \times 0.008\text{ha} = 0.768\text{ha}$).

As discussed above, scheme proposals will include extensive areas of formal and informal greenspace in excess of 3ha of open space, which is significantly in excess of the area required (0.768ha) as calculated above. As such, it is considered that the scheme is unlikely to result in increased recreational pressures upon the woodlands which support bats associated with the Bath and Bradford on Avon Bat SAC.

Furthermore, should this assessment not be agreed with by the LPA and NE, the scheme would still benefit from being below the 50-dwelling threshold as outlined within the TWBMS, and as such could

provide the aforementioned financial contributions in line with the TWBMS. Assuming up to 40 dwellings, this would comprise total contributions of £37,000.

5.1.2 *Salisbury Plain SAC and SPA*

The nearest site of international significance (Salisbury Plain SAC and SPA) is located approximately 7.5km south of the Site. It is possible that the development could cause indirect impacts on these sites through incremental increased recreational use. However, given the Site falls outside of the 6.4km visitor catchment, the scale of the proposed development and the availability of alternative recreational opportunities in closer proximity to the Site, it is considered that no likely significant effects on either statutory designated site will occur as a result of the proposed development.

5.1.3 *Other Statutory Designations*

No other statutory designations are considered likely to be impacted by the proposals.

Green Lane Wood LNR lies within 2km of the Site, forming a component of the Bath and Bradford on Avon Bats SAC and Trowbridge and Westbury Bat Mitigation Strategy. Therefore, the mitigation described above (**Section 5.1.1**) covers this Local Nature Reserve.

5.1.4 *Non-Statutory Designated Sites*

Green Lane Wood and Meadow & Smith's Well Wood LWS and Biss Wood LWS are both within 2km of the Site. Both Green Lane Wood and Biss Wood are components of the Bath and Bradford on Avon Bats SAC and Trowbridge and Westbury Bat Mitigation Strategy. Therefore, the mitigation described above (**Section 5.1.1**) covers these Local Wildlife Sites.

Biss Meadows Country Park lies directly west of the Site. It is anticipated that recreational pressures on this Country Park will increase due to the increase in local residents. However, as outlined above, the proposals consist of in excess of 3ha of public open space which will alleviate the pressure on the nearby Biss Meadows Country Park. SANG/sufficient natural recreational focused greenspace is not required for this scheme due to the number of dwellings being <50 (40). However, based on the recommendation of 8ha of open greenspace per 1,000 new residents/people as detailed in the guidelines on SANG creation, which is based on the average of 2.4 people per household, the number of dwellings proposed (40) results in an average occupancy level of 96 residents and would require 0.768ha. Therefore, this scheme is going above and beyond this recommendation.

5.2 *Habitats and Flora*

As outlined above, the proposals will necessitate the removal of c. 2.1615ha of other neutral grassland, 0.165ha of vegetated garden and 0.03ha of introduced shrub. Additionally, in the absence of mitigation there is some risk of degradation to retained habitats during enabling and construction from unsympathetic pruning, and root zone damage/compaction during construction. To avoid such impacts, Root Protection Areas (RPAs) will be identified, and suitable protective fencing installed where required in line with best arboricultural practice during construction (BS5837:2012). Standard airborne and water pollution prevention measures will be employed during construction. Such measures should be detailed within a Construction Environmental Management Plan (CEMP) which could be secured by an appropriately worded planning condition.

The loss of habitats within the Site do not pose an 'in principle' constraint to the development. Measures to restore and enhance existing habitats, to ensure successful establishment of new habitats, and to maintain the value of all ecological features in the long-term will be detailed within a Habitat

Management and Monitoring Plan (HMMP) which will be controlled through the Biodiversity Gain condition.

Specific measures in relation to existing habitats are detailed below. Some of the habitats present within the Site require further consideration in relation to supporting protected and notable species as further discussed below in **Section 5.3**.

The majority of hedgerows within the Site are to be retained and protected as part of the detailed proposals though an anticipated c. 50m will be lost in order to facilitate the scheme. This will predominantly comprise non-native ornamental hedgerow requires removal. The amount of hedgerow loss will be kept to the minimum required.

As outlined above approximately 2.1615ha of other neutral grassland is anticipated to be lost through the development of the Site. Due to the extensiveness of the other neutral grassland, this area cannot be feasibly retained in its entirety, and therefore areas of the retained other neutral grassland on Site will be enhanced in their condition. Therefore, no significant impacts are anticipated to other neutral grassland.

Approximately 0.023ha of modified grassland is anticipated to be lost through the development of the Site. Due to the small area anticipated to be lost and the extensiveness of the proposed enhancements to the retained grassland on Site, it is not considered to have a significant impact on modified grassland.

The small area of mixed scrub on the eastern boundary is proposed to be retained.

Individual trees are present across the Site, most notably east of the existing building. Trees will be retained (as far as possible) and suitably buffered. Therefore, limited impacts are anticipated on the trees on Site.

Small areas of introduced shrub along the existing driveway are anticipated to be lost. This is of low ecological value and will be compensated through various planting throughout the scheme. Therefore, no significant impacts are anticipated on introduced shrub.

The existing garden within Site is anticipated to be removed to facilitate the proposals. Similarly to introduced shrub, this holds low ecological value and will be compensated through various planting across the scheme, including extensive vegetated gardens.

5.3 Fauna

5.3.1 Amphibians

It is possible that common amphibians such as common toad may be present within the Site boundaries and hedgerows. As such, a suitable method statement will be employed to avoid significant impacts on common amphibian species during construction. This is discussed further below in relation to reptiles.

As detailed below, no suitable habitat for hibernating amphibians will be removed over winter (or in poor weather). In the extremely unlikely event that a great crested newt is found, all works will stop while Natural England is contacted for further advice. As detailed above in the baseline section, it is considered extremely unlikely that this species is present in the vicinity of the Site, and as such the risk to this species is considered negligible.

Hibernacula/resting places will be provided which will support these species in areas of POS (**Figure 2**).

5.3.2 Badgers

Badgers and their setts receive protection under the Protection of Badgers Act 1992, which protects them from deliberate harm and injury.

No badger setts were found on Site therefore it is considered that the species doesn't currently pose a constraint to the proposed development. However, mindful that badgers are highly mobile and frequently establish new setts the following precautionary measures are recommended:

- 🦡 Update badger survey of the Site no less than one month prior to works commencing;
- 🦡 Exclusion of badgers under a Natural England badger licence should any active setts be discovered that require removal/ disturbance during works; and
- 🦡 Good practice construction measures to ensure badgers are either unable to access the construction site or cannot become trapped in excavations (e.g. through covering up at night or inserting an 'escape ramp').

The habitat creation measures proposed across the Site would increase foraging opportunities for badgers, post-development.

5.3.3 Bats

All species of bat and their breeding sites or resting places (roosts) are protected under Regulation 41 of The Conservation of Habitats and Species Regulations 2017 (as amended) and Section 5 of the Wildlife and Countryside Act 1981 (as amended).

5.3.3.1 Roosting

Two trees were identified as having bat roosting potential within the Site boundary with an additional tree adjacent to Site. These trees were subject to ground level tree assessment, but no further surveys were conducted as no impacts are proposed.

Current proposals are to retain the trees identified to have bat roosting potential (T10 and T15) and for them to remain unlit. Additionally, the tree offsite along the southern boundary will remain unlit from the northern aspect.

It should be noted that bat roosts in trees are by their very nature difficult to identify, being hard to locate and often transient in nature. For example, features such as flaking bark (popular as a roosting site for some of our bat species) change in a relatively short period of time. Some of these relatively delicate and short-lived roost types are lost and others appear; hence tree roosting bats move between a number of roosts. Should it be found necessary to remove any trees e.g. for health and safety reasons, prior to commencement of works, the tree will be subject to ground-level inspection by a licenced ecologist. Should any features be identified, these will be inspected via endoscope, involving aerial assessments where necessary to identify presence/likely absence of roosting bats. In the event that evidence of roosting bats is identified, works will cease, and further information collected in order to inform a mitigation licence application to Natural England.

5.3.3.2 Commuting and foraging

The potential unmitigated impacts to bats during construction and operation are from disturbance from lighting leading to fragmentation of commuting corridors. Mitigation for these potential impacts is described above in **Section 5.1.1.3** and **5.1.1.4** above.

It is anticipated that habitat retention and enhancement measures can be designed in which will provide greater diversity and quality of habitats on the Site. The future management of the Site under the

provisions of a HMMP will ensure successful establishment and long-term management of these features and as such will increase their value to foraging and commuting bats.

5.3.4 Birds

In the absence of mitigation, there is a risk that the loss/fragmentation of the hedgerows and scrub will lead to a negative impact on the breeding bird population within the Site. In addition, if construction takes place during the breeding bird season, increased disturbance caused by construction noise, dust and vibration is likely to affect the ability of birds to hold territory and breed successfully within habitats adjacent to the works area. To mitigate for this, all hedgerows (with exception for losses to facilitate access) will be retained and protected as part of the development. Retained hedgerows will be clearly marked through Heras fencing (or similar) and will be subject to regular checks throughout construction to ensure they are still intact.

New hedgerow planting, other neutral grassland, orchard and tree planting will be created within the Site to compensate for the loss of suitable breeding bird habitat. This will provide a number of new opportunities for breeding and foraging once established.

Given the protection afforded to all breeding birds, their nests, eggs and young, any vegetation clearance, including the future management of habitats, should be undertaken outside of the breeding bird season (March to August inclusive). If this is not practicable, then works should be preceded by a nesting bird check by a suitably qualified ecologist within 48 hours of the commencement of works. If nesting birds are found to be present then an appropriate buffer will be implemented around the nest, in which no works can take place until all birds have fledged.

5.3.5 Reptiles

Common species of reptile are protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended). This makes it illegal to intentionally kill or injure them. In addition, all native species of reptile are SPIs under the NERC Act 2006.

The Site has some potential to support common species of reptile and so should be considered. As a precaution, during construction and enabling works, a precautionary approach to the removal of suitable habitats, including sensitive timings and phased habitat clearance, will be adopted.

- 👉 Habitat manipulation will be undertaken to encourage reptiles to disperse to areas of retained habitat around Site margins and beyond the boundary hedgerows. These works will only be undertaken during the reptile active season of April to October inclusive, in suitable weather conditions when temperatures exceed 10°C;
- 👉 Habitat suitability will be reduced by strimming vegetation using a staged cutting process;
- 👉 Initially, the grassland margins and hedgerow vegetation will be cut to approximately 150mm, (starting from the south and working north) with the arisings removed and habitats left for a minimum of 48 hours in suitable weather conditions i.e. no rain or high winds;
- 👉 A further cut will then be made to 50mm, beginning at one end of the Site and moving in one direction (from south to north), to encourage any remaining reptiles/ amphibians towards the retained areas of suitable habitat; and
- 👉 Once complete, the vegetation will be maintained at a low-level (<50mm) until the start of development works.

5.3.6 Hedgehog

During the construction and enabling works, there is potential to harm hedgehog. The measures outlined above for reptiles and badgers will also ensure that hedgehogs will be safeguarded. Any

individuals encountered during enabling works will be moved to a place of safety, namely the southern boundary.

The retention of the majority of hedgerows will ensure foraging and commuting opportunities on Site are maintained. Close board fencing within the development will incorporate 15cmx15cm holes at bases to allow site permeability for the species.

5.3.7 *Invertebrates*

Although a notable invertebrate assemblage is not considered likely to be present within the Site, the habitats within the Site do provide suitable habitat for invertebrates.

Without appropriate mitigation, the loss and/or fragmentation of the hedgerows and associated trees and other neutral grassland has the potential to negatively impact any invertebrate assemblage that is present within the Site. To mitigate for this, the majority of hedgerows will be fully retained and protected as part of the scheme.

New habitats will be created within the Site to compensate for the loss of suitable invertebrate habitat. Habitats to be created will comprise hedgerows, orchard, mixed scrub and individual trees.

With the proposed mitigation and compensation measures no significant impacts are anticipated for invertebrates, with the measures proposed considered to represent an enhancement for invertebrates within the Site.

5.3.8 *Riparian Mammals*

Water voles are protected under the Wildlife and Countryside Act, 1981 (as amended). As such it is an offence to intentionally kill, injure or take a water vole. It is also an offence to intentionally or recklessly damage or destroy a structure of place used for shelter or protection, disturb them in a place used for shelter or protection or to obstruct access to a place used for shelter or protection.

Otters are protected under the Conservation of Habitats and Species Regulations, 2017 and the Wildlife and Countryside Act, 1981 (as amended) and are a Species of Principal Importance (SPI). It is an offence to deliberately capture, kill, injure or disturb otters, or to damage or destroy their breeding sites or resting places

During construction, mitigation measures will be implemented to avoid and minimise impacts on water vole, otter and their habitat. A sensitive working buffer of 10m will be established around the watercourse, within which no vegetation clearance or ground disturbance will occur unless under ECoW supervision.

Site staff will receive a toolbox talk to raise awareness of water vole and otter legal protection and mitigation requirements, and pollution prevention measures will be implemented to maintain water quality throughout the construction period.

Newly created habitats will ensure the existing population of water vole can continue to utilise the river corridor through the development once operational as well as any potential otter population.

With the proposed mitigation measures, no significant impacts on riparian mammals are anticipated.

6 Summary of Assessment and Mitigation

Figure 2 summarises and illustrates the avoidance, mitigation and compensation measures required to minimise significant impacts to ecological features. This demonstrates that the mitigation hierarchy has been adhered to by focusing on the **avoidance** of ecological features of greatest importance, mitigating unavoidable impacts and, as a last resort, providing **compensation**.

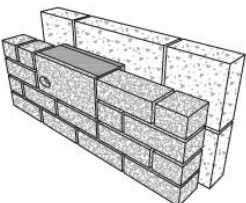
7 Biodiversity Net Gain

The baseline units for the Site comprise 26.67 habitat units, 4.38 hedgerow units and **TBC** watercourse units. An indicative BNG assessment suggests that the Site is likely to be capable of delivering 10% onsite. Further details are provided in the BNG Statement and Assessment Report (GE Consulting, 2026a), which provides the BNG information required to support the planning application under Article 7 of The Town and Country Planning (Development Management Procedure) (England) Order 2015 as well as local information required by Wiltshire LPA, and in the submitted statutory biodiversity metric (GE Consulting, 2026b).

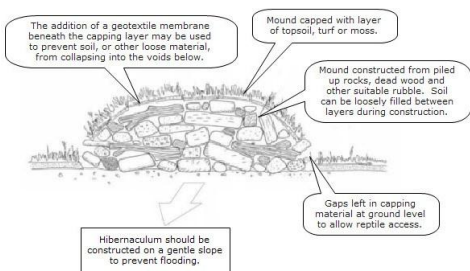
8 Protected/Notable Species Features

The following enhancements features detailed in **Table 3** are required in line with national guidance and local planning policy. Locations are shown in **Figure 2**.

Table 3: Enhancement Features

Quantity & Type	Illustrations	Description & Installation
20no. integrated bird nest boxes	 WoodStone Build-in Swift Nest Box Deep (nhbs.com)  Afs 'S' brick 	- Density: an average of one box per two dwellings (clustered). - Fully integrated boxes to be built into the fabric of the building. These are more secure and eliminate future maintenance requirements. - Suitable models include the PRO UK Rendered Build-in Swift Box, WoodStone Build-in Swift Nest Box Deep or the Action for Swifts (Afs) 'S' brick which can be chosen to suit the finish of the building. Suppliers include nhbs.com, wildcare.co.uk and actionforswifts.com/. - Swift boxes are recommended as they are considered a universal box suitable not only for swifts but also for house sparrows and other small birds (CIEEM, 2021). - Install at the highest point of the building, ideally at least 5m above ground level. - To be sited under the shelter of eaves or overhanging roofs where possible, avoiding locating above doors and windows. - Entrance out of direct sun and the prevailing weather and away from

Quantity & Type	Illustrations	Description & Installation
	Installation – integral nestbox installed in outer leaf of brickwork in a traditional cavity wall construction	perches/ledges where birds are at risk from predators. Ensure a clear flyway of ideally at least 5m, avoiding obstructions such as trees. See swift-conservation.org for additional advice.
20no. integrated bat boxes	 Vivara Pro Build-in Woodstone Bat Box and Habibat Bat Box  Installation	- Density: one box per two dwellings. - Fully integrated boxes to be built into the fabric of the building. Install within the cavity of house walls. The entrance hole can sit flush to a course of bricks. - Suitable models include the Vivara Pro Build-in Woodstone Bat Tube, Habibat Bat Box or similar approved which can be chosen to suit the finishing of the building. Suppliers include www.nhbs.com and www.wildcare.co.uk. - Position a minimum of 3m above the ground. - Locate where there is a clear, unlit flight path for bats to linear vegetation (e.g. hedgerows) and away from windows. Install away from any artificial light sources, to prevent light spill illuminating the boxes.
4no. building/tree mounted bat box	 Schwegler 2F bat box  Low Profile WoodStone Bat Box	- To be externally mounted on trees at a height of at least 3m above ground level. - Fix securely to an open section of tree trunk. - Boxes are to be made of a durable material such as woodstone or woodcrete. - Suitable models include the Schwegler 2F bat box, Low Profile WoodStone Bat Box or similar approved. Suppliers include www.nhbs.com and www.wildcare.co.uk. - Locate where there is a clear, unlit flight path for bats to linear vegetation (e.g. hedgerows) and away from windows. Install away from any artificial light sources, to prevent light spill illuminating the boxes.

Quantity & Type	Illustrations	Description & Installation
2no. hibernaculum/ habitat piles	 The addition of a geotextile membrane beneath the capping layer may be used to prevent soil, or other loose material, from collapsing into the voids below. Mound capped with layer of topsoil, turf or moss. Mound constructed from piled up rocks, dead wood and other suitable rubble. Soil can be loosely filled between layers during construction. Gaps left in capping material at ground level to allow reptile access. Hibernaculum should be constructed on a gentle slope to prevent flooding. Example hibernaculum design	- Provide hibernacula/ habitat piles for fauna such as reptiles, mammals and invertebrates. - Constructed from dead wood and rubble, topped with loose soil and turf. Dimensions to be a minimum of 2m length x 1m width x 1m height. - Located in suitable locations such as within the southern area in a relatively undisturbed area on the Site boundaries.
Hedgehog holes	 Example hedgehog hole and sign  Gravel board with in-built hole	- Include c.13cm x 13cm cut out through all close-boarded fences or walls (where levels allow) to allow hedgehog movement throughout Site. - These can be holes created during fence construction, or purpose-made products such as the Durapost Hedgehog Hole and Hedgehog Gravel Boards (or similar) available from suppliers including www.jacksonsfencing.co.uk or www.ibstock.co.uk/. - To reduce the risk of these being blocked by future residents, a small 'Hedgehog Highway Sign' should be attached. Available from www.nhbs.com. - Further information is available at: https://www.hedgehogstreet.org/help-hedgehogs/link-your-garden/

9 Monitoring

Monitoring should be undertaken to ensure that the mitigation described in this report has been undertaken to a satisfactory standard. This applies to both the construction and operation phases of the development. Details and frequency will be provided within the HMMP, which will be a 'live' document and subject to regular updates and iterations, or the method statement for any mitigation licences required to ensure successful establishment and delivery of mitigation and enhancement measures.

10 Conclusions

In summary the Site is of moderate ecological interest, comprising other neutral grassland, mixed scrub, existing hard standing, introduced shrub, vegetated garden and individual trees which is bound by native hedgerows and line of trees as well as non-native ornamental hedgerows. It is located in the vicinity of Salisbury Plain SAC/SPA and Bath and Bradford on Avon Bats SAC. In the absence of mitigation, negative impacts are possible to several ecological receptors, namely bats.

Mitigation and compensation have been incorporated into the design to ensure that the proposal and work programme is designed to minimise adverse impacts on ecological features. Measures included

within a CEMP would protect a range of ecological features during the construction phase of the development. Created habitats would be protected and maintained as defined within a HMMP as part of the BNG assessment.

Enhancement features have also been described with the aim of providing an increase in wildlife opportunities on Site post-development, contributing to the aims of National Planning Policy Framework and local policy. An indicative Biodiversity Metric has been supplied which shows a net gain in habitat units is likely achievable on Site. The assessment will be updated based on final plans for the development, as part of the pre-commencement BNG condition.

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Key:

- Site Boundary
- Existing Large Rural Tree
- Existing Medium Rural Tree
- Existing Small Rural Tree
- Non-native and ornamental hedgerow
- Line of trees
- Native hedgerow
- Developed land; sealed surface
- Introduced shrub
- Mixed scrub
- Modified grassland
- Other neutral grassland
- Vegetated garden

Scale at A4: 1:2,500



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Figure 1:
On-site Baseline Habitat Plan

Project:
Uplands, West Ashton Road, Trowbridge

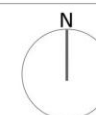
Client:
Hills Homes Development

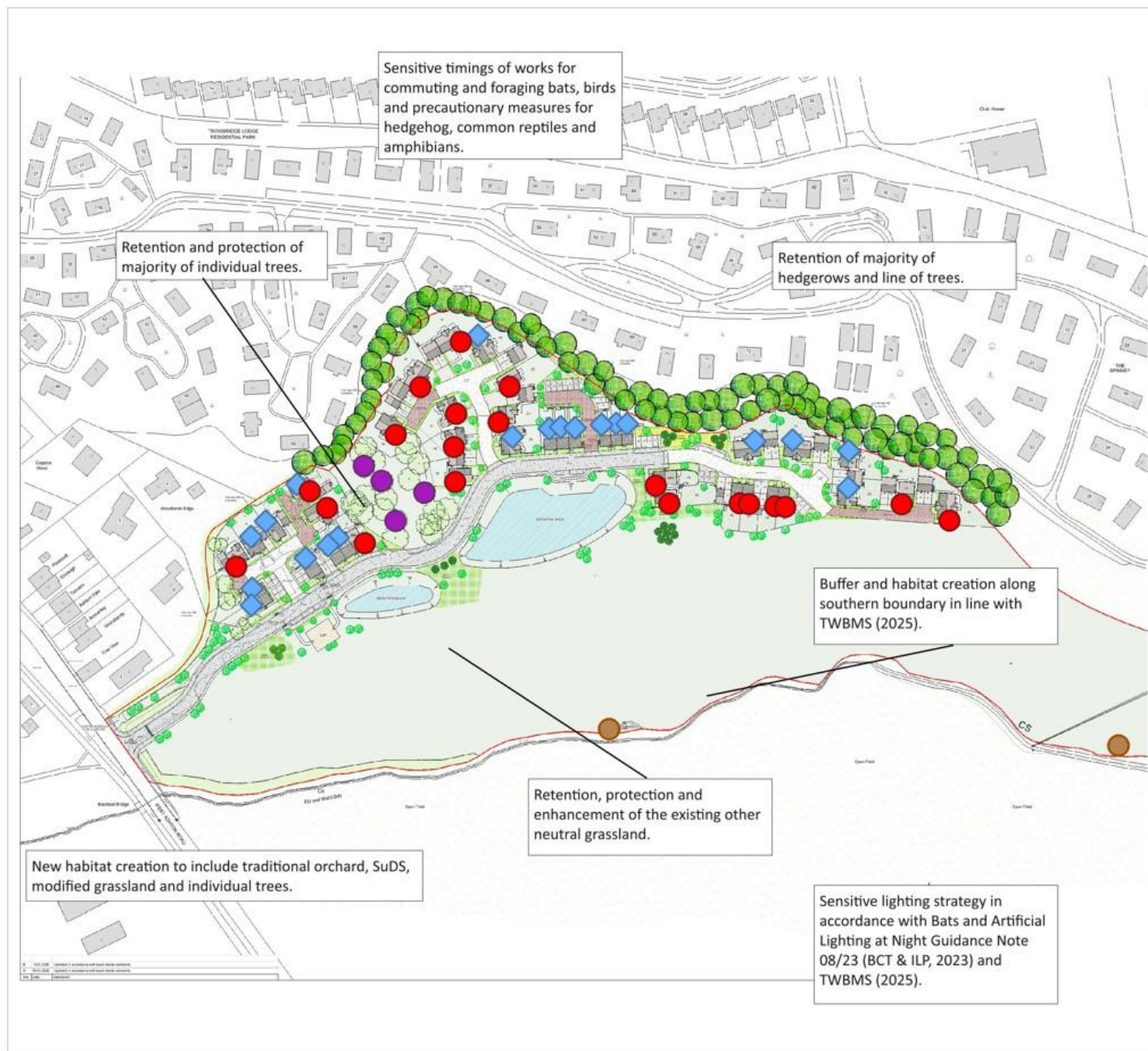
Date:
28/5/2026

Ref:
3183-EclA-F1

Drawn:
AG

Revision:
-





Key:

- 2no. Habitat Piles
- 20no. Integrated Bat Box
- 20no. Integrated Bird Box
- 4no. Tree Mounted Bat Box

Hedgehog holes to be included in all close boarded fences to allow hedgehog movement throughout the Site.

Proposed Site Plan (Ian Sullivan Architecture Ltd, 2026)

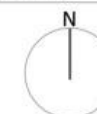
Figure 2:
Enhancements and Mitigation

Project:
Uplands, West Ashton Road, Trowbridge

Client:
Hills Homes Development

Date:
28/5/2026
Ref:
3183-EclA-F2

Drawn:
AG
Revision:
-





Key:

 Site Boundary

 Key Foraging Areas

→ Bat Transect

Transect Start Points

① 1

② 2

NBW results

● Common pipistrelle

● Soprano pipistrelle

● Barbastelle

● Nathusius' pipistrelle

● Nyctalus species

● Serotine

● Myotis species

● Lesser horseshoe



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Figure 3:
Night-time Bat Walkover Survey Results

Project:

Uplands, West Ashton Road, Trowbridge

Client:

Hills Homes Development

Date:

24/6/2026

Ref:

3183-EclA-F3

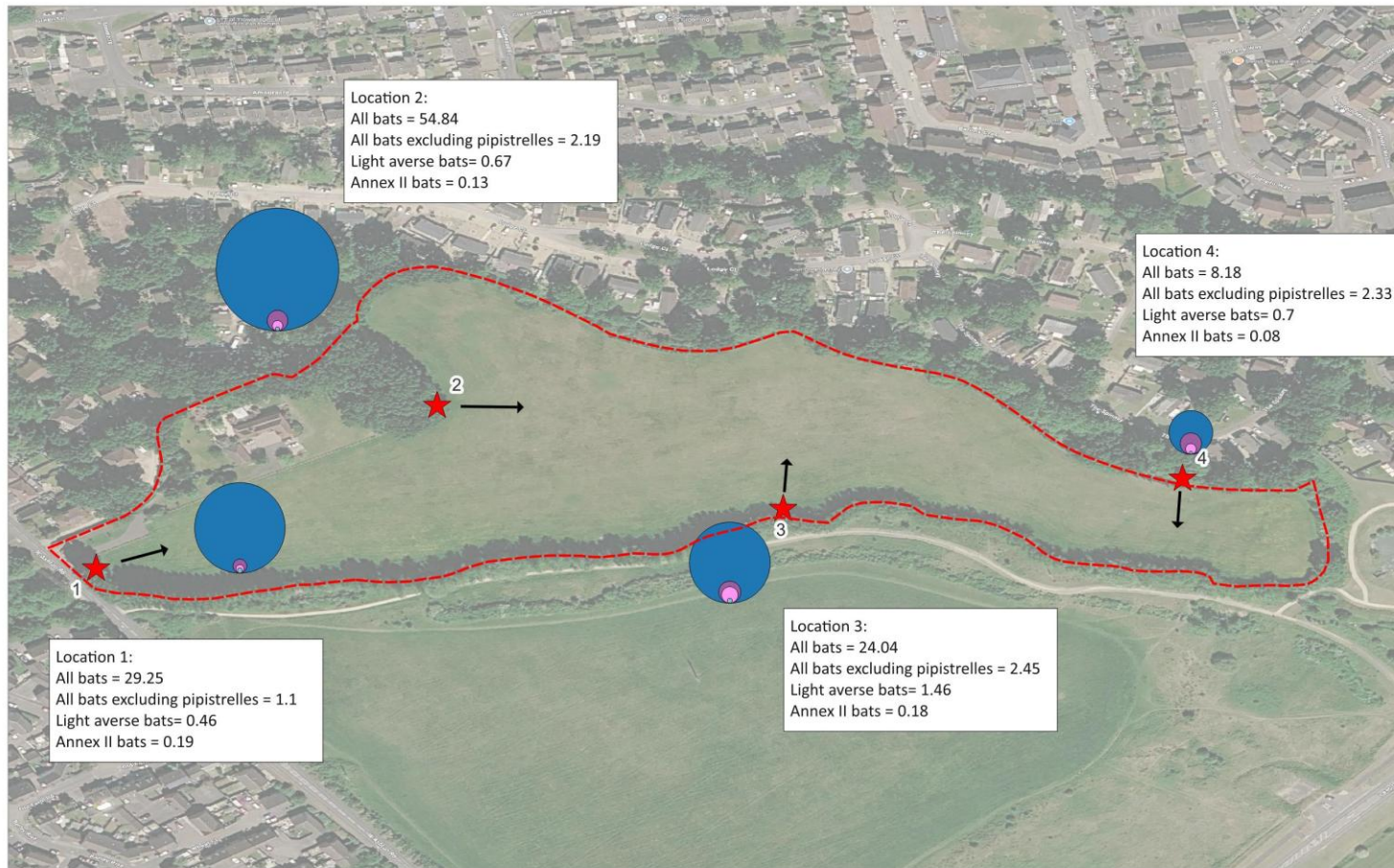
Drawn:

MW

Revision:

-





Key:

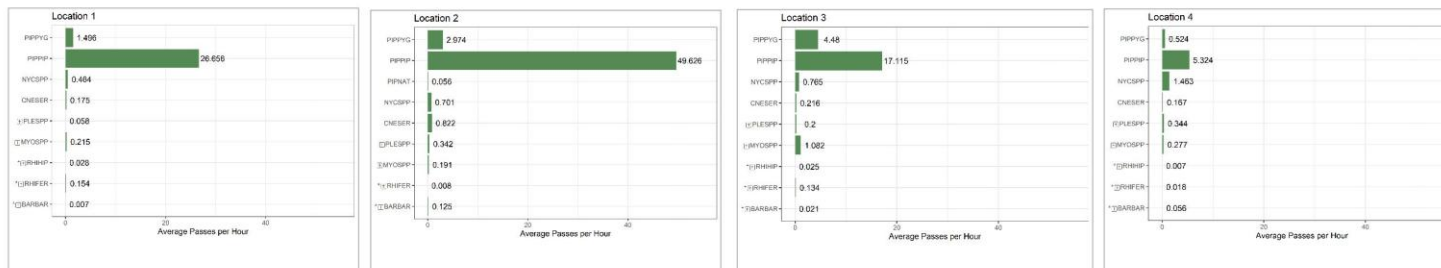
- Site Boundary
- ★ Static Locations
- Static Direction
- All Bats
- Excluding Pipistrelle species
- Light averse species
- Annex II

Circles are indicative of the average number of bat passes per hour for monthly surveys conducted in April



Imagery ©2026 CNES / Airbus, Getmapping plc, Infoterra Ltd & Bluesky, Maxar Technologies. Map data ©2026 Google

Graphs show the average number of passes per hour for each species across the survey season at each location. Annex II bat species are indicated with an "A".



PIPPIP= Common pipistrelle; PIPPIYG= Soprano pipistrelle; NYCSPP= Nyctalus species; CNESE= Serotine; PLESPP= Long-eared species; MYOSPP= Myotis species; RHIHIP= Lesser horseshoe; RHIFER= Greater horseshoe; BARBAR= Barbastelle

Figure 4:
Automated Bat Detector Survey Results

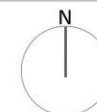
Project:
Uplands, West Ashton Road, Trowbridge

Client:
Hills Homes Development

Date:
24/6/2026

Ref:
3183-EclA-F4

Drawn:
MW
Revision:
-





Key:

- Site Boundary
- Dormouse Tubes



Imagery ©2026 CNES / Airbus, Getmapping plc, Infoterra Ltd & Bluesky, Maxar Technologies. Map data ©2026 Google

Figure 5:
Dormouse Tube Locations

Project:
Uplands, West Ashton Road, Trowbridge

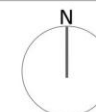
Client:
Hills Homes Development

Date:
28/5/2026

Ref:
3183-EclA-F5

Drawn:
AG

Revision:
-





Key:

-  Site Boundary
-  Pond

Scale at A4: 1:5,110



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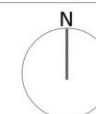
Figure 6:
Pond Locations and Results

Project:
Uplands, West Ashton Road, Trowbridge

Client:
Hills Homes Development

Date:
28/5/2026
Ref:
3183-EclA-F6

Drawn:
AG
Revision:
-





Key:

- Site Boundary
- Potential Roost Feature - Multiple Bats

Scale at A4: 1:2,500



Imagery ©2026 CNES / Airbus, Getmapping plc, Infoterra Ltd & Bluesky, Maxar Technologies. Map data ©2026 Google

Figure 7:
Ground Level Tree Assessment for Bats Results

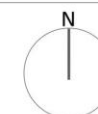
Project:
Uplands, West Ashton Road, Trowbridge

Client:
Hills Homes Development

Date:
28/5/2026

Ref:
3183-EclA-F7

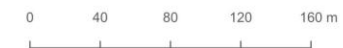
Drawn:
AG
Revision:
-





Key:

- Site Boundary
- ▲ Water vole evidence



Imagery ©2026 CNES / Airbus, Getmapping plc, Infoterra Ltd & Bluesky, Maxar Technologies. Map data ©2026 Google

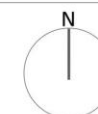
Figure 8:
Riparian Mammal Survey Results

Project:
Uplands, West Ashton Road, Trowbridge

Client:
Hills Homes Development

Date:
28/5/2026
Ref:
3183-EclA-F8

Drawn:
AG
Revision:
-





Key:

 Site Boundary

 Building with Low Bat Roost Potential

 Building with Negligible Bat Roost Potential

Internal building inspection required to determine final categorisation.



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Figure 9:
Building Locations

Project:
Uplands, West Ashton Road, Trowbridge

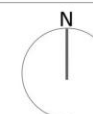
Client:
Hills Homes Development

Date:
28/5/2026

Ref:
3183-EclA-F9

Drawn:
AG

Revision:
-



Appendix 1 – General Glossary of Terms

Annex I	Threatened bird listed on Annex I of the EC Birds Directive/ Habitats listed on Annex I of the EC Habitats Directive
Annex II	Species of community interest whose conservation requires the designation of SACs
BAP	Biodiversity Action Plan
BMCL	Bat Mitigation Class Licence
BNG	Biodiversity Net Gain
BoCC	Bird of Conservation Concern
CEMP	Construction Environmental Management Plan
CWS	County Wildlife Site
DBW	Daytime Bat Walkover
EPS	European Protected Species
GLTA	Ground Level Tree Assessment
HPI	Habitat of Principal Importance required under Section 41 of the NERC Act 2006
HSI	Habitat Suitability Index
HMMP	Habitat Management and Monitoring Plan
IRZ	Impact Risk Zone
GCN	Great crested newt
JNCC	Joint Nature Conservation Committee
LBAP	Local Biodiversity Action Plan
LEMP	Landscape and Ecology Management Plan
LPA	Local Planning Authority
LWS	Local Wildlife Site
MMU	Minimum Mapping Unit
NBW	Night-time Bat Walkover
NE	Natural England
NERC Act	Natural Environment and Rural Communities Act 2006
NPPF	National Planning Policy Framework
NVA	Night Vision Aid
NVC	National Vegetation Classification Survey
OSWI	Other Site of Wildlife Interest
pCWS	Potential County Wildlife Site
POS	Public Open Space
PRA	Preliminary Roost Assessment
PRF	Potential Roost Feature
Ramsar	A wetland site designated to be of international importance under the Ramsar Convention
RPA	Root Protection Area
SAC	Special Area of Conservation
SPA	Special Protection Area
SPI	Species of Principal Importance required under Section 41 of the NERC Act 2006
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage Systems
UKHab	UK Habitat Classification System
UWS	Unconfirmed Wildlife Site
WCA	Wildlife and Countryside Act 1981(as amended)
ZOI	Zone of Influence

Appendix 2 – Planning Policy and Legislation

Habitat and Species Legislation

Species and habitats receive legal protection in the UK under various legislation, including:

- 👉 The Wildlife and Countryside Act (WCA) 1981 (as amended);
- 👉 The Conservation of Habitat and Species Regulations 2017 (as amended);
- 👉 The Countryside Rights of Way (CROW) Act 2000;
- 👉 The Hedgerows Regulations 1997;
- 👉 The Protection of Badgers Act 1992; and
- 👉 The Natural Environment and Rural Communities (NERC) Act 2006.

Where relevant, this report takes into account the legislative protection afforded to specific habitats and species.

Environment Act 2021

The Environment Act 2021 operates as the UK's legal framework for environmental protection and provides legislation on environmental governance, principles, targets and improvement plans, waste and resource efficiency, nature protection, and water and air quality.

Part 6 of the Environment Act 2021 requires a minimum 10% biodiversity net gain for all new developments (with specified exemptions), and amends Schedule 7a (Biodiversity Gain in England) of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021) to mandate this in England. This will apply to most major developments from 12th February 2024 and to small sites from 2 April 2024.

The biodiversity net gain regulations most directly relevant to planning are:

- 👉 The Environment Act 2021 (Commencement No. 8 and Transitional Provisions) Regulations (2024)
- 👉 The Biodiversity Gain Requirements (Exemptions) Regulations (2024)
- 👉 The Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations (2024)
- 👉 The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations (2024).

In addition, there are regulations for the Biodiversity Gain Site register established under section 100 of the Environment Act 2021 for registered off-site biodiversity gains.

National Planning Policy Framework

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how local planning authorities should incorporate them into their own policies and plans. Section 15 of the NPPF contains several policies targeted at enhancing the natural environment and requires local authorities to consider how impacts on biodiversity can be minimised and provide net gains in biodiversity. Paragraph 187 (a-f) states that:

“Planning policies and decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;*
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;*
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and*
- f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.”*

In addition, paragraph 192 (b) ensures that to protect and enhance biodiversity and geodiversity, plans should:

“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.”

Additional Planning Practice Guidance (PPGs) supports the NPPF and includes guidance on:

-  Agricultural land, soil and brownfield land of environmental value;
-  Green infrastructure;
-  Biodiversity, geodiversity and ecosystems; and
-  Landscape.

Regional/ Local Planning Policy

The Wiltshire Core Strategy Development Plan Document ('the plan') was formally adopted in January 2015. The plan provides a positive and flexible overarching planning policy framework for Wiltshire for the period up to 2026. It contains the relevant planning policies:

-  Core Policy 50 – Biodiversity and Geodiversity
-  Core Policy 52 – Green Infrastructure

UK Post-2010 Biodiversity Framework

The UK Biodiversity Action Plan (UK BAP) was succeeded in 2012 by the 'UK Post-2010 Biodiversity Framework' which demonstrates a whole-environment strategy on how the UK contributes to achieving the Convention on Biological Diversity's (CBD) 20 Aichi Biodiversity Targets. In England, 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services' (Defra, 2011) sets out the strategic direction for biodiversity policy in the future. The former UK BAP was used to draw up lists of species and habitats of 'principal importance' which continue to be regarded as priorities under the Post-2010 Biodiversity Framework and are identified under Section 41 of the NERC Act 2006; these species have been considered throughout this report.

Wiltshire BAP

The latest available Wiltshire Biodiversity Action Plan (BAP) was produced by the Wiltshire Biodiversity Partnership in 2008. The plan includes a Generic Action Plan, ten Habitat Action Plans and a Bat Species Action Plan, which covers all bat species in Wiltshire. The Wiltshire and Swindon Biodiversity Action Plan Steering Group have since published Landscape Biodiversity Areas which provides an additional framework for landscape-scale conservation with which to coordinate conservation efforts in Wiltshire and Swindon. The



Site lies within Area 4: Cotswolds Limestone Lowlands, which highlights woodland, limestone grassland, neutral grassland and rivers as priorities for conservation.

Appendix 3 – Extended UK Habitat Classification Survey

Method

A Site walkover was undertaken on 08 January 2026 By Anna Galvin BSc MSc when weather conditions were dry with varying visibility.

Given the out of season survey, any habitats which were either potentially notable, or on a classification/condition borderline were subject to an update survey. This was undertaken on 19 May 2026 By Ryan Yeates BSc ACIEEM when weather conditions were dry with good visibility.

All habitats within the Site were identified, described and mapped during the field survey in accordance with the UK Habitat Classification (UKHab) (Butcher *et al.*, 2020 (v1.1)/ UKHab Ltd., 2023 (V2.0)) and Statutory Biodiversity Metric (Defra, 2024)/ Biodiversity Metric 4.0 (Natural England, 2023) classifications for hedgerows), with other linear and point features mapped using Phase 1 Habitat Survey symbology (JNCC, 2010).

Primary habitats have been mapped to a minimum mapping unit (MMU) of 25m², although where features of note of a smaller scale are present, these have also been recorded and mapped. Any habitats (e.g. traditional orchard) with no appropriate primary habitat label were assigned a secondary habitat code. Other secondary UKHab codes were recorded where relevant, although they are described qualitatively within this report for ease of reading. A non-exhaustive botanical species list was compiled, with plant names following Stace (2019).

Hedgerow species richness was defined in accordance with the Hedgerow Survey Handbook (Defra, 2007).

A walkover of each grassland parcel was undertaken, followed by detailed sampling using 1m² quadrats, to collect detail on species and sward composition, the number of which was determined by the characteristics of each parcel.

Estimated percentage cover of the below features were assessed based on a qualitative overall assessment of each parcel, along with data collected from quadrats:

- 🍷 Ryegrass and white clover;
- 🍷 Herbs, sedges and rushes;
- 🍷 ‘Undesirable species’ (as defined within Defra, 2024a); and
- 🍷 Bare ground.

Frequency of species was defined using the DAFOR methodology, adapted from that detailed within the Farm Environment Plan (Natural England, 2010):

- 🍷 Dominant: Recorded to cover a majority of the ground in all quadrats and qualitatively assessed as dominating the sward;
- 🍷 Abundant: Recorded in all quadrats, and qualitatively assessed as comprising a significant proportion of the sward;
- 🍷 Frequent: Recorded in >50% of quadrats;
- 🍷 Occasional: Recorded in 20-50% of quadrats; and
- 🍷 Rare: Recorded in <20% of quadrats.

The survey was extended to highlight the potential presence of protected and notable species in accordance with CIEEM’s Guidelines for Preliminary Ecological Appraisal (2017). This involved a search to identify the presence or potential presence of species such as breeding birds, bats, badger, dormouse, reptiles and amphibians. Target Notes (TNs) were used to record any features or habitats of ecological interest. Where access allowed, adjacent habitats were also considered in order to assess possible impacts of the proposal in a wider context.

A digital map was produced using QGIS. The habitat map is shown in **Figure 1**. Common names for flora and fauna are given in the body of the report with scientific names provided in **Appendix 4**.

Results

Desk Study

Table 4 summarises the desk study records for notable plants returned by WSBRC. None of these species were identified during the walkover.

Table 4: Notable Plant Records Provided by WSBRC

Species	Conservation Status	Record Details
Bluebell	Sch8	Three records within Green Lane Woods c. 0.7km northeast.
Round-leaved mint	NS	Single record, 1km northeast from the Site.
Fritillary	NS	Single record, within Biss Meadow Country Park c. 0.3km west from the Site.
Large-leaved lime	NS	Two records, with the closest being 1.6km southeast from the Site.
Stinking hellebore	NS	Single record, c. 1.7km north of the Site.
Welsh poppy	NS	Single record, 2km west of the Site.

Sch8= Plant listed on Schedule 8 of Wildlife & Countryside Act 1981 (as amended). Prohibits picking, uprooting, destruction and sale; **Sch9** = Invasive non-native plant listed on Schedule 9 of Wildlife & Countryside Act 1981 (as amended); **NS** = Nationally Scarce, occurring in 16 – 100 hectads in the UK; **SPI**= Species of Principal Importance under S41 of NERC Act 2006.

Habitat Descriptions

The Site comprised a large other neutral grassland field, with a small area of scrub to the east, areas of introduced shrub and vegetated garden as well as a group of oak trees to the north of the Site. The boundaries are bound by a variety of line of trees, native hedgerows and non-native ornamental hedgerows.

Photographs and brief descriptions are provided below, including a list of dominant vegetative species within each habitat.

Table 4.1: Habitat Summaries

Habitat Summary	Photograph
Other neutral grassland The grassland across the Site had on average 6 species per m², with species such as meadow foxtail, meadow buttercup, and soft brome being present in most quadrats.	

Habitat Summary	Photograph
Modified grassland A small area of modified grassland present along driveway. The grassland had on average 4 species per m², with species such as common daisy and perennial rye grass.	
Mixed scrub A small area of mixed scrub is present along the eastern boundary with species such as bramble and blackthorn present.	
Introduced shrub Areas of ornamental planting area the existing house.	

Habitat Summary	Photograph
Vegetated garden Maintained garden associated with the existing house.	
Individual trees A distinct area of oak trees present to the east of the existing house.	
Line of trees Multiple line of trees present to the south of the Site.	

Habitat Summary	Photograph
Native hedgerow Blackthorn hedgerow present along the northern boundary, bounding the offsite woodland strip.	
Non-native ornamental hedgerow Ornamental hedgerows present to the north of the Site, mainly associated with the existing house/garden area as well as an immature laurel hedgerow along the southern boundary.	

Appendix 4 – List of Flora and Fauna

Plant Species List

Common name	Scientific name (Stace, 2019)
Blackthorn	<i>Prunus spinosa</i>
Bluebell	<i>Hyacinthoides non-scripta</i>
Bramble	<i>Rubus fruticosus</i> agg.
Cock's-foot	<i>Dactylis glomerata</i>
Fritillary	<i>Fritillaria</i> sp.
Large-leaved lime	<i>Tilia platyphyllos</i>
Laurel	<i>Prunus laurocerasus</i>
Meadow buttercup	<i>Ranunculus acris</i>
Meadow foxtail	<i>Alopecurus pratensis</i>
Oak	<i>Quercus</i> sp.
Round-leaved mint	<i>Mentha suaveolens</i>
Soft brome	<i>Bromus hordeaceus</i>
Stinking hellebore	<i>Helleborus foetidus</i>
Welsh poppy	<i>Papaver cambricum</i>

Fauna Mentioned in Text

Common Name	Scientific name	Recorded On Site
Badger	<i>Meles meles</i>	
Barbastelle	<i>Barbastella barbastellus</i>	
Bechstein's bat	<i>Myotis bechsteinii</i>	✓
Brown long-eared bat	<i>Plecotus auritus</i>	
Common frog	<i>Rana temporaria</i>	
Common pipistrelle	<i>Pipistrellus pipistrellus</i>	✓
Common toad	<i>Bufo bufo</i>	
Daubenton's bat	<i>Myotis daubentonii</i>	
Dormouse	<i>Muscardinus avellanarius</i>	
European hedgehog	<i>Erinaceus europaeus</i>	
Grass snake	<i>Natrix helvetica</i>	
Great crested newt	<i>Triturus cristatus</i>	
Greater horseshoe bat	<i>Rhinolophus ferrumequinum</i>	✓
Lesser horseshoe bat	<i>Rhinolophus hipposideros</i>	✓
Long-eared species	<i>Plecotus</i> sp	✓
Natterer's bat	<i>Myotis nattereri</i>	
Noctule	<i>Nyctalus noctula</i>	
Nyctalus species	<i>Nyctalus</i> sp	✓
Otter	<i>Lutra lutra</i>	
Serotine	<i>Eptesicus serotinus</i>	
Slow worm	<i>Anguis fragilis</i>	
Soprano pipistrelle	<i>Pipistrellus pygmaeus</i>	✓
Water Vole	<i>Arvicola amphibius</i>	✓

Appendix 5 – Bat Activity Surveys

Methods

Survey Effort

During the walkover the Site was assessed as having moderate suitability for bats in accordance with best practice guidance (Collins, 2023), based on the presence of continuous, high-quality habitat that is well-connected to the surrounding habitat and known roosts which is likely to be used regularly by bats.

Considering the predicted impacts of the proposed development on bats it was therefore proportionate to undertake automated detector surveys at least once a month between April and October 2026, in accordance with Trowbridge and Westbury Bat Mitigation Strategy (TWMBs, 2025).

Night-time Bat Walkover Surveys

Night-time bat walkover (NBW) surveys comprised two experienced surveyors observing and recording bat behaviour on Site. Surveys commenced 15 minutes before sunset, with surveyors positioned on potential flyways, or close to potential roost features, previously identified as part of the walkover survey. Starting locations were altered between surveys to assess the importance of different features to bats. Surveyors initially remained in place to record early emerging behaviour and commuting bats - tracking the bat movement towards a roost, if appropriate. After 30 minutes to an hour from sunset, surveyors then walked a pre-defined transect route (no more than 3km) covering all suitable foraging and commuting habitats within the Site. During the walked survey surveyors responded dynamically to bat activity on Site, occasionally stopping or detouring to observe bat behaviour. The survey concluded two hours after sunset/when it became too dark to see bat activity.

Surveyors were equipped with a manual hand-held detector and recorder (Elekon Batlogger). When a bat was encountered the time, species and flight behaviour, direction and height was noted.

Surveys were completed during optimal weather conditions, as detailed in **Table 6**. Exceptions are discussed further in the limitations where appropriate (**Section 2.5**).

Table 6: Bat Activity Transect Survey Dates and Personnel

Date	Sunset/ start time	End time	Transect length (time)	Weather	Personnel
30/04/2026	20:14	22:29	2 hours 15 mins	Dry, 17 – 11°C, 5-0% cloud cover (cc), wind (Beaufort) 0 – 1.	CH, RH
26/05/2026	20:54	23:09	2 hours 15 mins	Dry, 19-24°C, 0-15% cloud cover (cc), wind (Beaufort) 0	AR, SP

CH = Cameron Hard BSc; RH = Ryan Hobbs BSc; AR= Asher Rees BSc; SP= Sally Pheasant BSc

Automated Detector Surveys

Night-time bat walkover surveys were supplemented with the use of static automated detectors to increase survey effort.

This involved the deployment of four static detectors (Wildlife Acoustics Song Meter SM2/Song Meter Mini), in hedgerows. Locations were chosen through a “judgmental” strategy, considering features of greatest interest and those most likely to be impacted by proposals. Detectors were positioned on the leeward side of hedges and habitats, facing into the field, to avoid noise from wind and vegetation. Statics will be deployed for a minimum of five nights per month between April and October 2026, on the following dates:

 30 April – 5 May 2026

30 July 2026

- 🦇 26 May – 3 June 2026
- 🦇 25 – 30 June 2026
- 🦇 14 – 18 July 2026
- 🦇 13 August – 17 August 2026
- 🦇 7 September – 11 September 2026
- 🦇 6 October – 10 October 2026

Bat Data Analysis

Recordings from NBW surveys were analysed through Wildlife Acoustics Kaleidoscope Pro software and processed through Microsoft Excel, R Statistical Software (R Core Team, 2021) and QGIS to produce a point map showing locations at which bat passes were recorded. The map was annotated to provide qualitative information about bat use of the Site, including key foraging areas and commuting routes.

The latest version of Wildlife Acoustics Kaleidoscope Pro software was used for processing and analysing static bat data. The confidence settings used were “liberal (this will produce more identifications but have more false positives)” with an audit of all recordings, including “noise” files. Batches of noise files and pipistrelle calls were checked depending upon their characteristics which are grouped by a range of variables including background noise and strength of calls. *Myotis*, long-eared (*Plecotus*) and *Nyctalus* species were identified to genus level. All bat calls other than common, soprano pipistrelle and *Nyctalus* species were verified manually in full, with at least 10% of calls checked again to confirm verification. A three-stage quality assurance process was undertaken, focusing on cryptic species. Where necessary further identification of more cryptic species such as *Myotis* and long-eared bats was undertaken using Titley Scientific Analook software.

Data from the automated surveys was then analysed and presented, using R Statistical Software (R Core Team, 2021). A bat pass is defined as a sequence of echolocation calls separated from another call by a minimum of 2 seconds. The number of bat passes per hour for each species was calculated (bat pass/night length), allowing comparison between different seasons and locations on Site. The time of calls relative to sunset/sunrise was also calculated, using the ‘bioRad’ R package, and considered in relation to expected emergence times for each species (Andrews and Pearson, 2022).

QGIS was used to produce a map showing static locations and Euler graphs of bat activity showing the passes per hour for all bat species, all bat species excluding pipistrelles, light averse species and Annex II species. Light averse species are defined as showing no positive or negligible effect from artificial light at night as shown in Table 1 of Bats and Artificial Lighting at Night Guidance Note 08/23 (BCT & ILP, 2023).

Results

608 records of bat roosts were provided by WSBRC from the last ten years within 2km of the Site, a summary of the species and their legal/ conservation status is provided in **Table 7.1** below.

Table 7.1: Summary of Bat Roost Records within 2km of Site (provided by WSBRC)

Species	Status/ Distribution in South-west England & South Wales ²	Record Summary
Common pipistrelle	EPS. Widely distributed.	37 records with the closest being 0.9km southeast from the Site.
Soprano pipistrelle	EPS, SPI. Widely distributed.	46 records with the closest being 0.3km south of the Site.

² Status/distribution according to the UK Bat Mitigation Guidelines (Reason and Wray, 2025).

Species	Status/ Distribution in South-west England & South Wales ²	Record Summary
Brown long-eared bat and long eared species.	EPS, SPI. Widely distributed.	93 records, with the closest being 0.4km south of the Site. 14 of these records are associated with maternity roosts, the closest being located 0.4km south of the Site. 1 of these records is associated with a hibernation roost, located c.0.8km southwest of the Site.
Natterer's bat	EPS. Widespread in many geographies, but not abundant in all.	52 records, the closest being 0.3km south of the Site.
Daubenton's bat	EPS. Widespread in many geographies, but not abundant in all.	2 records, the closest being 0.9km southeast from the Site.
Bechstein's bat	EPS, Annex II, SPI. Very rare.	283 records, the closest being 0.7km northeast from the Site. This includes a maternity roost at the same location.
Noctule bat	EPS, SPI. Widespread in many geographies, but not abundant in all.	20 records, the closest being 0.4km south of the Site. This includes a maternity roost located 0.9km southeast of the Site.
Greater horseshoe bat	EPS, Annex II, SPI. Very rare.	13 records, with the closest being 0.9km southeast from the Site. 1 of these records is of a maternity roost located 0.9km southeast from the Site.
Lesser horseshoe bat	EPS, Annex II, SPI. Rare, with a restricted distribution.	56 records with the closest being 0.9km southeast from the Site. 18 of which are associated with maternity roosts with the closest located 0.9km southeast of the Site. 2 of which are associated with hibernation roosts with the closest being 0.9km southeast of the Site.
Western barbastelle	EPS, Annex II, SPI. Very rare.	6 records, the closest being 0.9km southeast from the Site.

EPS = European Protected Species; **Annex II** = species listed in the Habitat Directives Annex II; **SPI** = Species of Principal Importance under S41 of NERC Act 2006.

MAGIC provided 6 records of roosting bats as shown in the table below.

Table 7.2: Bat Mitigation Licences Granted within 2km of the Site (MAGIC)

Licence No.	Species	Impact/ Roost Type	Dates of Licence	Distance from Site
2020-48340-EPS-MIT	Common pipistrelle (EPS)	Destruction of resting place	02/10/2020-28/02/2025	0.6km northwest

Licence No.	Species	Impact/ Roost Type	Dates of Licence	Distance from Site
2015-11070- EPS-MIT	Common pipistrelle	Destruction of resting place	06/08/2015 - 31/08/2020	0.6km northwest
2015-11070- EPS-MIT-1	Common pipistrelle	Destruction of resting place	16/12/2015 - 31/08/2020	0.6km northwest
2015-15090- EPS-MIT	Common pipistrelle and lesser horseshoe (EPS, SPI, Annex II)	Destruction of resting place	04/09/2015 - 31/12/2025	1km west.
EPSM2012-5169	Common pipistrelle	Destruction of resting place	23/11/2012 - 31/08/2015	1.8km northeast
2014-5466-EPS- MIT	Brown long-eared bat (EPS, SPI)	Destruction of resting place	10/03/2015 - 08/03/2020	1.3km southwest

Night-time Bat Walkover Survey Results

Table 7.3: Summary of Total Bat Passes Recorded during NBW Surveys

Survey Month	PIPIPI	PIPPYG	MYOSPP	CNESER	PIP NAT	RHIHIP	BARBAR	Grand Total
April	116	43	9	2	0	0	0	170
May	25	36	2	9	0	2	1	75
June	188	13	1	0	1	1	0	204
Total	329	92	12	11	1	1	1	449

PIPIPI = common pipistrelle; PIPPYG = soprano pipistrelle; CNESER = Serotine; MYOSPP = *Myotis* species; PIP NAT = Nathusius' pipistrelle; RHIHIP = lesser horseshoe; BARBAR = barbastelle

Across all NBW surveys, common pipistrelle was the most frequently recorded species, followed by soprano pipistrelle and *Myotis* species (Table 7.3).

Bat activity was focused on the southeastern boundary corner, the northern boundary and adjacent to the individual trees and existing house to the northwest of the Site (see Figure 3). Pipistrelle activity was focused on the previously described areas with a small number of these passes being around 30 minutes after sunset, indicating a roost may be nearby.

Myotis calls were more sporadic across the southern and norther boundary in low densities. A couple of serotine calls were registered along the northern boundary.

Automated Detector Survey

During the automated detector surveys, statics were placed at the following locations (illustrated in Figure 4):

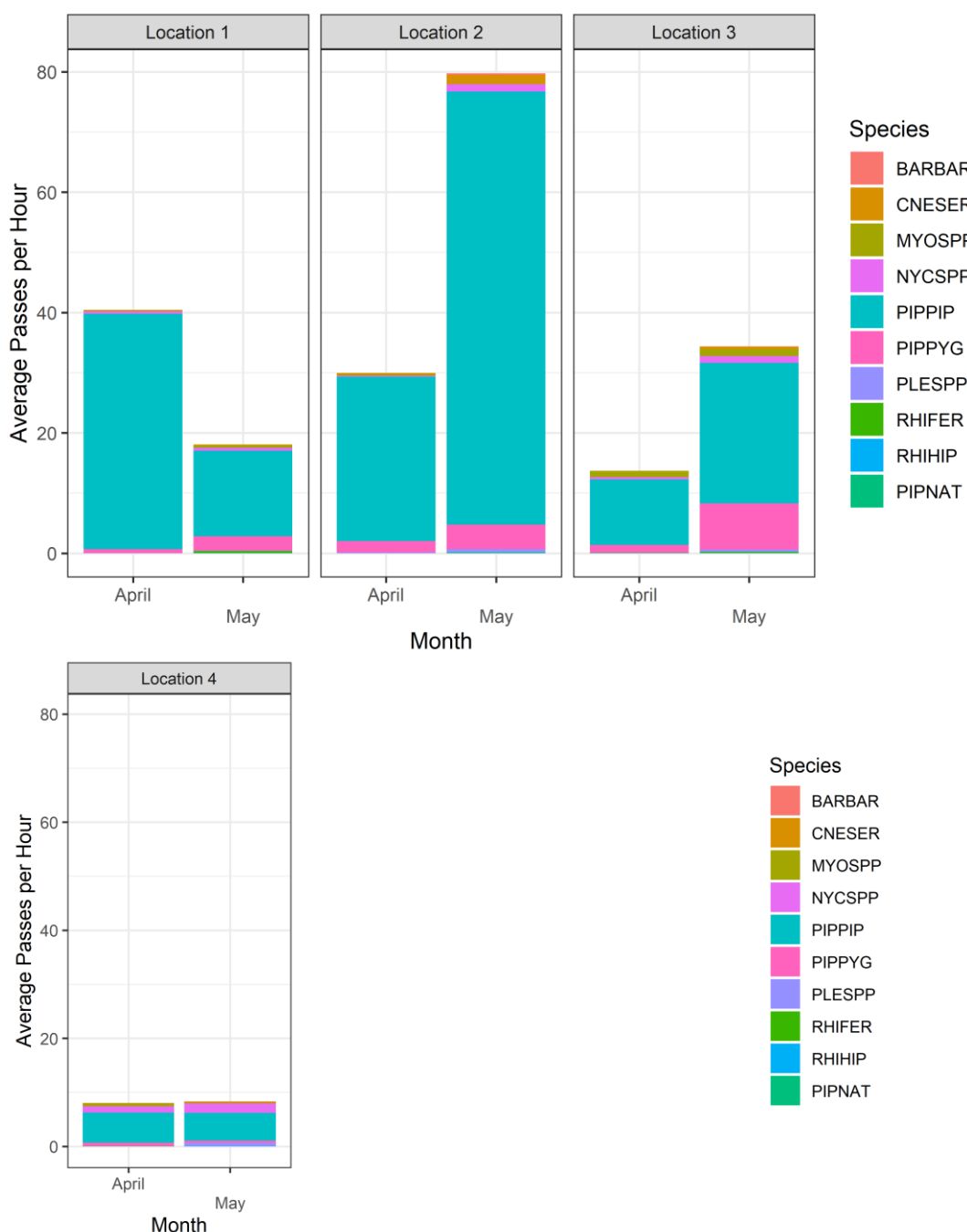
- 📍 Location 1 – western boundary;
- 📍 Location 2 – within group of trees;
- 📍 Location 3 – southern boundary treeline along watercourse; and
- 📍 Location 4 – northeastern hedgerow.

Graph 1 below illustrates the relative abundance of bat activity recorded during the survey period. Location 1 supported the highest number of bats passes per hour overall.

Common pipistrelle was the most frequently recorded bat species (84.87% of recorded bat passes; 98.72 passes per hour), followed by soprano pipistrelle (8.15%; 9.47 passes/hour). Both common and soprano pipistrelles showed greatest affinity to Location 2.

Nyctalus activity was also frequently recorded (2.92%; 3.39 passes/hour) with highest levels of activity at Location 4. However, it should be noted that due to the strength of noctule calls, this species can be detected from >100m and they also commute and forage over open habitat; therefore, it indicates that bats are using this general area of the Site, not necessarily the hedgerow itself.

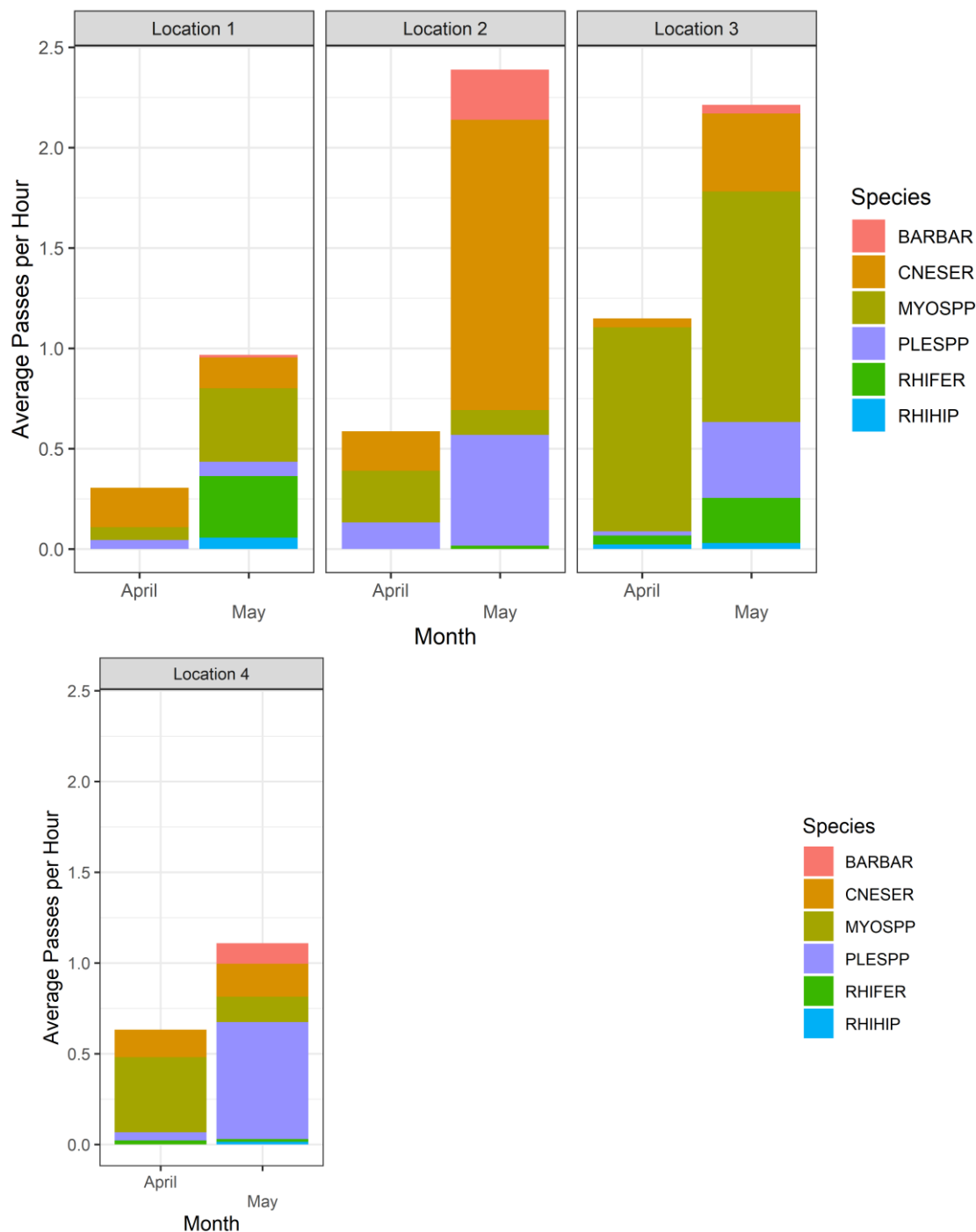
Graph 1: Average Bat Passes per Hour During the Automated Detector Survey Period



PIPPIP = common pipistrelle; **PIPPYG** = soprano pipistrelle; **PIPAT** = Nathusius' pipistrelle; **NYCSPP** = *Nyctalus* species; **CNESER** = Serotine; **MYOSPP** = *Myotis* species; **RHIHIP** = lesser horseshoe bat.; **RHIFER** = greater horseshoe bat.; **BARBAR** = barbastelle; **PLESPP** = Long-eared bat species.

Graph 2 below excludes pipistrelles and noctules for a clearer picture of activity for other species³. Serotine were recorded occasionally on Site, at all four locations (0.64%; 0.58 passes/hour; Moderate). *Myotis* species (1.90%; 1.74 passes/hour; Moderate), which are considered to be more light averse, were recorded at all locations, but with highest levels of activity recorded at Location 3. Similarly, long-eared bats were recorded at each location (0.26%; 0.24 passes/hour; Moderate). Most recordings were at Location 2, nearest to the group of trees.

Graph 2: Average Bat Passes per Hour during the Automated Detector Survey Period, excluding Pipistrelles and *Nyctalus* sp.

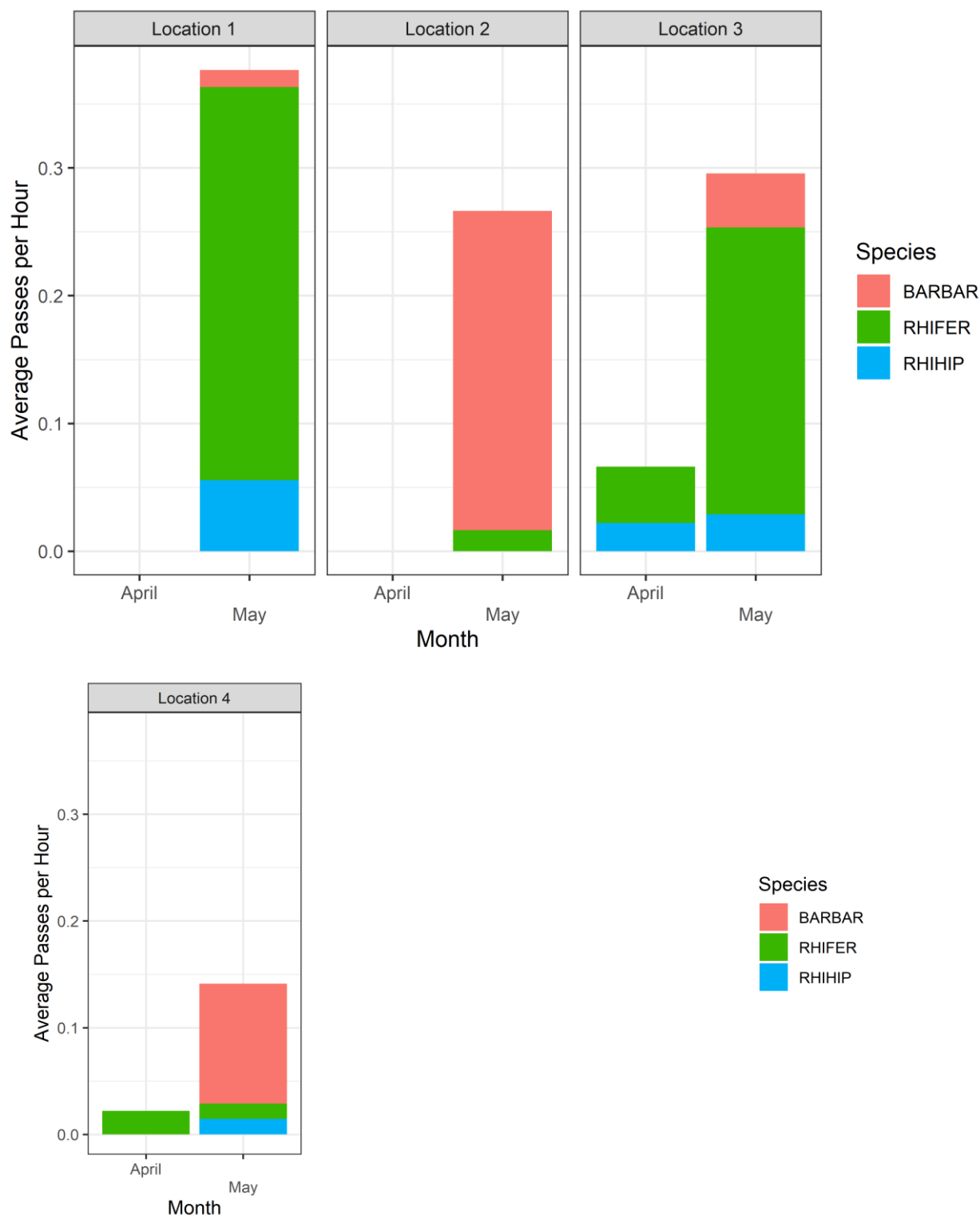


CNESER = serotine; **MYOSPP** = *Myotis* species; **PLESPP** = long-eared bat species.; **RHIHIP** = lesser horseshoe bat; **RHIFER** = greater horseshoe bat.; **BARBAR**= barbastelle

³ Pipistrelles are excluded due to the abundance of calls recorded, and noctule are excluded as they have strong calls that can be detected from >100m away and therefore do not specifically reflect levels of bat activity at the specific location of the detector.

Graph 3 illustrates the abundance of activity by Annex II species only. Low levels of activity by greater horseshoe and lesser horseshoe bats were recorded on Site. Greater horseshoe (0.07%; 0.06 passes/hour; Moderate) and lesser horseshoe (0.02%; 0.02 passes/hour; Moderate). Greater horseshoe passes were only recorded at Location 3 and Location 4, whereas lesser horseshoe was only recorded at Location 3. Location 3 and 4 are both further into the Site, well away from lighting compared to Location 1.

Graph 3: Average Bat Passes per Hour during the Automated Detector Survey Period, for Annex II species

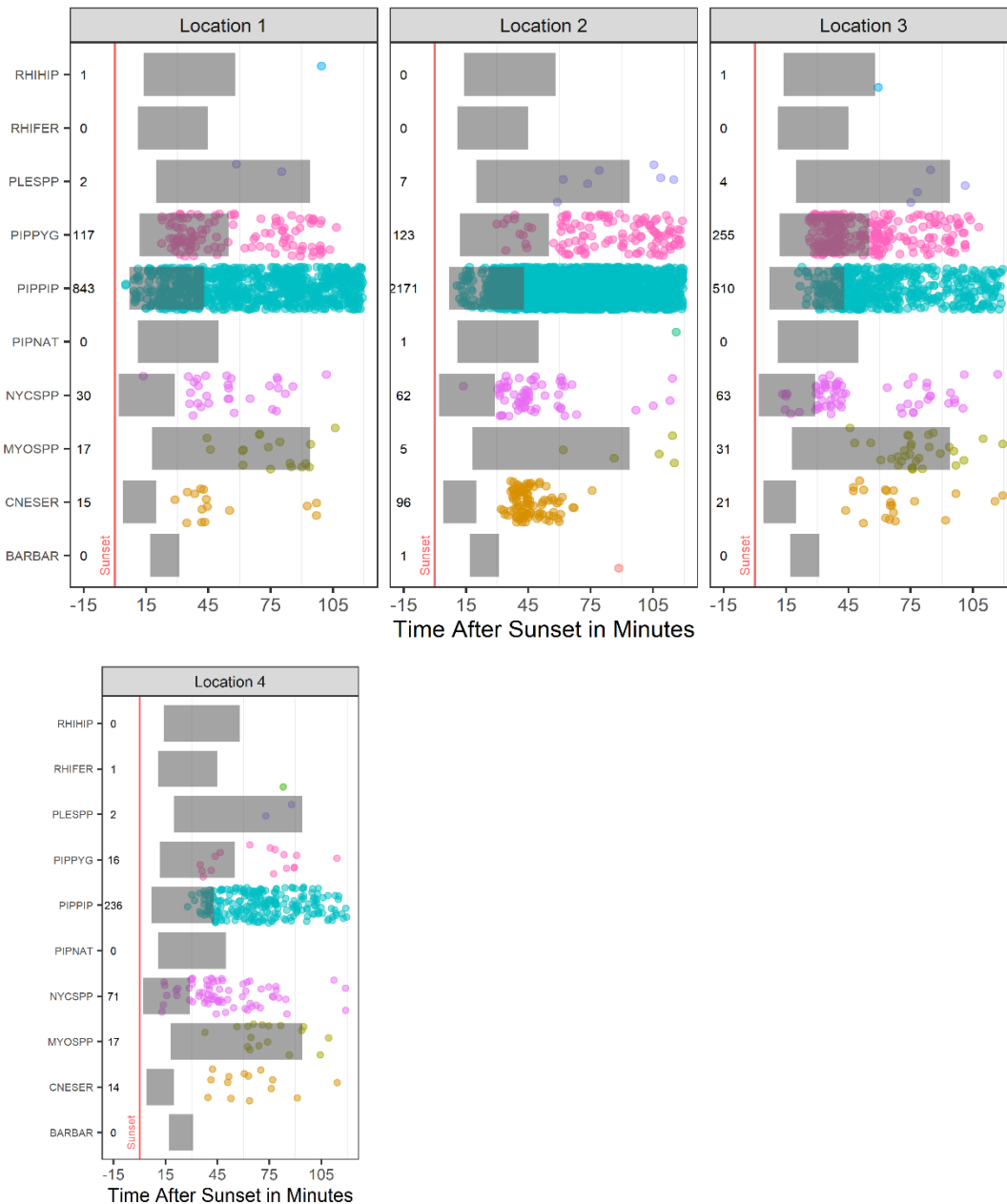


RHIHIP = lesser horseshoe.; **RHIFER** = greater horseshoe; **BARBAR**= barbastelle

Graph 4 shows passes of species in relation to expected emergence times from Andrews and Pearson (2022), included on pp.34-35 in the BCT survey guidelines (Collins, 2023). The graph shows that common pipistrelle, soprano pipistrelle, *Myotis* species, long-eared species and *Nyctalus* species were recorded on Site during their expected emergence periods and therefore may be emerging from a roost nearby and/or on Site and commuting through the Site. These species are highly likely to be using the Site for foraging close to their roosting site/commuting through the Site before heading further afield.

The high number of common pipistrelle passes at emergence time indicates that there may be a roost in the vicinity and the Site is therefore of high importance as a commuting route for these bats.

Graph 4: All bat passes in relation to emergence periods for each species



RHIHIP = lesser horseshoe bat.; **RHIFER** = greater horseshoe bat; **PLESPP** = Long-eared bat species; **PIPPYG** = soprano pipistrelle; **PIPPIP** = common pipistrelle; **PIP NAT** = Nathusius' pipistrelle; **NYCSPP** = *Nyctalus* species; **CNESER** = Serotine; **MYOSPP** = *Myotis* species; **BARBAR** = barbastelle.



Although overall highest bat activity was recorded on the western boundary adjacent to the wooded area near a residential house (Location 2), the majority of passes were from widespread species common pipistrelle, soprano pipistrelle and noctule, all of which are relatively accustomed to lighting. Common pipistrelle passes were very high at Location 1 and 2, indicating that a roost is on Site or within the near vicinity. The southern boundary parallel to the watercourse recorded the highest number of light-averse species such as horseshoe bats and long-eared bats, with the highest number of *Myotis* species passes also recorded in the same area.

Appendix 6 – Dormouse Survey

Methods

A dormouse tube survey was undertaken in accordance with the Hazel Dormouse Mitigation Handbook (Wells et al, 2025) 50 tubes were deployed on 14 May 2026 by Sam Cooper BSc as an accredited agent under Meike Simm's Class 1 Dormouse Licence (ref: 2025-85358-SCI-CL10) at approximately 20m intervals (see **Figure 5** for locations). Tubes will be checked on 29 July and 30 September 2026 by an accredited or licenced surveyor.

Results

No dormouse tube checks have been completed at the time of writing this report and therefore the presence/absence of dormice from the Site cannot be determined. This will be updated following the scheduled checks.

Appendix 7 – Great Crested Newt Survey

Methods

Pond Scoping

A review of OS maps and aerial imagery identified three waterbodies within 250m of the Site boundary as shown in **Figure 6**.

It is considered surveys beyond 250m from the Site boundary are not necessary as the Site does not meet the criteria detailed by Natural England within the EPS Licence Method Statement, namely;

- 🦎 Maps, aerial photos, walkover surveys or other data do not indicate that the pond(s) has/have potential to support a large great crested newt population;
- 🦎 The footprint of the development does not contain particularly favourable habitat, which further does not constitute the majority of potentially available habitat locally; and
- 🦎 The development would not have a substantial negative effect on that habitat.

Habitat Suitability Index

An assessment of each waterbody's suitability to support a breeding population of great crested newts (GCN) was made according to the criteria of the Habitat Suitability Index (HSI) (Oldham *et al.*, 2000) following the methodology described in the ARG UK Guidance Note 5 (ARG UK, 2010). The scores translate into a breeding suitability as shown in **Table 8**.

Table 8: Scoring System for GCN Breeding Suitability using HSI

HSI Score	Suitability for breeding GCN
<0.5	Poor
0.5 – 0.59	Below average
0.6 – 0.69	Average
0.7 – 0.79	Good
> 0.8	Excellent

Environmental DNA (eDNA) Survey

Ponds identified as suitable for water collection during the HSI assessment were sampled for eDNA. This method involved taking water samples from each water body within Natural England's accepted sampling period of 15 April to 30 June following the methodology described in the Defra Report WC1067 (Biggs *et al.*, 2014a) and the subsequent Technical Advice Note (Biggs *et al.*, 2014b).

Twenty 30ml water samples were taken from each pond on 05 May 2026 by Lindsay Taylor BSc MSc MCIEEM Great Crested Newt Class 1 Licence holder (ref: 2025-82961-SCI-CL08) and Meike Simms BSc ACIEEM using sterile field equipment supplied by SureScreen Scientifics. Sample locations were selected based on accessibility and suitable GCN egg laying and displaying areas, with as much of the margin being sampled as possible. The surveyor wore sterile gloves whilst taking the sample and did not enter the water. The water column was mixed gently before taking the sample, with care taken not to disturb the sediment at the bottom of the pond. The samples from each pond were mixed and 15ml added to six sterile tubes containing 35ml ethanol.

Samples were stored overnight in a refrigerator and then sent to SureScreen Scientifics for analysis. The methodology for laboratory analysis can be provided by SureScreen Scientifics on request.

Results

HSI/ eDNA Results

Table 9 summarises the HSI and eDNA scores for each pond. eDNA analysis confirmed the absence of great crested newts from Pond 1 and Pond 3. Pond 2 was dry at time of survey. Pond locations are shown on **Figure 6**.

Table 9: Great Crested Newt HSI and eDNA Results

POND 1		
Suitability Indices	Score	Photograph
SI ₁ . Location	1.00	
SI ₂ . Pond Area (to nearest 50m ²)	1.00	
SI ₃ . Pond Drying	0.10	
SI ₄ . Water Quality	0.33	
SI ₅ . Shoreline Shade (%)	0.20	
SI ₆ . Waterfowl	0.67	
SI ₇ . Fish	1.00	
SI ₈ . Pond Count (within 1km)	0.65	
SI ₉ . Terrestrial habitat	1.00	
SI ₁₀ . Macrophyte cover (%)	0.31	
HSI SCORE	0.4954	
POND SUITABILITY	Poor	
eDNA Result	Negative	

POND 2		
Suitability Indices	Score	Photograph
SI ₁ . Location	1.00	
SI ₂ . Pond Area (to nearest 50m ²)	0.82	
SI ₃ . Pond Drying	0.10	
SI ₄ . Water Quality	0.33	
SI ₅ . Shoreline Shade (%)	1.00	
SI ₆ . Waterfowl	0.01	
SI ₇ . Fish	1.00	
SI ₈ . Pond Count (within 1km)	0.65	
SI ₉ . Terrestrial habitat	1.00	
SI ₁₀ . Macrophyte cover (%)	0.90	
HSI SCORE	0.4166	
POND SUITABILITY	Poor	
eDNA Result	Negative	

POND 3		
Suitability Indices	Score	Photograph
SI ₁ . Location	1.00	
SI ₂ . Pond Area (to nearest 50m ²)	0.90	
SI ₃ . Pond Drying	0.50	
SI ₄ . Water Quality	1.00	
SI ₅ . Shoreline Shade (%)	1.00	
SI ₆ . Waterfowl	0.01	
SI ₇ . Fish	0.67	
SI ₈ . Pond Count (within 1km)	0.72	
SI ₉ . Terrestrial habitat	0.67	
SI ₁₀ . Macrophyte cover (%)	0.60	
HSI SCORE	0.4944	
POND SUITABILITY	Poor	
eDNA Result	Negative	

Appendix 8 – Tree Assessment for Bats

Methods

Ground Level Tree Assessment (GLTA)

The trees on Site were subject to a Ground Level Tree Assessment (GLTA) by Anna Galvin BSc MSc Bats Class 1 Licence holder (ref: 2025-81464-SCI-CL17) during the initial walkover survey for their bat roost potential in accordance with best practice methodology published by the Bat Conservation Trust (Collins, 2023).

Trees were inspected from ground-level with the aid of binoculars and a high-powered torch for Potential Roost Features (PRFs) such as rot holes, hazard beams, cracks or splits, woodpecker holes, knot holes, man-made holes, cankers, gaps between overlapping stems/branches, loose bark, dense ivy, epicormic growth and bat, bird or dormouse boxes. Signs indicating possible use by bats were also recorded such as bat droppings, odour, scratches, staining and audible sounds. Information collected about PRFs included a description, the height of the feature above ground level and the orientation of the feature in relation to the trunk.

Trees were then prescribed a category based on their potential to support roosting bats as detailed in **Table 10.1**. Locations are shown in **Figure 7**.

Table 10.1: Assessment of Tree Bat Roost Potential from Ground Level (adapted Collins, 2023)

Suitability	Description of bat roosting potential
None	Either no PRFs in the tree or highly unlikely to be any
FAR	Further assessment required (FAR) to establish if PRFs are present in the tree.
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. Estimate only during GLTA.
PRF-M	PRF is suitable for multiple bats and may therefore be used by a maternity colony. Estimate only during GLTA.

Results

Two trees were identified as having bat roost potential as detailed in **Table 10.2**. Tree locations and their categories are shown on **Figure 7**.



Table 10.2: Summary of Tree Assessment Results

Tree ref.	Species	Potential Roost Features (PRF)	Tree category (Collins, 2023)	Photograph
T10	Oak sp. <i>Quercus</i> <i>sp.</i>	Woodpecker hole c. 6m high facing north.	PRF-M	 A photograph of a large, mature oak tree with a thick, textured trunk and bare branches against a cloudy sky.
T15	Oak sp. <i>Quercus</i> <i>sp.</i>	Woodpecker hole c. 4m high facing north.	PRF-M	 A photograph of a large, mature oak tree with a thick, textured trunk and bare branches, viewed from a lower angle than T10, showing a green field and a wooden fence in the foreground.

Appendix 9 – Riparian Mammal Survey

Methods

A riparian mammal survey was undertaken on 05 May 2026 by Lindsay Taylor BSc MSc MCIEEM and Meike Simms BSc ACIEEM with the second survey scheduled to be conducted on 07 September 2026. The survey involved a walkover of the watercourse and a survey of both riverbanks where accessible for a length of approximately 500m up- and downstream of the Site.

Physical characteristics of the watercourse were recorded such as aspect, slope and substrate, along with any evidence of recent and ongoing management. A detailed search was made along the river following current best practice methodologies (NatureScot, 2024 (beaver), National Rivers Authority, 2001, Highways Agency, 1999 (otter) and Dean *et al.*, 2016 (water vole)) for evidence of:

- 🦫 Beaver, including dams, burrows, lodges, feeding signs, food caches and slides;
- 🦫 Otter, including footprints, spraints, holts, runs, slides and feeding remains;
- 🦫 Water vole, including burrows, droppings, footprints and feeding remains; and,
- 🦫 American mink, including footprints and droppings.

The survey included each riverbank, emergent fringe vegetation and overhanging trees/ exposed tree roots close to the water surface. During the survey, the main habitat type of each section of bank was recorded, and the locations of any evidence marked on a map.

Results

Habitat Description

The watercourse comprised a shallow flowing stream with well vegetated banks and some aquatic vegetation. The substrate was dominated by silt with some brash that has been swept downstream.

Summary of Results

Evidence of water vole was found at the western extent of the southern boundary watercourse with latrines, feeding remains and burrows recorded, whilst no evidence for this species was recorded elsewhere on site.

As such it is considered that water vole make use of the western extent of this watercourse.

Appendix 10 – Preliminary Roost Assessment (Bats)

Methods

A detailed Preliminary Roost Assessment (PRA) for bats was undertaken on 05 May 2026 by Lindsay Taylor BSc MSc MCIEEM Natural England Level 1 licence holder ref: 2025-82961-SCI-CL08 and Meike Simms BSc ACIEEM in accordance with current best practice methodology (Collins, 2023).

This involved an external inspection using close focusing binoculars, high-powered torches, extendable ladder and endoscope where appropriate. An internal inspection has not been carried out due to access arrangements and will be conducted at a later date. A search was made for features which could provide suitable roosting spaces for bats, including gaps beneath tiles and flashing and possible access under soffits. A systematic search will be made of all accessible loft spaces for the presence of bats and evidence such as bat droppings.

The buildings were then prescribed a category based on their potential to support roosting bats as detailed in **Table 12**. A building location plan is provided in **Figure 9**. If evidence of a bat roost was identified during the PRA, this was noted as a 'confirmed roost'.

Table 12: Bat Roost Potential (adapted from Collins, 2023)

Potential Suitability	Description of bat roosting potential
None	No habitat features likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels.
Negligible	No obvious habitat features likely to be used by roosting bats; however a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable habitat to be used on a regular basis or by a larger number of bats (i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site but could be used by individual hibernating bats).
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status e.g. a maternity or hibernation roost.
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/stable hibernation site.

DNA Analysis

If bat droppings are found during the internal inspect then they will be collected following the BCT bat dropping collection protocol (Collins, 2023).

Results

There are five buildings (B1-B5) within the Site boundary. The buildings are located to the northwest of the Site adjacent to the northern boundary which provides connectivity from the buildings to the habitats on Site and the surrounding area. There is limited connectivity to the north due to the urban land use.

The buildings on Site are described in **Table 13**, along with an assessment of the suitability of the buildings to support roosting bats and a description of any bat evidence found.

In summary, Building 1, 2 and 3 have been categorised as having **at least** low potential to support roosting bats, a final categorisation will be assigned once the internal inspection has been conducted. B4 and B5 were categorised as having negligible potential to support roosting bats.

Table 13: Preliminary Roost Assessment Results

Building number	Description	Bat evidence/ access points/ potential features	Photograph	Category (based on Collins, 2023)
B1	Exterior - brick built house with roman clay tiles. Hip and valley roof structure. Plastic soffits and fascia present. Lead flashing present. Interior - TBC	Lifted tiles above window. Soffits have vent holes present, with some with missing caps. Gap on eastern elevation at lead flashing.		At least Low, final category to be assigned after internal inspection.
B2	Exterior – brick built garage with single hip roof with roman clay tiles. Plastic soffits and fascia present. Ridge tiles present. Interior - TBC	Possible gap at wall top.		At least Low, final category to be assigned after internal inspection.

Building number	Description	Bat evidence/ access points/ potential features	Photograph	Category (based on Collins, 2023)
B3	Wooden shed with Perspex and slate tiled roof. Interior - TBC	Gaps beneath Perspex roofing sheet. No evidence found.		At least Low, final category to be assigned after internal inspection.
B4	Wooden pagoda with hipped roof and slate tiles. Open on three sides. Wooden rafter and battens present. No lining or insulation.	No evidence found.		Negligible.
B5	Wooden summerhouse with hipped roof and slate tiles. Floor to ceilings windows on all aspects.	No evidence found.		Negligible.

