

FPCR | environment
& design



Ecological Impact Assessment

Client

Bellway Homes Limited

Project

**Land at Townsend Farm,
Melksham**

Date

July 2026

CONTENTS

1.0	NON-TECHNICAL SUMMARY	2
2.0	INTRODUCTION	4
3.0	LEGISLATION AND POLICY	6
4.0	METHODOLOGY	7
5.0	RESULTS	10
6.0	DISCUSSION	17
7.0	CONCLUSION	24

FIGURES

Figure 1: Site Location and Consultation Results Plan – Designated Sites

Figure 2a: Site Location and Consultation Results Plan – Species Records

Figure 2b: Site Location and Consultation Results Plan: Bird Species Records

Figure 3: Baseline Habitats

Figure 4: Baseline Habitat Condition and Distinctiveness

Figure F1: Badger Survey Results Plan

Figure G1: Building Location Plan

Figure G2: Bat Emergence Survey Reference Plan

Figure G3: Bats in Trees Plan

Figure G4: Static Bat Detector Location Plan

Figure G5a: Bat Flightlines Plan – April

Figure G5b: Bat Transect Plan – April

Figure G6a: Bat Flightlines Plan – May

Figure G6b: Bat Transect Plan – May

Figure G7a: Bat Flightlines Plan – July

Figure G7b: Bat Transect Plan – July

Figure H1: Breeding Bird Survey Results Plan

Figure I1: Reptile Refugia Location Plan

Figure J1: Dormouse Tube Location Plan

Figure K01: Proposed Habitats

Figure K02: Habitat Retention

Figure K03: Proposed Habitat Condition and Distinctiveness

APPENDICES

Appendix A: Relevant Policy and Legislation

Appendix B: Survey Personnel

Appendix C: Botanical Species List

Appendix D: Site Photographs

Appendix E: Protected and Notable Species List

Appendix F: Badger Survey Report

Appendix G: Bat Survey Report

Appendix H: Breeding Bird Survey Report

Appendix I: Reptile Survey Report

Appendix J: Dormouse Survey Report

Appendix K: Biodiversity Net Gain Report

Rev	Issue Status	Prepared/Date	Approved/Date
-	Draft	JS / SB 29.07.26	APD / 29.07.26

1.0 NON-TECHNICAL SUMMARY

Report Scope and Methodology

FPCR were commissioned by Bellway Homes Limited to undertake an Ecological Impact Assessment (EclA) on land located at Townsend Farm, Melksham, Wiltshire to provide an ecological baseline for the site and determine its ecological importance and constraints.

The proposal is for the outline application for up to 225 dwellings, with access from Semington Road, along with public open space and landscape buffers to incorporate existing rights of way and to accommodate the route of the proposed Melksham Link Canal (under separate application W/12/01080/FUL). Demolition and clearance of all existing buildings and structures on the site. All matters reserved other than vehicular access from Semington Road.

The assessment is based on a desktop review of existing ecological records and designated sites, a UKHab habitat survey, and a suite of protected species surveys including badger, bats, breeding birds, reptiles and hazel dormouse. The assessment has been undertaken in accordance with the Chartered Institute of Ecology and Environmental Management (CIEEM) Ecological Impact Assessment Guidelines and follows the mitigation hierarchy of avoidance, mitigation, compensation and enhancement.

Ecological Baseline

The Site comprises 11ha of predominantly improved agricultural grassland associated with an active farm, together with hedgerows, scattered mature trees, scrub, former agricultural buildings and small areas of disturbed ground. Most habitats are of relatively low intrinsic ecological value; however, the boundary hedgerows, mature trees and associated habitat corridors provide important connectivity within the wider landscape.

The Site supports a range of protected and notable species, including badgers, bats and breeding birds, while suitable habitat is present for hazel dormouse. Reptile surveys to date have not recorded any reptiles, although habitat along field margins and around farm buildings may support widespread reptile species. Great crested newts were scoped out due to the absence of suitable breeding ponds nearby. The Site is not subject to any statutory ecological designations, although the Bath and Bradford on Avon Bats Special Area of Conservation (SAC) lies approximately 8.5km away, and two Local Wildlife Sites occur within the surrounding area. Overall, the majority of ecological features are considered to be of Local ecological importance.

Assessment of Impacts

The proposed development will result in the loss of areas of species-poor grassland, sections of internal hedgerow and several existing buildings, including one building confirmed to support a lesser horseshoe bat roost. Construction activities also have the potential to disturb protected species, including badgers and bats, if appropriate safeguards are not implemented.

The masterplan has been informed by ecological constraints from the outset, retaining the majority of boundary hedgerows, mature trees and key habitat corridors, together with substantial areas of green infrastructure. Subject to the implementation of the recommended mitigation measures, no significant adverse residual effects are predicted on designated sites, habitats or protected species. The proposals will provide improved habitat connectivity and greater habitat diversity than currently exists through the creation of species-rich grassland, scrub, woodland planting and wetland features associated with the sustainable drainage system.

Recommended Mitigation, Compensation and Enhancement

Report Scope and Methodology

A range of embedded and additional mitigation measures will ensure compliance with wildlife legislation and minimise impacts during construction and operation. These include the retention and protection of important hedgerows and trees, ecological buffers, sensitive lighting design, precautionary working methods for protected species, protection of retained habitats during construction, and licensing where required for works affecting bat roosts or badger setts.

Long-term habitat creation and management will be secured through a Construction Environmental Management Plan, Habitat Management and Monitoring Plan, and Landscape and Ecological Enhancement Plan. Measures will include native tree and hedgerow planting, species-rich grassland creation, wetland habitats associated with SuDS, bat and bird boxes, integrated bat roost features within new buildings, reptile refuge features and hedgehog highways. Together with the proposed green infrastructure network, these measures will deliver measurable biodiversity enhancements and are expected to achieve Biodiversity Net Gain in excess of the statutory minimum requirement.

2.0 INTRODUCTION

- 2.1 The following Ecological Impact Assessment (EclA) has been prepared by FPCR Environment and Design Ltd. (FPCR) on behalf of Bellway Homes Limited to accompany an outline planning application for the redevelopment of land located at Townsend Farm, Melksham (Central OS Grid Ref: ST 89945 62637) herein referred to as 'the Site'.
- 2.2 To inform this assessment, a suite of ecological surveys has been undertaken on the Site. The results of these surveys are discussed where relevant in this EclA report, with details of survey methodologies and results included in separate, appended reports which include:
- Badger Survey (FPCR, 2026)
 - Bat Survey (FPCR, 2026)
 - Breeding Bird Scoping Survey (FPCR, 2026)
 - Reptile Survey (FPCR 2026)
 - Dormouse Survey (FPCR, 2026)
 - Biodiversity Net Gain Report (FPCR, 2026)

Site Proposals

- 2.3 *Outline application for up to 225 dwellings, with access from Semington Road, along with public open space and landscape buffers to incorporate existing rights of way and to accommodate the route of the proposed Melksham Link Canal (under separate application W/12/01080/FUL). Demolition and clearance of all existing buildings and structures on the site. All matters reserved other than vehicular access from Semington Road.*

Site Context

- 2.4 The Site comprises approximately 11 hectares of agricultural land located to the south of Melksham and north of Berryfield. Residential development is currently under construction immediately north of the Site, while planning permission has recently been granted for residential development on adjoining land to the south. Semington Road and associated settlement lie along the eastern boundary, while Berryfield Lane forms the western boundary, beyond which is agricultural land.
- 2.5 The Site is predominantly an active cattle farm comprising three large pastoral field parcels and an associated farmstead containing a number of agricultural buildings, several of which are no longer in active use. The southern and south-western parts of the Site are managed separately and include a horse paddock, derelict former poultry sheds, an active storage compound, and a small livestock enclosure with associated buildings. Boundaries are defined primarily by hedgerows, with mature trees along the northern boundary and residential properties adjoining the eastern and western boundaries. Remnant buildings associated with the Site's former use as a World War II airfield also remain within the Site.

Report Aims and Objectives

- 2.6 This report has been prepared to achieve the following objectives:
- provide a summary of the methods and results of survey work to establish an ecological baseline;

- identify and describe all potentially significant ecological effects associated with the proposed development on important ecological features;
- set out the mitigation measures required to ensure compliance with nature conservation legislation and to address any potentially significant ecological effects;
- provide an assessment of the significance of residual effects;
- identify appropriate enhancement measures and consider biodiversity net gain; and
- set out the requirements for post-construction monitoring.

3.0 LEGISLATION AND POLICY

3.1 This report has been prepared to establish an Ecological Baseline and to conduct an Ecological Impact Assessment on Important Ecological Features as informed by relevant international, national and local legislation and policy. Detail on the relevant national and local policy and legislation for ecology in relation to development sites are provided in Appendix A. The national policy and legislation most relevant to this assessment include:

- The Conservation of Habitats and Species Regulations 2017 (CHSR) (as amended) in relation to the European Protected Species (EPS); and European protected sites i.e. Special Areas of Conservation (SAC), Special Protection Areas (SPAs) and internationally protected "Ramsar Sites" (collectively known as "National Site Network site" following the UK's exit from the EU).
- The Wildlife and Countryside Act (WCA) 1981 (as amended) in relation to all wild birds (including Schedule 1 species), other animals (notably Schedule 5 species), flora (those listed in Schedules 8 and 9) and Sites of Special Scientific Interest (SSSI);
- The Environment Act 2021 which covers a range of environmental protections and enhancements including requiring developments to demonstrate a mandatory biodiversity net gain following publication of secondary legislation;
- Protection of Badgers Act (PBA) 1992 which protects badgers *Meles meles* from killing or harm;
- Natural Environmental and Rural Communities (NERC) Act 2006 in relation to various priority species and habitats listed under Section 41 (S41);
- Hedgerow Regulations 1997 made under Section 97 of the Environment Act 1995;
- National Planning Policy Framework (NPPF) 2024 which sets out the government's planning policy for England including measure to conserve and enhance the natural environment by protecting and enhancing value landscapes, recognising the value and wider benefits of natural capital and minimising impacts/providing net gains for biodiversity;
- Local Nature Reserves (LNR) as designated most recently by the NERC Act 2006;
- Non-statutory protected local sites including County Wildlife Sites (CWS), Sites of Importance for Nature Conservation (SINC), Local Wildlife Sites (LWS) and Ancient Woodland Inventory (AWI) sites;
- Local Nature Recovery Strategy (LNRS); and
- British Trust for Ornithology's (BTO) Birds of Conservation Concern (BoCC).
- Wiltshire Local Plan: Planning for Melksham
- Joint Melksham Neighbourhood Plan 2 2020 - 2038
 - Policy 13: Biodiversity
 - Policy 17: Trees and Hedgerows

4.0 METHODOLOGY

Desktop Study

- 4.1 To compile existing baseline information, relevant ecological information was gathered from:
- Wiltshire and Swindon Biological Records Centre
 - Multi Agency Geographic Information for the Countryside (MAGIC) website (www.magic.defra.gov.uk)
 - Colour 1:25,000 OS base maps (www.ordnancesurvey.co.uk) and aerial photographs from Google Earth (www.maps.google.co.uk)
 - Bath and Bradford on Avon Bats SAC Core Areas¹
 - Trowbridge and Westbury Bat Mitigation Strategy Red² and Yellow Zones³
 - Wiltshire Local Nature Recovery Strategy
- 4.2 The search areas around the Site for biodiversity information, in relation to zones of influence and species significance, were as follows:
- 10km for sites of International Importance e.g. SACs, SPAs, Ramsar sites.
 - 2km for sites of National or Regional Importance e.g. SSSIs and species records e.g. protected, Local Biodiversity Action Plan (LBAP) and notable species.
 - 1km for sites of County Importance e.g. Biological Heritage Sites or Local Wildlife Sites (LWS).

UKHab Survey

- 4.3 A field survey was conducted on the 27th May 2026. Survey methods broadly followed the UK Habitat Classification System⁴ (UKHab) to map habitats present on Site. This involved a systematic walk over of the Site to classify the broad habitat types and identify any Habitats of Principal Importance (HPI) for the conservation of biodiversity as listed within Section 41 (S41) of the NERC Act 2006. Habitats were broadly mapped in the field using a detailed topography map produced for the scheme using pens or pencils as appropriate.
- 4.4 Where feasible, target notes and species lists were compiled for individual areas and assessments of abundance were made using the DAFOR scale. Vascular plant nomenclature follows the latest edition of Stace⁵. Whilst the species lists collected should not be regarded as exhaustive, sufficient information was gained during the survey to enable classification and assessment of broad habitat types and identify features likely to be of interest.
- 4.5 Consideration has been given as to the presence of invasive species listed on Schedule 9 of the WCA 1981 (as amended) and the presence of any notable weeds including those covered under the Weed Act 1959 (where population is significant enough to be considered injurious).

¹Wiltshire Council, 2025. Bath and Bradford on Avon Bats SAC Core Areas. Published February 2025. Available at: <https://storymaps.arcgis.com/stories/a31c43f3fed94bf4a527c10dc8129fe1> (Accessed 23 July 2026)

²Wiltshire Council, 2025. Trowbridge and Westbury Bat Mitigation Strategy Red Zone. Adopted July 2005. Available at: <https://storymaps.arcgis.com/stories/604f26d699e441068f4e9ee723bdaae4> (Accessed: 23 July 2026)

³Wiltshire Council, 2005. Trowbridge and Westbury Bat Mitigation Strategy Yellow Zone. Adopted July 2005. Available at: <https://storymaps.arcgis.com/stories/306cb66d1f2e4efeb5a57a6b742618ba> (Accessed 23 July 2026)

⁴Butcher, B., Edmonds, B., Norton, L., & Treweek, J. (n.d.) The UK Habitats Classification System V2. UKHab. Available at: <https://ukhab.org/>

⁵Stace, C.A. (2019) New Flora of the British Isles (4th Ed.). Cambridge: Cambridge University Press

Faunal Surveys

- 4.6 Following the initial assessment of the Site for protected/notable species potential, a series of further surveys were completed in 2026. These are summarised in *Table 1* below and details are contained within the appended reports (*Appendix F-I*).

Table 1: Faunal Surveys Overview

Ecological Feature	Overview of Surveys Completed
Badgers	Thorough search for evidence on 4 th March 2026.
Bats	Habitat suitability assessment on 27 th May 2026.
	Building Preliminary Roost Assessment (PRA) on 10 th June and 27 th July 2026.
	Static detectors in buildings 8 and 11 on 3 rd December and 17 th December 2025.
	Water tower emergence survey on 8 th June 2026.
	Ground level tree assessment (GLTA) on 9 th April 2026.
	Seasonal night-time bat walkover (NBW) surveys in April, May and July 2026.
	Monthly static detector surveys with four detectors deployed in fixed locations between May-July 2026. Statics will be deployed in August and September 2026.
Breeding birds	Single scoping breeding bird survey was undertaken on 11th May 2026
Great crested newt (GCN) <i>Triturus cristatus</i>	Scoping assessment based on desk study and site assessment.
Hazel dormouse <i>Muscardinus avellanarius</i>	A total of 50 tunnels were installed on 1 st June 2026 and checked at two-week intervals from 8 th June 2026 onwards. Surveys are on-going.
Reptiles	Presence/likely absence survey commenced on 21 st May 2026 and are on-going.

Survey Personnel

- 4.7 All ecology surveys were completed by experienced and suitably trained ecologists. Details of personnel, relevant qualifications and licences are provided in *Appendix B*.

Impact Assessment

- 4.8 The assessment of significant ecological effects has been undertaken in accordance with CIEEM EclA guidelines. Details of the assessment methodology followed are provided in *Appendix A*, however in summary, the process involves:

- **Establish Baseline** – this is based on desk study and field surveys which describes the existing and potential Important Ecological Features (IEFs) within the zones of influence specified.
- **Determine the Scale of Importance of Ecological Features** - importance is determined using geographical frames of reference: Local, Country, Regional, National and International. This assessment is based on a variety of factors, including statutory protection, statutory designation, conservation status, abundance and rarity.
- **Assess Significant Ecological Effects** –based on the importance of the ecological feature, magnitude of the effect and sensitivity of the features considered. This is description-based rather than applying a matrix which considers construction and operation effects only where relevant. The assessment assumes the proposed layout,

intrinsic mitigation and routine ecological mitigation normally conditioned, and these are outlined clearly.

- **Mitigation** – This will be based on the mitigation hierarchy – avoidance, mitigation, compensation and enhancement. Any further mitigation measures required will be outlined to ensure residual effects are lowered to a level considered acceptable. Enhancements will seek biodiversity net gain in line with the NPPF and Local Plan Policy DP19: Biodiversity, Geological Conservation and Green Infrastructure. Monitoring will be considered where applicable.
- **Future Baseline and Residual Effects** – final conclusionary statements for the short, medium and long term.

Limitations

- 4.9 At the time of writing, the targeted surveys for hazel dormouse and reptiles are ongoing and therefore the field data is incomplete. Surveys will continue through the 2026 season and conclude prior to determination. This is not considered a significant constraint due to the sympathetic masterplan and the inclusion of assumption of presence through mitigation measures such as precautionary working methods during site clearance and appropriate compensation and enhancement recommendations.
- 4.10 The UKHab survey took into consideration the presence of invasive non-native species, however this survey did not constitute a full survey for the presence of this group which would come with its own survey requirements.

5.0 RESULTS

Desktop Study

- 5.1 The locations of designated Sites identified through the desktop study search area have been presented on *Figure 1*.

Statutory Designated Sites

- 5.2 One statutory designated site was identified within 10km of the Site using MAGIC; Bath & Bradford on Avon Bats SAC.

Table 2: Statutory Designated Sites within the Desktop Study Search Area

Site Name	Distance from Site at Closest Point	Description (as provided by MAGIC)
Bath & Bradford on Avon Bats SAC	8.5 km	This site comprises extensive networks of caves, mines and man-made tunnels which are used by bats for hibernation, mating and as a staging post prior to dispersal. It also includes areas of calcareous grassland, scrub and woodland which are used as feeding and commuting habitat by the bats. Qualifying species: The site is designated under article 4(4) of the Directive (92/43/EEC) as it hosts the following species listed in Annex II: • Bechstein's bat <i>Myotis bechsteinii</i> • Greater horseshoe bat <i>Rhinolophus ferrumequinum</i> • Lesser horseshoe bat <i>Rhinolophus hipposideros</i>

SSSI Risk Impact Zones

- 5.3 The Site sits within Natural England's SSSI Risk Impact zone for infrastructure proposals including airports, helipads, and other aviation proposals. As the proposals do not include these features, a Natural England consultation is not required.

Nutrient Neutrality

- 5.4 The Site does not sit within any Nutrient Neutrality Catchments.

Non-Statutory Designated Sites

- 5.5 Two non-statutory designated sites were identified by WSBRC within a 2km radius of the site.

Table 3: Non-Statutory Designated Sites within the Desktop Study Search Area

Site Name	Distance from Site at Closest Point	Description (as provided by WSBRC)
Conigre Mead WWT Reserve LWS	0.8 km	A small wet fen-meadow on the outskirts of Melksham, managed as a nature reserve comprising neutral grassland and extensively planted with trees and shrubs. The BAP Priority Habitat 'Lowland Fens; Ponds; Wet woodland' is present.
Bristol Avon River LWS	0.6 km	One of the main river systems draining northwest Wiltshire.

Protected/Notable Species

- 5.6 The protected species records provided by WSBRC are summarised below. Locations of records are shown on *Figure 2* and further details are presented in Appendix E.

- 5.7 Twelve species/species groups of bats were identified within the 2km radius. This included widespread and common bat species, as well as Daubenton's bat *Myotis daubentonii*, whiskered bat *Myotis mystacinus*, brown long-eared bat *Plecotus auritus*, and lesser horseshoe bat *Rhinolophus hipposideros*.
- 5.8 Records for 60 bird species were returned.
- 5.9 Six great crested newt records were within the search radius but over 500m from the Site boundary. Other amphibians included common frog *Rana temporaria* and common toad *Bufo bufo*.
- 5.10 Records for slow-worm sightings *Anguis fragilis* and three grass snake *Natrix Helvetica* were located 490m away.
- 5.11 Records for non-bat mammals only included badger, otter *Lutra lutra*, and water vole *Arvicola amphibius*.
- 5.12 Records for notable invertebrate species included marsh fritillary *Euphydryas aurinia*.

Field Survey

UKHab Survey

- 5.13 The locations of the habitats described below are illustrated in *Figure 3: Baseline Habitat Plan*.

Modified Grassland

- 5.14 Three larger fields in the north of the site (G1, G2 & G3) comprised modified grassland and formed the majority of the habitat on site. At the time of survey, G2 was short and cattle-grazed, whereas G1 and G3 were ungrazed and characterised by a longer sward. All three fields were grass-dominated (>80% cover), species-poor (4 to 6.6 species per m²) and agriculturally improved in character, supporting a limited diversity and abundance of broadleaved herbs. Each field is described below.
- G1 was characterised by abundant rough meadowgrass *Poa trivialis*, meadow foxtail *Alopecurus pratensis*, with locally abundant Yorkshire fog *Holcus lanatus* and red fescue *Festuca rubra*. Other grasses frequently present were cock's-foot *Dactylis glomerata*, sweet vernal-grass *Anthoxanthum odoratum*, creeping bent *Agrostis stolonifera*, perennial ryegrass *Lolium perenne* and occasional soft brome *Bromus hordeaceus*. Broadleaved herbs were limited and comprised of occasional meadow buttercup *Ranunculus acris*, cut-leaved cranesbill *Geranium dissectum* and occasional spear thistle *Cirsium vulgare*.
 - G2 was dominated by perennial ryegrass and Yorkshire fog, with frequent rough meadowgrass and false oatgrass *Arrhenatherum elatius*, and locally abundant sweet vernal-grass and occasional creeping bent. Broadleaved herbs included creeping thistle *Cirsium arvense*, cut-leaved cranesbill and occasional meadow buttercup *Ranunculus acris*.
 - G3 was characterised by abundant perennial ryegrass with creeping bent and rough meadowgrass frequent throughout. Yorkshire fog occurred occasionally. Broadleaved herbs included meadow buttercup, creeping buttercup *Ranunculus repens*, white clover *Trifolium repens* and occasional creeping thistle.
- 5.15 None of the grasslands above met the 3 required criteria to be considered as medium distinctiveness other neutral grassland, failing on having less than 20% cover of broadleaved herbs and sedges and had less than an average of 8 species per m² in the quadrats undertaken.
- 5.16 The modified grassland is considered of Site Importance.

Other Neutral Grassland

- 5.17 The southern field comprised a species-poor (G4; 6.4 species per m) grassland divided into horse-grazed paddocks. The species assemblage reflected intensive horse grazing and poaching; however, the relatively high forb cover (42%) and the limited perennial ryegrass and white clover (20%), suggest a lower degree of agricultural improvement. The had patches of bare ground throughout. The main components of the sward were creeping bent, meadow buttercup, rough meadowgrass, perennial ryegrass and creeping buttercup, with frequent white clover, while Yorkshire fog, cock's-foot and red fescue occurred occasionally. Additional herbs included red clover *Trifolium pratense*, greater plantain and creeping cinquefoil *Potentilla reptans*.
- 5.18 To the west of the farm buildings was a small area of successional vegetation in a former pig enclosure located to the west of the with two pig arks present. Grasses comprised 60% of the sward and included abundant with rough meadowgrass, and false oatgrass, frequent Yorkshire fog common bent, cock's foot, locally abundant barren brome and occasional soft brome. The forb component was dominated by ruderal species, mostly creeping thistle, broad-leaved dock and common nettle. Other ruderals present included spear thistle, bristly oxtongue *Helminthotheca echinoides*, hedge bindweed *Calystegia sepium*, hogweed *Heracleum sphondylium*, creeping buttercup, cut-leaved cranesbill, common mouse-ear *Cerastium fontanum*, common cat's-ear *Hypochaeris radicata* and white clover *Trifolium repens*.
- 5.19 Between the two poultry sheds were two strips of species poor (3.8 species m²) semi-improved grassland. False oatgrass was the dominant grass species, along with locally abundant Yorkshire fog, barren brome, Cock's foot and common couch *Elymus repens*. Herbaceous species, which made up 38% of the sward, were mostly ruderal or characteristic of disturbed ground, with local dominance of common nettle, abundant cleavers *Galium aparine* and frequent hogweed, cut-leaved cranes bill, common vetch *Vicia sativa* and occasional cow parsley, field bindweed *Sonchus asper*, prickly sow thistle *Sonchus asper*. Low forming bramble was occasional.
- 5.20 All the other neutral grassland onsite is species poor (<10 species per 1m²) and are poor representations of the habitat and therefore considered of Site Importance.

Tall Forb

- 5.21 West of the former poultry farm was an area on disturbed ground and storage in active use; here was an area of tall forb vegetation (U5). Species recorded included creeping thistle, cleavers, cow parsley *Anthriscus sylvestris*, hogweed, teasel *Dipsacus fullonum*, broad-leaved dock, hedge garlic *Alliaria petiolata*, field poppy *Papaver rhoeas*, smooth sow-thistle *Sonchus oleraceus*, foxglove *Digitalis purpurea*, ribwort plantain *Plantago lanceolata*, ragwort *Jacobaea vulgaris*, prickly lettuce *Lactuca serriola*, musk mallow *Malva moschata*, and green alkanet *Pentaglottis sempervirens*. Occasional common nettle (*Urtica dioica*) was also recorded. Developing scrub species included goat willow *Salix caprea* and Buddleia *Buddleja davidii*. Some nettle patches were also present along the margins (U4). These habitats are of Site Importance

Sparsely Vegetated Land

- 5.22 Located centrally to the east of the site, was an area classified as sparsely vegetated land (U1) that comprised a small storage yard with a central area of bare ground, parked trailers and recently deposited materiel. The habitat was characterised by a mosaic of bare ground and low sparse vegetation with increased vegetation cover towards the hedgerow boundary. The

vegetation comprised of patchy coarse grasses, ruderal herbaceous species, and low-spreading bramble *Rubus fruticosus* agg., barren brome *Anisantha sterilis*, and creeping thistle were abundant and soft brome and creeping cinquefoil were abundant locally. Frequent species included false oatgrass, white clover, Yorkshire fog, bramble, cock's-foot, rough meadowgrass, cow parsley, hemlock *Conium maculatum*. Occasional species included common nettle, spear thistle, broad-leaved dock, ragwort, teasel, burdock *Arctium* spp., nipplewort *Lapsana communis*, and caper spurge *Euphorbia lathyris*, bird's-foot trefoil *Lotus corniculatus* and dandelion *Taraxacum* agg. were rare. This habitat is considered of Site Importance.

- 5.23 In the east of the site were enclosures with evidence of recent heavy livestock that was classified as ephemeral (U2). The vegetation was species-poor, short and heavily disturbed, with abundant bare ground and white clover. Species indicative of nutrient enrichment and disturbance included broad-leaved dock *Rumex obtusifolius*, common nettle *Urtica dioica*, shepherd's-purse *Capsella bursa-pastoris*, curled dock *Rumex crispus*, greater plantain *Plantago major* and knotgrass *Polygonum aviculare*. Grasses were patchily distributed and included creeping bent, rough meadowgrass, annual, meadow-grass *Poa annua* and soft brome. This habitat is considered of Site Importance.

Ruderal or Ephemeral

- 5.24 Near to entrance was an area of actively mown short ruderal vegetation and annuals (U3), providing a lawn for a caravan and entrance area, dominated by ruderal forbs ground ivy *Glechoma hederacea*, small-flowered cranesbill *Geranium pusillum* and cut-leaved cranesbill. This habitat is considered of Site Importance.

Scrub

- 5.25 Presence of scrub on the site was limited to five small areas. S1 was an area of with occasional hawthorn *Crataegus monogyna*, blackthorn *Prunus spinosa*, elder *Sambuca nigra*, eared willow and Buddleia. S2 was an area of dense mostly hawthorn scrub, with elder, English elm *Ulmus minor*, blackthorn *Prunus spinosa* and bramble. S3 and S4 were small areas of bramble scrub. Due to small amount present, the scrub onsite is considered of Site Importance.

Individual Trees

- 5.26 A medium sized individual tree was present, English Oak *Quercus Robur*. The tree was mature and considered of local importance.

Line of Trees

- 5.27 Two lines of tree were present. LT1 was a line of mature trees that comprised eight well-spaced horse chestnut *Aesculus hippocastanum*, four sycamore *Acer pseudoplatanus*, and one field maple *Acer campestre*. LT2 was a small and sparse line of eared-willow *Salix Arita* mostly coppiced stools. LT2 only was considered of local importance.

Hedgerows

- 5.28 Table 4 provides a summary description of each hedgerow and an assessment of their importance and priority habitat status.
- 5.29 All the priority habitat hedgerows onsite are considered to be **Local Value**.

Table 4: Hedgerow Summary

Ref	Length	Description	Priority Habitat?	Important under REGS?
H1	202m	Native hedgerow with trees. Tall structure with continuous structure and limited management. Shrub layer comprised, hawthorn, blackthorn, English elm, elder, dog rose <i>Rosa canina</i> , dog wood <i>Cornus sanguinea</i> , crab apple <i>Malus sylvestris</i> and ash <i>Fraxinus excelsior</i> . Mature ash present. Average species 3.5.	Yes	No
H2	89m	Native hedgerow with trees. Messy structure with limited management. Shrub layer comprised field maple, sycamore <i>Acer pseudoplatanus</i> , elder, hawthorn, ash, blackthorn, dog rose, hazel and goat willow <i>Salix caprea</i> . Bramble abundant. The hedge was adjacent to a footpath with an average of 4.0 species, had four connections and gaps less than 10%.	Yes	Yes
H3	108m	Species-rich native hedgerow. Messy structure with limited management. Shrub layer comprised hawthorn, elder, dog rose, English elm and blackthorn. Average 5.0 species.	Yes	No
H4	110m	Native hedgerow. Overtrimmed, thin and gappy, with dominance of bramble. Shrub layer hawthorn, English elm, blackthorn, and elder. Average 3.0 species.	No	No
H5	117m	Native hedgerow with trees. Form was a row of trees with a continuous native shrub layer. Shrub species included hawthorn, elder, blackthorn, and English elm, with five well-spaced mature trees horse chestnut <i>Aesculus hippocastanum</i> (3), singles sycamore (2) and ash (3). Average 4.0 species.	Yes	No
H6	105m	Native hedgerow. Mixed structure with semi-mature trees, limited management. Thin low and gappy and bramble dominant along much of its length. Shrub layer comprised hawthorn, elder and blackthorn. Average 2.0 species.	Yes	No
H7	279m	Native hedgerow with trees. Shrub layer blackthorn, hawthorn, elder, and dogwood, with semi-mature eared willow (1), and ash (3) specimens. Average 3.0 species.	Yes	No
H8	139m	Native hedgerow with trees. Thin, overtimmed hedge. Shrub layer comprised eared-willow, hawthorn, blackthorn and dog rose. Mature crack willow <i>Salix fragilis</i> and ash present. Average 2.0 species.	Yes	No
H9	129m	Native hedgerow. Relatively well-structured dense hedge. Shrub layer comprised blackthorn, hawthorn, elder, English elm, cypress sp. Average 3.5 species.	Yes	No
H10	90m	Native hedgerow. Thin and low section of hedge. Shrub layer comprised blackthorn, elder, hawthorn. Average 3.0 species.	No	No

5.30 The Site is considered to have the potential to support the following species/groups:

- Badger
- Bats
- Breeding birds
- Hazel dormouse
- Reptiles

5.31 Full details of the further surveys are provided in the appended reports; however, Table 5 summarises the key findings during such specific surveys.

Table 5: Summary of Protected / Notable Species Assessments

Species/ Group	Site Suitability Assessment
Badger (Appendix F)	WSBRC returned 6 records of badger within 1km of the Site, with the most recent record for a sett onsite in 2022. Badgers have been confirmed as present onsite. Field surveys conducted in 2026 identified four setts within the Site boundary, including three subsidiary, and one outlier. Due to the confidential nature of records for this species, further information regarding badger activity and sett location has been provided in the confidential badger report appended to this EclA. Badger are common and widespread in England and the Site is therefore considered to be of no more than Local value for this species. The Protection of Badgers Act 1992 however requires development proposal to have regard for this species.
Bats (Appendix G)	There are several buildings on-site associated with a former pig farm. The structures vary from low breeze block and corrugated tin animal sheds to larger open-sided barns. A brick-built water tower associated with past use of the site prior to pig farming was also present. The majority of buildings were disused and dilapidated, having not been maintained. A few were still in use for storage, containing farm equipment and refuse, with one unit still being used as a tool shed, or continuing to house livestock, including cattle and horses. Building B14 was confirmed as a roost following a record of a single lesser horseshoe bat. B5 (tower) was assessed as holding low-moderate potential for roosting bats, B15 and B16 were assessed as holding high potential and B17 and B18 were assessed as holding low potential. B2 - B13 were all assessed as negligible. One building was a confirmed roost, one building held low-moderate potential, two held low potential and two held high potential to provide suitable roosting habitat. The Site is therefore considered to be of Local importance for roosting bats Fourteen groups of trees and ten individual trees were assessed during GLTAs. In total, five groups were assessed as holding low potential and the rest were negligible. One crack willow (T6) held moderate potential, one hawthorn held low potential, and the remaining trees held negligible potential. T6 was subject to an endoscope survey on 27th July 2026. All crevices which were reachable from the ground were assessed and no evidence of bats or individual bats were recorded during the survey. Two trees provide suitable roosting habitat. The Site is therefore considered to be of Local importance for roosting bats. The habitats on Site were of moderate value for bats. The managed fields, which dominate the Site, offer some limited opportunities for bats though are likely to be lacking in an abundance of potential invertebrate prey. However, the trees and hedgerows do provide continuous habitat for foraging and commuting and they also provide connectivity to habitats in the wider area. NBW surveys showed common pipistrelle, soprano pipistrelle, serotine, noctule and myotis spp. active across the Site, mostly commuting and occasionally foraging. Static detector surveys showed soprano pipistrelle, myotis spp., Barbastelle, serotine, Nathusius' pipistrelle, lesser horseshoe, noctule, long-eared sp., greater horseshoe, and nyctalus sp. active across the Site. The Site provides foraging and commuting habitat for an assemblage of common and widespread bat species and is therefore considered to be of Local importance.
Birds (Appendix H)	A total of 19 bird species were recorded within and immediately adjacent to the Site. The assemblage was typical of poor-quality agricultural grassland habitats in an urban fringe setting with hedgerows, scattered trees and existing farm buildings. Several species recorded are listed as Birds of Conservation Concern (BoCC) Red or Amber List species and/or Species of Principal Importance under Section 41 of the Natural Environment and Rural Communities Act 2006, including house sparrow, greenfinch, starling, stock dove and dunnock. The Site provides some foraging and breeding habitat for an assemblage of widespread generalist bird species, particularly within the hedgerows. It is considered to be no more than of Local importance.
Great crested newt	No established waterbodies onsite or within 250m of the Site boundary. The nearest known waterbodies within 500m are newly created SUDs features along Telford Drive, the closest of which is 289m from site across Semington Road, and ponds to the northwest on the western side of Western Way A320. There are no known great crested newt ponds within 500m of the application boundary. Great crested newt have been scoped out of this assessment.

Species/ Group	Site Suitability Assessment
Hazel dormouse (Appendix J)	Data obtained from WSBRC and MAGIC did not identify any records or any previously granted European Protected Species Licences (EPSLs) of hazel dormouse within 2km of the site. Hedgerows and woodland provide woody linear habitat with the potential to support hazel dormouse, though, several hedgerows are fragmented or gappy and interrupted by fence lines, limiting the overall suitability of the Site for dormice. The Site provides some suitable habitat for hazel dormouse, particularly within hedgerow and it is therefore considered to be no more than of Local importance.
Reptiles (Appendix I)	Reptile records within 1km of the Site include grass snake and slow worm records, both c. 490m to the southeast of the Site. The Site low suitability for reptiles due to it consisting largely of grazed grassland. The majority of the Site offers limited potential to support reptiles; the margins do, however offer a degree of suitability as commuting habitat for reptile species such as grass snake and slow-worm. Presence/likely absence surveys did not identify any reptile populations onsite. The majority of the Site provides low suitability habitat for reptiles however; the margins and hedgerows do provide some higher suitable areas which reptiles may use for commuting and resting purposes. These areas are also connected to the wider landscape where there is further higher suitable habitat present. The grassy margins on this Site are therefore considered to be of local importance for reptile species.

Summary of Important Ecological Features

- 5.32 The suite of surveys has demonstrated that the proposals have the potential to affect a range of important ecological features (IEF). These are summarised in *Table 6* and assigned a geographic context based on survey results, relevant legislation and policy.

Table 6: Summary of Important Ecological Features

IEF	Relevant Legislation/Policy	Geographic Scale
Bath & Bradford on Avon Bats SAC	CHSR, Environment Act, WCA, NERC S41, NPPF	International
Conigre Mead WWT Reserve LWS	Environment Act, NERC, NPPF	County
Bristol Avon River LWS	Environment Act, NERC, NPPF	County
Individual trees (T1) and Line of trees (LT2)	Environment Act, NPPF	Local
Hedgerow	NERC S41, Hedgerows Regulations, NPPF, Environment Act	Local
Badger	Badger Act	Local
Bats	CHSR, WCA Sch 5, NERC S41	Local
Breeding Birds	WCA, NERC S41	Local
Hazel dormouse	CHSR, WCA Sch 5, NERC S41	Local
Reptiles	WCA, NERC S41	Local

6.0 DISCUSSION

Embedded Mitigation

6.1 From the early stages of the landscape design through to submission, ecological constraints and opportunities have informed the design of the scheme, ensuring that appropriate avoidance and embedded mitigation measures are incorporated. This includes the provision of sufficient green infrastructure to accommodate protected species mitigation, deliver habitat enhancements, and contribute towards achieving the site's 10% Biodiversity Net Gain (BNG) requirement. The measures include:

- 10 m buffer along the hedgerows and lines of trees on the northern and southern site boundaries, providing habitat protection and enhancement and maintaining connectivity with the adjacent habitat networks.
- Retention and strengthening of existing vegetation along the western boundary adjacent to Berryfield Lane through additional native planting, reinforcing the rural edge of the site and providing links to the wider habitat network.
- Hedgerow loss has been minimised, with some central hedgerow sections necessarily removed as part of the proposed layout. The boundary habitat network will be retained and enhanced, with retained sections of internal hedgerow and scrub incorporated within the proposed green space to maintain habitat continuity and structural diversity across the site.
- Green infrastructure (GI) will include centrally located green space along the consented canal route, providing opportunities for habitat creation and enhancement, including species-rich grassland, mixed scrub and woodland habitats.
- SuDS basins within the proposed green space, incorporating wetland habitats and increasing the diversity of habitats available on site.
- Retention of mature trees of ecological and landscape value, with root protection areas (RPAs) appropriately buffered, together with opportunities for new tree planting throughout the development.

Biodiversity Net Gain and Habitat Enhancements

- 6.2 The scheme as proposed will result in a -4.07% loss in habitat units, and a -28.40% loss in hedgerow units. This assessment has therefore demonstrated that the proposals will require amending to deliver the requisite 10% gain on site, or an offsite solution sought.
- 6.3 Feasibility studies have determined that achieving a 10% biodiversity net gain for both habitats and hedgerows on site is feasible if the scheme is altered for management of a significant proportion of the site specifically for biodiversity, rather than the more balanced approach as detailed in this report. The details of this will be set out at reserve matters however there are no concerns that achieving a 10% net gain on this scheme is possible.
- 6.4 There is space within the scheme design to accommodate the required length of hedgerow to achieve a 10% net gain. Hedgerow locations should be targeted towards placement that will maximise ecological value such as improving the connectivity along the boundaries, linking the created habitats, and maintaining an east-west corridor through the centre of the Site.

Standard Mitigation - Core Documents

- 6.5 The following lists the core documents that will secure the mitigation and enhancement measures described in this report. They can be secured through appropriately worded pre-commencement planning conditions, attached to the application to be submitted and discharged prior to the commencement of works.
- Construction and Ecological Management Plan (CEcMP): to ensure protected species are not unlawfully harmed during ground clearance, earthworks and during construction. The document will include an Ecological Constraints and Mitigation Plan drawing that clearly shows the location of constraints and details mitigation required, where necessary. This will also provide measures for removal WCA Sch9 Invasive Non-native plant species from the Site.
 - Habitat Management and Monitoring Plan (HMMP): this provides habitat creation and enhancement information for ecology features and their management for an appropriate period. This document can be conditioned and submitted prior to or alongside the Biodiversity Gain Plan once full planning permission has been received.
 - Ecological Enhancement Plan to detail the bat and boxes, and other artificial enhancements features, to be installed across the site.

Assessment of Significant Ecological Effects

- 6.6 The status of the important ecological features (IEFs) identified within the survey area have been reviewed against the proposals and intrinsic mitigation to determine whether there are any impact pathways and whether any of these will lead to a likely significant effect. The requirement for additional mitigation measures above the intrinsic mitigation has been considered for each of the IEFs where they can reduce the scale of negative effects or encourage a positive effect.

HedgerowsAssessment of Impacts

- 6.7 The Site supports an extensive network of predominantly native hedgerows, the majority of which qualify as Priority Habitat. These hedgerows provide valuable wildlife corridors, support a range of breeding birds and other protected species, and form an important component of the wider green infrastructure network. One hedgerow (H2) also qualifies as an Important Hedgerow.
- 6.8 The indicative layout has been designed to retain the majority of the boundary hedgerows and minimise losses internally wherever practicable. Approximately 490m in total of internal hedgerows H7 and H8 will require removal to facilitate access and the proposed development parcels. Whilst this will result in the localised loss and fragmentation of habitat, the retained boundary network will continue to provide connectivity across the Site and to the wider landscape.
- 6.9 Construction activities adjacent to retained hedgerows also have the potential to result in indirect impacts through accidental damage, root compaction, dust deposition and pollution. During operation, increased lighting could reduce the value of retained hedgerows as commuting habitat for bats and other wildlife if not appropriately controlled.
- 6.10 The proposed green infrastructure strategy retains the principal hedgerow network, incorporates generous undeveloped buffer zones and provides opportunities to strengthen

habitat connectivity through native planting. Consequently, the proposals are not expected to result in significant adverse effects on the local hedgerow resource.

6.11 Predicted Effect: Not Significant at a Local Level

Mitigation, Compensation and Enhancement

6.12 Retained hedgerows will be protected throughout construction by appropriately designed protective fencing in accordance with a CEMP, with exclusion zones established to prevent encroachment by plant, storage of materials or changes in ground levels. Any works adjacent to retained hedgerows will be undertaken in accordance with arboricultural and ecological best practice.

6.13 Where removal of hedgerow sections is unavoidable, this will be minimised to the shortest practicable lengths required to facilitate the development. Replacement native species-rich hedgerows will be planted within the green infrastructure network to compensate for losses and strengthen ecological connectivity across the Site. Existing hedgerows will also be enhanced through infill planting of locally appropriate native woody species where gaps occur and by adopting a sympathetic long-term management regime to improve structural diversity and flowering and fruiting potential.

6.14 A sensitive lighting strategy will ensure that retained hedgerows continue to function as dark commuting corridors for bats and other nocturnal wildlife by minimising light spill onto retained vegetation. The HMMP will secure the long-term management of retained and newly created hedgerows, ensuring they continue to mature and increase in ecological value over time.

6.15 Predicted Residual Effect: Not Significant Effect at a Local Level

Badgers

Assessment of Impacts

6.16 The proposals have the potential to damage, destroy or disturb badger setts S1, S2, S3 and S4 during construction and could result in the injury or mortality of badgers through groundworks within 30m of active setts, entrapment in open excavations or exposed pipework, and road traffic collisions during both the construction and operational phases. In the absence of mitigation, these impacts could result in offences under the Protection of Badgers Act 1992.

6.17 The development will also result in the loss of arable and improved pasture habitats currently used for badger foraging; however, these habitats are of relatively low suitability, evidence of badger use is limited, and similar habitats are abundant within the surrounding landscape. Consequently, habitat loss is not considered likely to have a significant effect on the local badger population.

6.18 Following detailed design at the Reserved Matters stage, the need for temporary or permanent closure of affected setts will be reviewed, where necessary under an appropriate licence. The provision of extensive green infrastructure, including species-rich grassland, will enhance long-term foraging and setting opportunities for badgers.

6.19 Predicted Effect: Not Significant at a Local Level

Mitigation, Compensation and Enhancement

6.20 Where required, impacts to badger setts will be managed under a Natural England mitigation licence, supported by pre-construction monitoring and update surveys to confirm sett status. A range of good practice measures will be implemented during construction through a CEMP to

avoid injury, mortality and disturbance to badgers, including toolbox talks for site personnel, safeguards for excavations and pipework, appropriate site housekeeping, and measures to minimise disturbance from construction activities.

- 6.21 During the operational phase, traffic calming measures on internal roads will reduce the risk of vehicle collisions with badgers. Together, these measures will avoid or minimise adverse effects on badgers and ensure compliance with relevant wildlife legislation.
- 6.22 Predicted Residual Effect: Not Significant Effect at a Local Level

Bats

Assessment of Impacts

- 6.23 The day roost recorded in building B1 will be lost to accommodate the proposal.
- 6.24 Existing trees and hedgerow will be retained in the proposal but will be subject to disturbance during both construction and operation. Bats will benefit from general GI plans including the provision of species-rich grassland, mixed scrub, SuDS features, and native tree planting, which will create improved foraging and commuting habitat compared with the existing modified grassland.
- 6.25 Predicted Effect: Minor Adverse Effect at a Local Level

Mitigation, Compensation and Enhancement

- 6.26 A licence will be needed to remove the confirmed roost within building B1.
- 6.27 Subject to the findings of further surveys, an appropriate replacement roost for the lesser horseshoe bat will be provided within a suitable, unlit location that maintains connectivity with the wider landscape, with the detailed design informed by the survey results.
- 6.28 A sensitive lighting strategy will be designed for the Site with regards to good practice guidance in order to retain the functionality of bat commuting habitat across the Site. This is particularly important for the light-averse bat species which have been recorded using the Site, including lesser horseshoe bat, greater horseshoe bat, and Barbastelle. This is especially important for along the boundaries to the north and south where the majority of the development will be positioned.
- 6.29 Where hedgerow removal is required to facilitate access, hop-overs will be incorporated to maintain commuting routes for bats.
- 6.30 The development should seek to provide roosting opportunities for the local bat population by installing bat boxes on existing mature trees located at the boundaries, as well as incorporating bat bricks into the built fabric of residential dwellings. Bat boxes and bricks should be arranged around the development close to green infrastructure and on different aspects, to encourage choice of a variety of alternative roost sites.

Predicted Residual Effect: Not Significant Effect at a Local Level

Breeding birds

Assessment of Impacts

- 6.31 The breeding bird survey recorded an assemblage of common and widespread species typical of agricultural land on the urban-rural fringe. The majority of breeding activity was associated with the Site's hedgerows, scattered trees and farm buildings, with the species-poor grazed

grassland providing relatively limited nesting and foraging opportunities. Several species of interest were recorded including house sparrow, starling, greenfinch, stock dove and dunnock.

- 6.32 The proposed development will result in the removal of sections of internal hedgerow, areas of grassland and a number of existing farm buildings, resulting in the loss of some nesting and foraging habitat. Vegetation clearance undertaken during the bird breeding season also has the potential to result in the damage or destruction of active nests, which are protected under the Wildlife and Countryside Act 1981 (as amended).
- 6.33 The scheme has been designed to retain the majority of the Site's boundary hedgerows and mature trees, which represent the principal breeding and commuting habitats for birds. In addition, the provision of extensive green infrastructure, including species-rich grassland, native hedgerow planting, mixed scrub, woodland planting and SuDS features, will substantially increase habitat diversity and create a more varied mosaic of habitats than currently exists. These habitats will provide enhanced nesting, foraging and shelter opportunities for a range of bird species during the operational phase.
- 6.34 Overall, whilst the proposals will result in the loss of some habitats used by breeding birds, the retention of the principal habitat network and delivery of extensive habitat creation means that significant adverse effects are not anticipated.
- 6.35 Predicted Effect: Not Significant Effect at a Local Level

Mitigation, Compensation and Enhancement

- 6.36 Vegetation clearance, demolition of buildings and any works affecting potential nesting habitat will be undertaken outside the core bird breeding season (March to September inclusive, where practicable). Where this is not possible, works will be preceded by an inspection by a suitably qualified ecologist to confirm the absence of active nests. Should active nests be identified, an appropriate exclusion zone will be established until young birds have fledged naturally.
- 6.37 Retained hedgerows and trees will be protected throughout construction in accordance with the CEMP, with appropriate protective fencing and exclusion zones to prevent accidental damage. A sympathetic lighting strategy will also minimise disturbance to retained habitats.
- 6.38 The landscape proposals will include new native species-rich hedgerows, scrub, woodland planting and species-rich grassland, providing additional nesting and foraging habitat across the Site. Opportunities for cavity-nesting birds will be enhanced through the installation of integrated bird boxes within new dwellings and purpose-built nest boxes on retained mature trees. The LEMP will specify the type, number and location of these features, while the HMMP will secure the long-term management of retained and created habitats to maximise their value for breeding birds.

Predicted Residual Effect: Not Significant Effect at a Local Level

Hazel dormouse

Assessment of Impacts

- 6.39 Targeted hazel dormouse surveys are ongoing and, although no field records have been identified to date, the assessment assumes the species is present within the Site until surveys are complete, due to their presence in the wider landscape. Hazel dormice utilise extensive networks of connected habitat, meaning that habitats within the Site contribute to the wider ecological network beyond the Site boundary. As such, the removal or management of suitable habitat as part of the proposed development would result in a direct reduction in habitat

connectivity and could create a localised pinch point within an existing movement corridor. Construction activities adjacent to retained scrub, trees, and hedgerows have the potential to disturb dormice through increased noise, vibration, dust deposition on forage species, and artificial lighting. During the operational phase, artificial lighting could further reduce the suitability of retained habitats for dormouse movement and foraging if not appropriately designed and managed.

- 6.40 Predicted Effect: Minor Adverse Effect at a Local Level (based on the assumption of presence)

Mitigation, Compensation and Enhancement

- 6.41 On completion of the field surveys, professional judgement will be applied, taking into account the extent and quality of habitat to be affected, the location of evidence of dormouse activity, if any, the opportunity to thoroughly inspect vegetation for dormice and nests prior to works, and the proposed timing and methods of vegetation clearance.
- 6.42 If hazel dormouse are confirmed as present onsite, it may be that an EPS licence may not be considered necessary for the proposed habitat management works. Guidance recognises that small-scale impacts may present a low risk of resulting in an offence, even where hazel dormice are present. Guidance advises that, where dormice are present, but the likelihood of an offence is low, works should proceed under a Precautionary Working Method Statement (PWMS) or similar. Therefore, if required, a PWMS will be prepared to set out the methodology for vegetation management.
- 6.43 During construction, protective fencing will be installed adjacent to retained hedgerows and scrub to prevent accidental damage, and retained vegetation will be excluded from material storage, site access and other construction activities. Vegetation clearance will be undertaken under ecological supervision where appropriate, and measures will be implemented to control dust generation and prevent deposition onto retained vegetation. A sensitive lighting strategy will also be implemented to maintain dark habitat corridors by minimising light spill onto retained hedgerows and other suitable dormouse habitat.
- 6.44 Any loss of suitable habitat associated with the proposals will be compensated through the planting of new mixed scrub and native species-rich hedgerows covering a larger area than will be lost.
- 6.45 Predicted Residual Effect: Not Significant Effect at a Local Level
- 6.46 Given the dormouse assessment currently follows a precautionary approach that assumes presence, it is important to note that the results of the completed dormouse surveys and the updated dormouse guidance (2025) will be used to update the dormouse assessment once the surveys are completed. Based on desktop study results alone, it is likely that dormice are absent locally (no records from within 2km in the last 10 years), however, this can only be confirmed upon the completion of surveys.

Reptiles

Assessment of Impacts

- 6.47 Records of slow worm and grass snake occur within approximately 490m of the Site, indicating that reptiles are present within the wider landscape. Two of the required seven checks for the reptile survey have been completed, to date no reptiles have been recorded; the Site is considered unlikely to support a population of reptiles greater than Local value.

- 6.48 The majority of the Site comprises regularly grazed and agriculturally improved grassland, offering limited opportunities for reptiles due to the short sward and low structural diversity. Areas of greater suitability are restricted to hedgerow margins, small areas of scrub and unmanaged grassland around the Site boundaries, which may provide occasional refuge, basking and dispersal habitat. These habitats are well connected to the surrounding landscape, where more extensive areas of suitable habitat are available.
- 6.49 The proposed development will result in the loss of some grassland and habitat margins and may temporarily disturb reptiles, if present, during vegetation clearance and groundworks. Partial removal of sections of internal hedgerow may also reduce local connectivity. However, the retention of the majority of boundary habitats together with the provision of extensive green infrastructure will maintain habitat connectivity across the Site and provide replacement habitat of higher ecological quality than much of the existing improved grassland.
- 6.50 Given the generally low suitability of the Site and the availability of suitable habitat within the surrounding landscape, significant effects on reptiles are not anticipated.

6.51 Predicted Effect: Uncertain at a Local Level

Mitigation, Compensation and Enhancement

- 6.52 Protective measures will be secured in the CEMP. Vegetation clearance should be undertaken using a phased strip-and-search approach to progressively reduce habitat suitability and encourage dispersal of any reptiles that may be on Site into retained habitats. Habitat removal should proceed directionally toward retained habitat corridors and works should be conducted under ecological supervision.
- 6.53 Replacement habitat will be incorporated in the landscape plan through native planting and creation of refuge features within retained landscape areas.
- 6.54 Log piles and habitat management measures should be incorporated throughout retained habitat areas to improve long-term habitat quality and increase opportunities for shelter and overwintering.

Predicted Residual Effect: **Not Significant Effect at a Local Level**

Other Species

Hedgehogs

- 6.55 Given the nature of the locality, it is considered likely that hedgehog would be present onsite. The habitat enhancement to be delivered by the proposals will improve the Site for this species and the recommendations provided to protect badgers during construction operations will also help prevent harm to hedgehogs. As a further measure, it is recommended that a 'hedgehog highway' is implemented across proposed gardens whereby a small hole measuring 13x13cm is cut into the base of garden fences to provide an escape route to prevent hedgehogs becoming trapped in gardens.

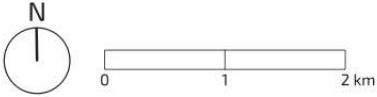
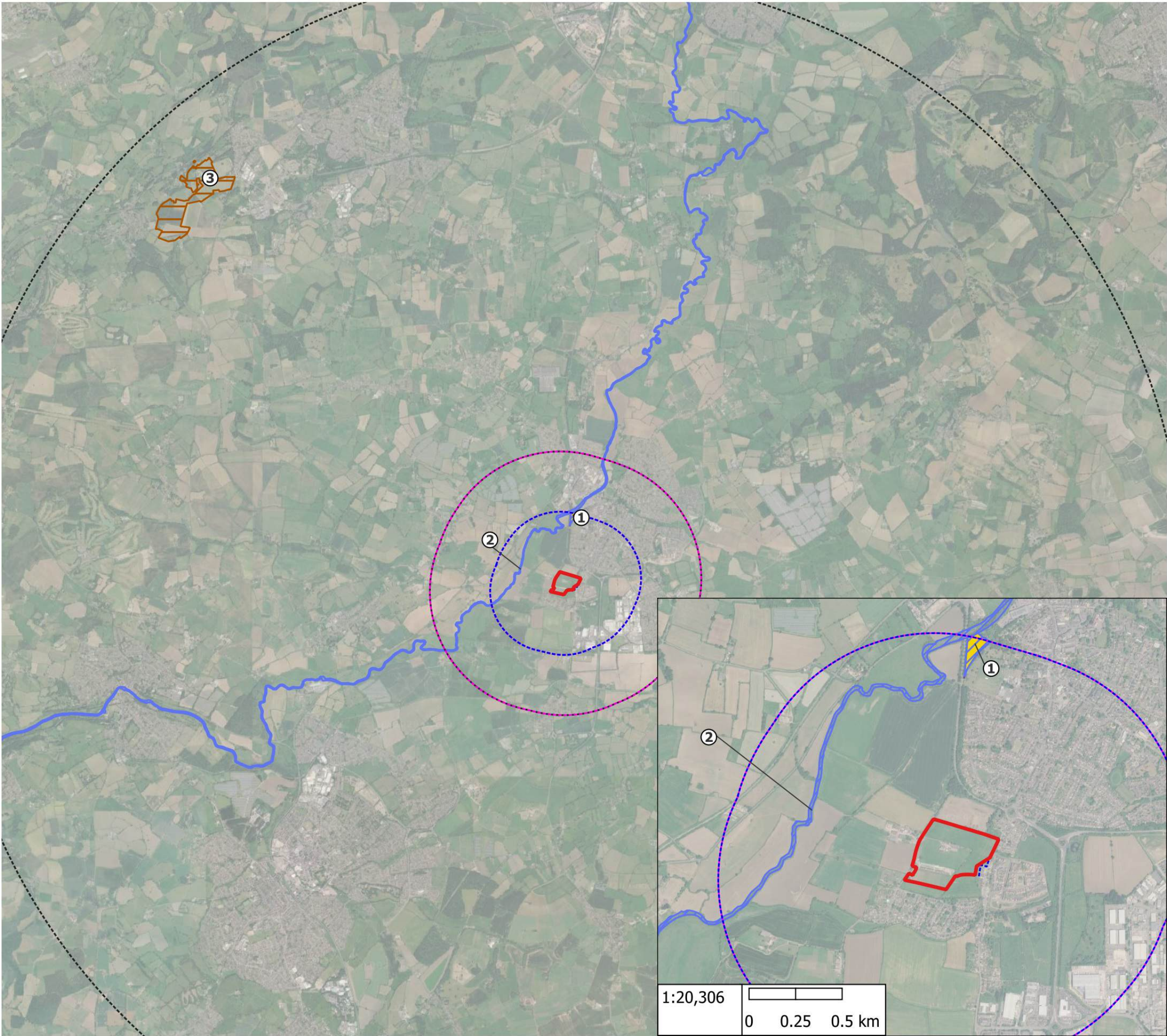
7.0 CONCLUSION

- 7.1 The suite of ecology surveys identified a range of important ecological features on Site and within its zone of influence. The impacts on these were assessed against the proposals for demolition and clearance of all existing buildings and structures on the site and the development of up to 225 dwellings, with access, public open space and landscape buffers.
- 7.2 The assessment has demonstrated that, in the absence of mitigation, the proposals have the potential to result in a Minor Adverse Effect at a Local Scale on the local bat population through the loss of a confirmed roost and disturbance to commuting habitat. Potential effects on other Important Ecological Features would be localised and would not be significant. Following the implementation of the mitigation measures set out within this Ecological Impact Assessment, no Significant Ecological Effects are predicted.
- 7.3 This Ecological Impact Assessment has considered the potential effects of the proposed outline residential development at Townsend Farm, Melksham, on habitats, designated sites and protected and notable species. The assessment has been informed by a desktop study, a UKHab survey and a suite of protected species surveys undertaken in 2026, together with the principles of the indicative masterplan.
- 7.4 The Site is dominated by species-poor agricultural habitats of relatively low ecological value but supports a network of hedgerows, mature trees and associated habitats that provide ecological connectivity and habitat for a range of protected and notable species, including bats, badgers, breeding birds and potentially hazel dormouse and reptiles. These features have informed the design of the development from an early stage, enabling the retention of the majority of the site's important ecological infrastructure.
- 7.5 The proposals incorporate significant areas of green infrastructure, including retained and enhanced hedgerows, native tree and scrub planting, species-rich grassland and SuDS features. These measures will maintain ecological connectivity across the Site, provide replacement habitat where losses are unavoidable and deliver long-term ecological enhancements.
- 7.6 Where necessary, additional mitigation measures will be secured through a CEMP, HMMP, LEMP and, where required, protected species licensing. These measures will ensure that protected species are safeguarded throughout construction and that newly created habitats are appropriately managed to maximise their ecological value.
- 7.7 Subject to the implementation of the mitigation, compensation and enhancement measures set out within this report, the proposed development is not predicted to result in any significant adverse residual effects on Important Ecological Features. The proposals will comply with relevant wildlife legislation and national and local planning policy relating to biodiversity.

FPCR Environment and Design Ltd

Registered Office: Lockington Hall, Lockington, Derby DE74 2RH
Company No. 07128076. [T] 01509 672772 [E] mail@fpcr.co.uk [W] www.fpcr.co.uk

This report is the property of FPCR Environment and Design Ltd and is issued on the condition it is not reproduced, retained or disclosed to any unauthorised person, either wholly or in part without the written consent of FPCR Environment and Design Ltd. Ordnance Survey material is used with permission of The Controller of HMSO, Crown copyright 100019980.



Key

-  Site Boundary
-  1km Buffer
-  2km Buffer
-  10km Buffer

Non-Statutory Designated Sites

-  Local Wildlife Site
-  WWT Reserve

Statutory Designated Sites

-  SAC

Ref.	Name	Designation
1	Conigre Mead WWT Reserve	Local Wildlife Site WWT Reserve
2	Bristol Avon River	Local Wildlife Site
3	Bath & Bradford on Avon Bats	SAC

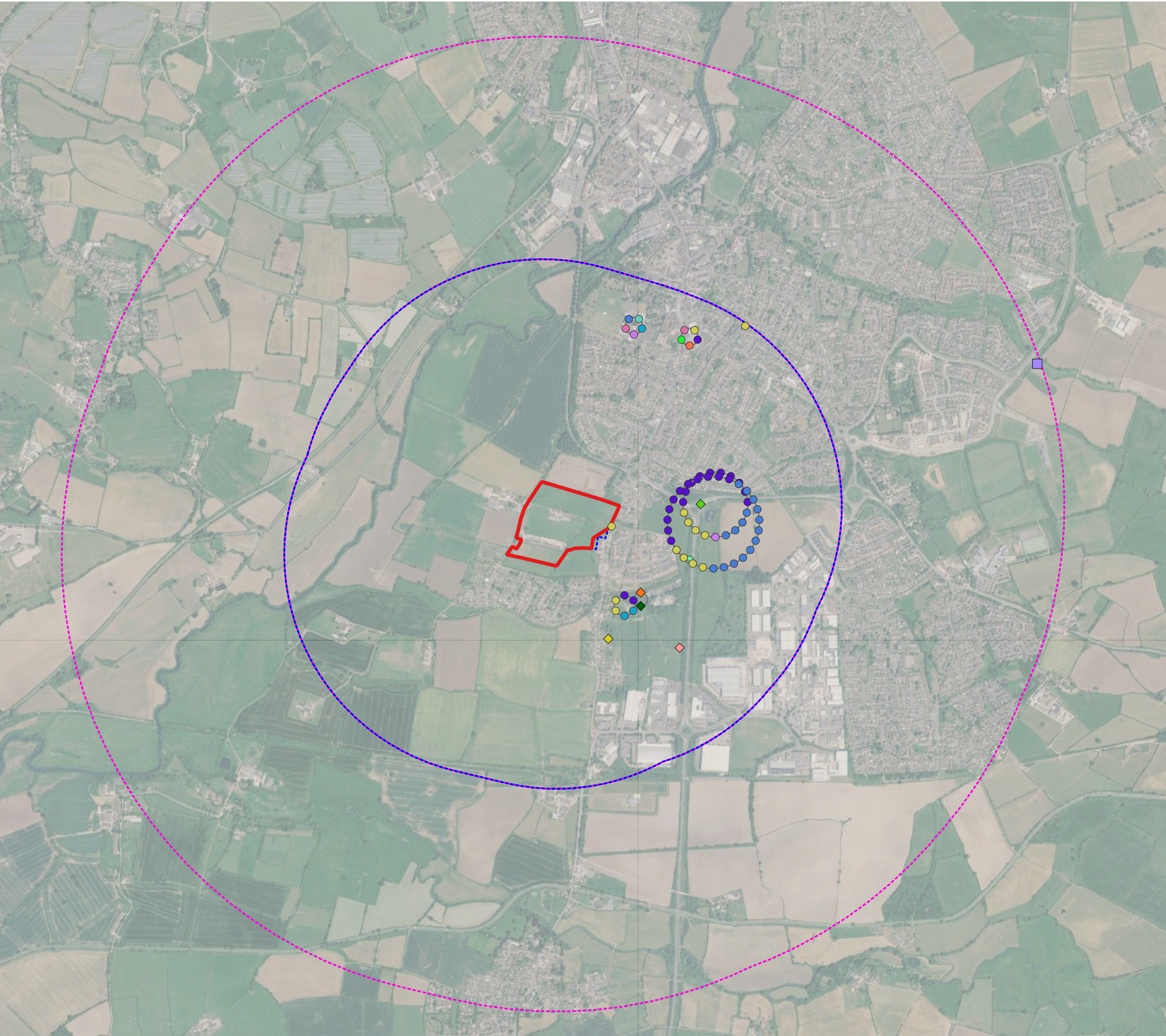
drawn date 29/07/26
drwn/chkd PAE/MEL

client
Bellway Homes Ltd

project
**Land at Townsend Farm,
Melksham**

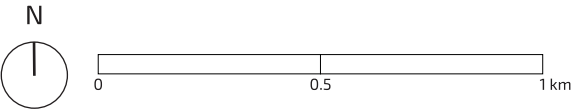
title
**SITE LOCATION AND CONSULTATION
RESULTS PLAN - DESIGNATED SITES**

number
FIGURE 1



This drawing is the property of FPCR Environment and Design Ltd and is issued on the condition it is not reproduced, retained or disclosed to any unauthorised person, either wholly or in part without written consent of FPCR Environment and Design Ltd

Ordnance Survey material - Crown Copyright. All rights reserved. Licence Number: 100019980 (Centremapslive.com)



Key

Site Boundary

Buffers

1km Buffer
2km Buffer

Bats

- Brown Long-eared Bat
- Common Pipistrelle
- Daubenton's Bat
- Lesser Horseshoe Bat
- Myotis Bat species
- Natterer's Bat
- Noctule
- Serotine
- Soprano Pipistrelle
- Whiskered Bat

Other Mammals

Water Vole

Reptiles and Amphibians

- Common Frog
- Common Toad
- Grass Snake
- Great Crested Newt
- Slow-worm
- Water Vole

date 29/07/26 drwn/chkd PAE/MEL

client Bellway Homes Ltd

project Land at Townsend Farm, Melksham

title SITE LOCATION AND CONSULTATION RESULTS PLAN - SPECIES RECORDS scale 1:1 @ A3

number FIGURE 2a rev -



This drawing is the property of FPCR Environment and Design Ltd and is issued on the condition it is not reproduced, retained or disclosed to any unauthorised person, either wholly or in part without written consent of FPCR Environment and Design Ltd



Key

- Site Boundary
- 1km Buffer
- 2km Buffer

Bird Species Records

- | | |
|----------------------------|----------------------------|
| ▲ Barn Owl | ▲ Lesser Black-backed Gull |
| ▲ Black Redstart | ▲ Linnet |
| ▲ Black-headed Gull | ▲ Mallard |
| ▲ Bullfinch | ▲ Meadow Pipit |
| ▲ Cetti's Warbler | ▲ Merlin |
| ▲ Common Gull | ▲ Mistle Thrush |
| ▲ Common Sandpiper | ▲ Moorhen |
| ▲ Common Tern | ▲ Peregrine |
| ▲ Crane | ▲ Pintail |
| ▲ Cuckoo | ▲ Red Kite |
| ▲ Dunnock | ▲ Redwing |
| ▲ Fieldfare | ▲ Reed Bunting |
| ▲ Firecrest | ▲ Rook |
| ▲ Grasshopper Warbler | ▲ Sedge Warbler |
| ▲ Great White Egret | ▲ Shoveler |
| ▲ Greenfinch | ▲ Skylark |
| ▲ Grey Wagtail | ▲ Snipe |
| ▲ Greylag Goose | ▲ Song Thrush |
| ▲ Hen Harrier | ▲ Sparrowhawk |
| ▲ Herring Gull | ▲ Spotted Flycatcher |
| ▲ Hobby | ▲ Starling |
| ▲ House Martin | ▲ Stock Dove |
| ▲ House Sparrow | ▲ Swift |
| ▲ Kestrel | ▲ Tawny Owl |
| ▲ Kingfisher | ▲ Teal |
| ▲ Lapwing | ▲ Wheatear |
| ▲ Lesser Black-backed Gull | ▲ Whitethroat |
| | ▲ Wigeon |
| | ▲ Willow Warbler |
| | ▲ Woodcock |
| | ▲ Woodpigeon |
| | ▲ Wren |
| | ▲ Yellowhammer |

date: 29/07/26
drwn/chkd: PAE/MEL

client
Bellway Homes Ltd

project
Land at Townsend Farm,
Melksham

title
SITE LOCATION AND CONSULTATION
RESULTS PLAN - BIRD SPECIES RECORDS

number
FIGURE 2b

scale
1:1 @ A3
rev
-



North

0

50

100 m

Redline Boundary

Baseline Habitats

Bramble scrub

Developed land; sealed surface

Mixed scrub

Modified grassland

Other neutral grassland

Ruderal/Ephemeral

Tall forbs

Bare ground

Baseline Hedgerow

Line of trees

Native hedgerow

Native hedgerow with trees

Species-rich native hedgerow

Baseline Individual Trees

Existing medium rural tree

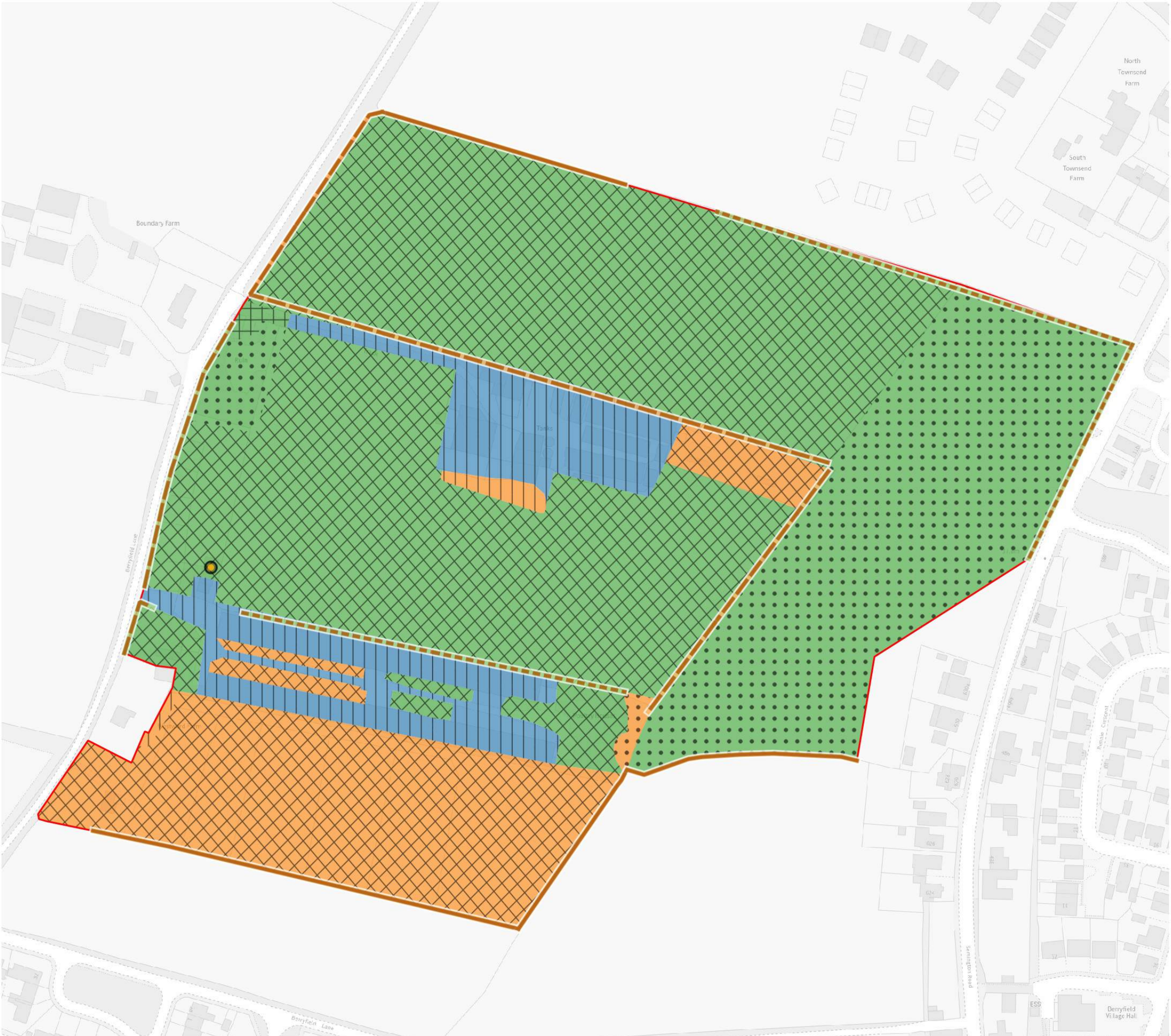
date	29/07/26	drwn/chkd	DS / JS
client	Bellway Homes Ltd		
project	Land at Townsend Farm, Melksham		
title	BASELINE HABITAT PLAN	scale	1:1,750 @ A3
number	FIGURE 3	rev	-

This drawing is the property of FPCR Environment and Design Ltd and is issued on the condition it is not reproduced, retained or disclosed to any unauthorised person, either wholly or in part without written consent of FPCR Environment and Design Ltd
Contains OS Data © Crown copyright [and database rights] 2026.
UKHab Materials: © UKHAB LTD. No onward licence implied or provided. All rights reserved <https://ukhab.org/commercial-eula/>

L:\13700\13770\GIS\E - BNG\Statutory Metric - May 2026 v1.1\Net Gain Habitat Mapping.qgs
t: 01509 672772 e: mail@fpcr.co.uk w: www.fpcr.co.uk

FPCR

environment & design



N

0

50

100 m

Redline Boundary

Baseline Habitat Condition

Good

Moderate

Poor

N/A - Other

Condition Assessment N/A

Baseline Habitat Distinctiveness

Medium

Low

V.Low

Baseline Hedgerow Condition

Good

Moderate

Poor

Baseline Hedgerow Distinctiveness

Medium

Low

Baseline Individual tree Condition

Good

Baseline Individual tree Distinctiveness

Medium

date	29/07/26	drwn/chkd	DS / JS
client	Bellway Homes Ltd		
project	Land at Townsend Farm, Melksham		
title	BASELINE HABITAT CONDITION AND DISTINCTIVENESS PLAN	scale	1:1,750 @ A3
number	FIGURE 4	rev	-

This drawing is the property of FPCR Environment and Design Ltd and is issued on the condition it is not reproduced, retained or disclosed to any unauthorised person, either wholly or in part without written consent of FPCR Environment and Design Ltd
Contains OS Data © Crown copyright [and database rights] 2026.

L:\13700\13770\GIS\E - BNG\Statutory Metric - May 2026 v1.1\Net Gain Habitat Mapping.qgs

t: 01509 672772 e: mail@fpcr.co.uk w: www.fpcr.co.uk

FPCR

environment & design

APPENDIX A: RELEVANT LEGISLATION, POLICY AND GUIDANCE

The Conservation of Habitats and Species Regulations (CHSR) 2017 (as amended)

- 1.1 The CHSR ratifies into UK law the "Habitats Directive" (92/43/EEC) and the "Birds Directive" (79/409/EEC).

European Protected Sites

- 1.2 The CHSR places a duty on the Secretary of State to propose a list of sites which are important for species listed in Annex I and II of the Habitats Directive respectively to the European Commission. Once the Commission and EU Member States have agreed that the sites submitted are worthy of designation, they are identified as Sites of Community Importance (SCIs). The EU Member States must then designate these sites as Special Areas of Conservation (SACs) within six years.
- 1.3 The CHSR requires the compilation and maintenance of a register of European sites to include SACs as well as Special Protection Areas (SPAs) designated for birds. The SACs and SPAs under the CHSR are referred to as national site networks, Ramsar sites are of international importance and do not form part of the national site networks; but boundaries might overlap SAC and SPA designations.

European Protected Species

- 1.4 The CHSR includes a list of animals and plant species taken from the Annex IV of the Habitats Directive that have a natural range in Great Britain. These are collectively known as European Protected Species (EPS) and are listed in *Table 1*. The regulations make it an offence to deliberately capture, kill, disturb, take or destroy eggs of, or damage or destroy a breeding or resting place of animals listed in Schedule 2 of the Regulations, and to pick, collect, cut, uproot or destroy wild plants listed in Schedule 5 of the Regulations. They also protect these species alive or dead and parts thereof from various forms of possession and trade.
- 1.5 These actions may be made lawful in certain circumstances through the granting of licences by the appropriate authority (Natural England). Licences must only be granted after the appropriate authority is satisfied that no satisfactory alternatives are available. In most circumstances, licences are only applied for and granted following full planning permission.
- 1.6 In determining whether or not to grant a licence, Natural England must apply the requirements of the CHSR and, in particular, the three derogation tests:
- Test 1: A licence can be granted for the purposes of "preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment".
 - Test 2: The appropriate authority shall not grant a licence unless they are satisfied "that there is no satisfactory alternative".
 - Test 3: The appropriate authority shall not grant a licence unless they are satisfied "that the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range."

Table 1: The Habitats Regulations Schedule 2 and Schedule 5 species

	Common Name	Scientific Name
Schedule 2 – European Protected Animal Species	Horseshoe bats – all species	<i>Rhinolophidae</i>
	Bats – all species	<i>Vespertilionidae</i>
	Large blue butterfly	<i>Maculinea arion</i>
	Wild cat	<i>Felis silvestris</i>
	Dolphins, porpoises & whales – all species	<i>Cetacea</i>
	Hazel dormouse	<i>Muscardinus avellanarius</i>
	Pool frog	<i>Rana lessonae</i>
	Sand lizard	<i>Lacerta agilis</i>
	Fisher's estuarine moth	<i>Gortyna borelii lunata</i>
	Great crested newt	<i>Triturus cristatus</i>
	Otter	<i>Lutra lutra</i>
	Lesser Whirlpool Ram's-horn snail	<i>Anisus vorticulus</i>
	Smooth snake	<i>Coronella austriaca</i>
	Sturgeon	<i>Acipenser sturio</i>
	Natterjack toad	<i>Bufo calamita</i>
	Marine turtles	Caretta caretta Chelonia mydas Lepidochelys kempii Eretmochelys imbricata Dermochelys coriacea
Schedule 5 – European Protected Plant Species	Shore dock	<i>Rumex rupestris</i>
	Killarney fern	<i>Trichomanes speciosum</i>
	Early gentian	<i>Gentianella anglica</i>
	Lady's-slipper	<i>Cypripedium calceolus</i>
	Creeping marshwort	<i>Apium repens</i>
	Slender naiad	<i>Najas flexilis</i>
	Fen orchid	<i>Liparis loeselii</i>
	Floating-leaved water plantain	<i>Luronium natans</i>
	Yellow marsh saxifrage	<i>Saxifraga hirculus</i>

Wildlife and Countryside Act (WCA) 1981 (as amended)

- 1.7 The WCA 1981 (as amended) is the principal legislation providing protection for wildlife in the UK. It prescribes legislation for wild birds, other animals, wild plants and non-native species. In addition, it provides for the designation of Sites of Special Scientific Interest (SSSI) in England.

Wild birds

- 1.8 The WCA as amended by Schedule 12 of the Countryside and Rights of Way Act 2000 makes it an offence (with exception to species listed in Schedule 2) to intentionally or recklessly:

- kill, injure, or take any wild bird;
- take, damage or destroy the nest of any wild bird while that nest is in use or being built (also [take, damage or destroy the nest of a wild bird included in Schedule ZA1] under the Natural Environment and Rural Communities Act 2006); or
- take or destroy an egg of any wild bird.

- 1.9 For birds listed on Schedule 1 of the WCA, protection extends to offences relating to the intentional or reckless disturbance of these birds while at their nests or their dependent young.

Other animals

- 1.10 The WCA (as amended) makes it an offence to (subject to exceptions) intentionally or recklessly kill, injure or take wild animals listed on Schedule 5 of the Act. For some species, the protection extends to interference with places used for shelter or protection, or disturbing animals occupying or obstructing access to such places. These species are regarded as “fully protected” and as well as the EPS species listed above include the mammal species water vole *Arvicola terrestris*, pine marten *Martes martes* and red squirrel *Sciurus vulgaris* as well as selected others from a range of species groups including, fish, butterflies, hemipteran bugs, beetles, crickets, dragonflies, moths, spiders, crustaceans, sea-mats, molluscs, Annelid worms and sea anemones (and allies).
- 1.11 There are seven species on Schedule 5 of the Act that not fully protected but are still protected against killing and injuring these include the common reptile species slow worm *Anguis fragilis*, viviparous lizard *Lacerta vivipara*, grass snake *Natrix natrix* and adder *Vipera berus*.
- 1.12 The Act prohibits certain methods of killing, injuring, or taking wild animals, and numerous species are protected against sale only as well as other variations for example Atlantic stream (white-clawed) crayfish *Austropotamobius pallipes* are protected against taking and sale.

Vascular plants, bryophytes, lichens and fungi

- 1.13 With regards to native flora the Act makes it an offence to (subject to exceptions) intentionally or recklessly pick, uproot or destroy any wild plant listed in Schedule 8. Similarly, the Act prevents the sale, offer or expose for sale, or possess (for the purposes of trade), any live or dead wild plant included in Schedule 8, or any part of, or anything derived from, such a plant.

Non-native species

- 1.14 The Act contains measures for preventing the establishment of non-native species which may be detrimental to native wildlife, prohibiting the release of animals and planting of plants listed in Schedule 9 in England and Wales.

Sites of Special Scientific Interest

- 1.15 The Act provides for the notification and confirmation of Sites of Special Scientific Interest (SSSIs). These sites can be identified for their flora, fauna, geological or physiological interest. In England, the power to confirm an SSSI lies with Natural England.
- 1.16 Laws protecting areas designated as SSSIs are described in Sections 28 to 33 of Part 2 of the Wildlife and Countryside Act 1981 (as amended). SSSIs are the principle statutory designation of sites in the UK and offences are enforced through Natural England. Offences include the following:

SSSI owners and occupiers

- carrying out, causing or allowing operations likely to damage an SSSI without Natural England consent.
- failing to keep to a management notice.
- failing to let us know about a change in ownership or occupation of land in an SSSI.

Public bodies

- carrying out or authorising operations likely to damage an SSSI without meeting the requirements to notify Natural England.

- failing to minimise any damage to an SSSI and if there is any damage, failing to restore it to its former state so far as is reasonably practical and possible.

Any person

- intentionally or recklessly damaging, destroying or disturbing any of the habitats or features of an SSSI.
- intentionally or recklessly damaging, destroying, obscuring or taking down a site notice put up on land within an SSSI.
- preventing a Natural England officer lawfully accessing an SSSI.

Environment Act 2021

- 1.17 The act was passed on 10th November 2021 and covers a range of environmental protections and enhancements. It is enforced by an independent Office for Environmental Protection (OEP). In relation to nature and biodiversity, the act will deliver:

- Strengthened biodiversity duty
- A requirement for developments to deliver at least 10% biodiversity net gain
- Local Nature Recovery Strategies
- Protected Site Strategies and Species Conservation Strategies
- Conservation Covenants
- Strengthened woodland protection enforcement measures

Protection of Badgers Act 1992

- 1.18 Badgers and their setts are protected under the Protection of Badgers Act 1992. This act is based on the need to protect badgers from persecution by baiting and deliberate harm or injury. The act makes it an offence to:

- intentionally capture, kill or injure a badger;
- damage, destroy or block access to their setts;
- disturb badgers in setts;
- treat a badger cruelly;
- deliberately send or intentionally allow a dog into a sett; and
- bait or dig for badgers.

- 1.19 A sett is defined as: *“Any structure or place that displays signs indicating current use by a badger”*.

Natural Environmental and Rural Communities (NERC) Act 2006

- 1.20 Section 40 of the NERC Act 2006 imposes a duty on every public authority to conserve biodiversity in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity. Conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat.

- 1.21 Section 41 (S41) of the NERC Act 2006 requires the Secretary of State to publish a list of habitats and species that are of principal importance for the conservation of biodiversity in England. The list (including 56 habitats and 943 species) has been drawn up in consultation with Natural England and draws upon the UK BAP List of Priority Species and Habitats. The S41 list is used to guide decision-makers such as public bodies, including local and regional authorities, in implementing their duty under section 40 of the Natural Environment and Rural Communities Act 2006.

National Planning Policy Framework (NPPF) 2024

- 1.22 The National Planning Policy Framework (NPPF) sets out the Government's planning policy for England. As such, the NPPF must be a material consideration for local authorities when considering planning decisions. The following relate to ecology/biodiversity:

Policy 15 – Conserving and enhancing the natural environment

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

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
- c) maintaining the character of the undeveloped coast, while improving public access to it where possible;*
- 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.*

188. Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

189. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife

and cultural heritage are also important considerations in these areas and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise impacts on the designated areas.

190. When considering applications for development within National Parks, the Broads and National Landscapes, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and*
- c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.*

191. Within areas defined as Heritage Coast (and that do not already fall within one of the designated areas mentioned in paragraph 189), planning policies and decisions should be consistent with the special character of the area and the importance of its conservation. Major development within a Heritage Coast is unlikely to be appropriate, unless it is compatible with its special character.

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

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

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

- a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*
- b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;*
- c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and*

- d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.*

194. The following should be given the same protection as habitats sites:

- a) potential Special Protection Areas and possible Special Areas of Conservation;*
- b) listed or proposed Ramsar sites; and*
- c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Area of Conservation, and listed or proposed Ramsar sites.*

195. The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.

APPENDIX B: SURVEY PERSONNEL

Surveyor Details				
Initials	Name and Position	Qualifications and Memberships	Class Licences	Years' Experience
Katie	Katie Oliver Associate	MSc, ACIEEM	Dormouse, GCN	7
DJC	Dale Cooper Ecology Associate	BSc (hons), MSc FISC Level 4 Botany		15
SB	Sam Burhouse Ecologist	BSc (Hons), MSc	-	2
IM	Isabelle Mears Ecologist	BSc (Hons), MSc	-	2
KP	Kemp Pidgeon Ecologist	-	-	2
GA	Georgia Arthurs Assistant Ecologist	BSc (Hons)	-	1
CB	Catherine Beale Assistant Ecologist	BSc (Hons), MSc	-	1
GS	Georgina Salmon Assistant Ecologist	-	-	1
SG	Stephanie Golding Assistant Ecologist	FdSc	-	2
ET	Eleanor Tucker Assistant Ecologist	BSc (Hons)	-	1

Survey Details		
Survey	Date(s)	Surveyors
Habitat	27.05.2027	DJC
Badger	04.03.2026	IM
Bats – Habitat suitability assessment	27.05.2026	DJC
Bats - Building Preliminary Roost Assessment	10.06.2026 27.07.2026	KO, SB, CB
Bats - Water tower emergence	08.06.2026	KP, SB
Bats - Ground level tree assessment	09.04.2026	DJC
Bats - Seasonal night-time bat walkover	01.04.2026 05.05.2026 01.06.2026	LS, SG, ET, CB
Bats - Monthly static detector surveys and Static detectors in buildings	December 2025 April 2026 May 2026 June 2026	LS, SG, GS, DJC, GA, SB
Breeding Bird Scoping Survey	11.05.2027	DJC
Hazel dormouse - Habitat suitability assessment	27.05.2026	DJC

Survey Details		
Survey	Date(s)	Surveyors
Hazel dormouse – Footprint tunnel survey	08.06.2026	DJC, SB
Reptiles	21.05.2026 01.06.2026 05.06.2026 09.06.2026 17.06.2026	DJC, CB, GA, SB, OG, KP, GS

APPENDIX C: BOTANICAL SPECIES LIST

DAFOR SCALE: DOMINANT, ABUNDANT, FREQUENT, OCCASIONAL, RARE

Species		Modified Grassland	Other Neutral Grassland	Ruderal/ Ephemeral	Hedge & Trees
Alexanders	<i>Smyrnium olusatrum</i>		O		
Annual meadow grass	<i>Poa annua</i>	O		O	
Ash	<i>Fraxinus excelsior</i>				F
Barren Brome	<i>Anisantha sterilis</i>		LD	LD	
Birds-foot trefoil	<i>Lotus corniculatus</i>		R		
Blackthorn	<i>Prunus spinosa</i>				A
Bramble	<i>Rubus fruticosus agg.</i>		F	O	D
Bristly Oxtongue	<i>Helminthotheca echioides</i>			R	
Broad leaved dock	<i>Rumex obtusifolius</i>	R	F	O	
Buddleia	<i>Buddleja davidii</i>		LF		
Burdock	<i>Arctium minus</i>		LF		
Caper spurge	<i>Euphorbia lathyris</i>		R		
Cleavers	<i>Galium aparine</i>		LA	LD	
Cock's foot	<i>Dactylis glomerata</i>	O	F	O	
Common cat's ear	<i>Hypochaeris radicata</i>			R	
Common couch	<i>Elymus repens</i>			R	
Common mouse ear	<i>Cerastium fontanum</i>		O	O	
Common vetch	<i>Vicia sativa</i>			O	
Cow parsley	<i>Anthriscus sylvestris</i>		LA	O	
Crab apple	<i>Malus sylvestris</i>				R
Crack willow	<i>Salix fragilis</i>				R
Creeping bent	<i>Agrostis stolonifera</i>	F		LA	
Creeping buttercup	<i>Ranunculus repens</i>	F		LA	
Creeping cinquefoil	<i>Potentilla reptans</i>		LA	R	
Creeping thistle	<i>Cirsium arvense</i>	O	LA	LA	
Curled Dock	<i>Rumex crispus</i>	R			
Cut-leaved cranesbill	<i>Geranium dissectum</i>	O	O-A	O	
Cypress	<i>Cupressus sp.</i>				R
Dog rose	<i>Rosa canina</i>				O
Dogwood	<i>Cornus sanguinea</i>				O
Eared willow	<i>Salix aurita</i>				O
Elder	<i>Sambucus nigra</i>				F
English elm	<i>Ulmus procera</i>				F
English Oak	<i>Quercus robur</i>				R
English stonecrop	<i>Sedum anglicum</i>			R	
False oat grass	<i>Arrhenatherum elatius</i>	O	LA	A	
Field Bindweed	<i>Convolvulus arvensis</i>			LA	
Field maple	<i>Acer campestre</i>				F
Field poppy	<i>Papaver rhoeas</i>		F		
Filed forget-me-knot	<i>Myosotis arvensis</i>			R	
Fox glove	<i>Digitalis purpurea</i>		O		
Goat willow	<i>Salix caprea</i>		O		R
Greater plantain	<i>Plantago major</i>			R	

Species		Modified Grassland	Other Neutral Grassland	Ruderal/Ephemeral	Hedge & Trees
Green alkanet	<i>Pentaglottis sempervirens</i>		O		
Ground ivy	<i>Glechoma hederacea</i>			R	
Hawthorn	<i>Crataegus monogyna</i>				D
Hazel	<i>Corylus avellana</i>				O
Hedge bindweed	<i>Calystegia sepium</i>			R	
Hedgerow Cranesbill	<i>Geranium pyrenaicum</i>			R	
Hedge garlic	<i>Alliaria petiolata</i>		LF		
Hemlock	<i>Conium maculatum</i>		F		
Herb Robert	<i>Geranium robertianum</i>		O	R	
Hogweed	<i>Heracleum sphondylium</i>		LA	O	
Horse chestnut	<i>Aesculus hippocastanum</i>				LA
Horsetail sp.	<i>Equisetum spp.</i>			R	
Meadow buttercup	<i>Ranunculus acris</i>	LF		A	
Meadow foxtail	<i>Alopecurus pratensis</i>	LA		O	
Musk mallow	<i>Malva moschata</i>		O		
Nettle	<i>Urtica dioica</i>		O-D	LO	
Nipplewort	<i>Lapsana communis</i>		O		
Orange ball tree	<i>Buddleja globosa</i>		O		
Perennial Ryegrass	<i>Lolium perenne</i>	D		F	
Prickly Lettice	<i>Lactuca serriola</i>		O		
Prickly sow thistle	<i>Sonchus asper</i>			r	
Ragwort	<i>Jacobaea vulgaris</i>		O	R	
Red campion	<i>Silene dioica</i>		LF		
Red clover	<i>Trifolium pratense</i>	R		R	
Red fescue	<i>Festuca rubra</i>	O		O	
Ribwort plantain	<i>Plantago lanceolata</i>		O		
Rough meadow grass	<i>Poa trivialis</i>	D	F	LA	
Scentless Mayweed	<i>Tripleurospermum inodorum</i>			R	
Sedge sp	<i>Carex spp.</i>			R	
Shepherd purse	<i>Capsella bursa-pastoris</i>			R	
Small-flowered cranesbill	<i>Geranium pusillum</i>			O	
smooth sow thistle	<i>Sonchus oleraceus</i>		F		
Soft brome	<i>Bromus hordeaceus</i>	O	LA	O	
Spear thistle	<i>Cirsium vulgare</i>		O		
Spear thistle	<i>Cirsium vulgare</i>	O		R	
Spear thistle	<i>Cirsium vulgare</i>				
Sun spurge	<i>Euphorbia helioscopia</i>			R	
Sweet vernal grass	<i>Anthoxanthum odoratum</i>	LF			
Sycamore	<i>Acer pseudoplatanus</i>				O
Teasel	<i>Dipsacus fullonum</i>		LA		
Taraxacum agg.	<i>Taraxacum agg.</i>		R		
wall barley	<i>Hordeum murinum</i>		LF		
White clover	<i>Trifolium repens</i>	LF	F	LA	
White deadnettle	<i>Lamium album</i>		R		
Wood avens	<i>Geum urbanum</i>			R	
Yorkshire fog	<i>Holcus lanatus</i>	D	F	F	

APPENDIX D: SITE PHOTOGRAPHS



Photo 1: Modified grassland and line of trees



Photo 2: Cattle grazed modified grassland



Disused Pig enclosure



Photo 4: Active storage area south compound



Photo 5: Storage area north compound



Photo 6: Southern field



Photo 7: Mown ruderal and static caravan



Photo 8: Ruderal habitat and scrub in storage area south compound.



Photo 9: Footpath and H3 in northwest field

APPENDIX E: PROTECTED AND NOTABLE SPECIES LIST

The data received from WSBRC during the desk study has been filtered to show only records from the last 10 years and presented in Table E1 below.

Table E1: Protected and Notable Species records from within 2km of the Site.

Species	Relevant Legislation	Distance from Site at Closest Point (km)	Description of Record(s) (as provided by WSBRC)
Bats			
Serotine	County, HabRegs2, HSD4, RLGB.VU, WCA5/9.4b, WCA5/9.4c	0.682376	2020: 1 Count; Bat site: not roost
Myotis Bat species	County, HabRegs2, HSD2p, HSD4, RLGB.CR, RLGB.DD, Sect.41, UKBAP, WCA5/9.4b, WCA5/9.4c	0.453069	2019: 1 Count; Bat site: Not roost
Daubenton's Bat	County, HabRegs2, HSD4, WCA5/9.4b, WCA5/9.4c	1.014049	2020: 1 Count; Bat site: Roost
Whiskered Bat	County, HabRegs2, HSD4, RLGB.DD, WCA5/9.4b, WCA5/9.4c	0.590761	2015: 1 Count; Bat site: Roost
Natterer's Bat	County, HabRegs2, HSD4, WCA5/9.4b, WCA5/9.4c	0.944984	2020: 1 Count; Bat site: Not roost
Noctule	County, HabRegs2, HSD4, Sect.41, UKBAP, WCA5/9.4b, WCA5/9.4c	0.661533	2020: 1 Count; Bat site: not roost
Pipistrelle Bat species	County, HabRegs2, HSD4, RLGB.Lr(NT), Sect.41, UKBAP, WCA5/9.4b, WCA5/9.4c	4.099274	2015: 1+ Count; Bat site: Roost
Common Pipistrelle	County, HabRegs2, HSD4, WCA5/9.4b, WCA5/9.4c	0.453069	2019: 13 Count; Bat site: Not roost
Soprano Pipistrelle	County, HabRegs2, HSD4, Sect.41, UKBAP, WCA5/9.4b, WCA5/9.4c	0.218607	2015: 2 Count; Bat site: Not Roost
Long-eared Bat species	County, HabRegs2, HSD4, RLGB.EN, Sect.41, UKBAP, WCA5/9.4b, WCA5/9.4c	1.614562	2020: 1+ Count; Bat site: Not Roost
Brown Long-eared Bat	County, HabRegs2, HSD4, Sect.41, UKBAP, WCA5/9.4b, WCA5/9.4c	0.944984	2020: 1 Count; Bat site: Not roost
Lesser Horseshoe Bat	County, HabRegs2, HSD2p, HSD4, Sect.41, UKBAP, WCA5/9.4b, WCA5/9.4c	1.014049	2021: 4 Count; Bat site: Roost
Amphibians			
Great Crested Newt	HabRegs2, HSD2p, HSD4, Sect.41, UKBAP, WCA5/9.4b, WCA5/9.4c	0.554459719	2019

Species	Relevant Legislation	Distance from Site at Closest Point (km)	Description of Record(s) (as provided by WSBRC)
Common Frog	HSD5, WCA5	0.624937312	2020
Common Toad	Sect.41, UKBAP, WCA5	0.763532567	2017
Reptiles			
Slow-worm	Sect.41, UKBAP, WCA5/9.1k/I	0.482367469	2019
Grass Snake	Sect.41, UKBAP, WCA5/9.1k/I	0.489571709	2019
Invertebrates			
Marsh Fritillary	HSD2p, RLGB.VU, Sect.41, UKBAP, WCA5/9.1k/I, 9.1t, 9.2, 9.4.a, 9.4b, 9.4c	0.460831816	2017
Other Mammals			
Otter	HabRegs2, HSD2p, HSD4, Sect.41, UKBAP, WCA5/9.4b, WCA5/9.4c	0.877520606	2020
Water Vole	RLGB.EN, Sect.41, UKBAP, WCA5/9.4.a, WCA5/9.4b, WCA5/9.4c	2.2493431	2020
Badger	Protection of Badgers Act 1992	0.033	2005
Birds			
Barn Owl	WCA1i	1.238814108	2017
Black Redstart	BAmb, RLGB.EN, RLGB.Lr(NT), WCA1i	1.014048681	2021
Black-headed Gull	BAmb, RLGB.VU	1.238814108	2020
Bullfinch	BAmb	0.37768081	2019
Cetti's Warbler	WCA1i	0.590760803	2023
Common Gull	BAmb	1.238814108	2020
Common Sandpiper	BAmb, RLGB.VU	1.238814108	2020
Common Tern	BAmb, BD1, RLGB.Lr(NT)	1.014048681	2021
Crane	BAmb, BD1, RLGB.VU	1.014048681	2021
Cuckoo	BRed, RLGB.VU, Sect.41, UKBAP	2.458465024	2022
Dunnock	BAmb	0.590760803	2022
Fieldfare	BRed, RLGB.CR(PE), WCA1i	1.238814108	2020

Species	Relevant Legislation	Distance from Site at Closest Point (km)	Description of Record(s) (as provided by WSBRC)
Firecrest	WCA1i	1.014048681	2015
Grasshopper Warbler	BRed, Sect.41, UKBAP	1.238814108	2017
Great White Egret	BAmb	1.014048681	2020
Green Sandpiper	BAmb, RLGB.EN, WCA1i	2.896836379	2021
Greenfinch	BRed, RLGB.EN	0.218607051	2020
Grey Wagtail	BAmb, RLGB.Lr(NT)	0.590760803	2022
Greylag Goose	BAmb, WCA1ii	1.014048681	2017
Hen Harrier	BD1, BRed, RLGB.VU, Sect.41, WCA1i	1.014048681	2021
Herring Gull	BRed, RLGB.EN	0.618599012	2021
Hobby	WCA1i	1.238814108	2020
Hobby	WCA1i	2.896836379	2019
House Martin	BRed, RLGB.VU	0.624937312	2020
House Sparrow	BRed, Sect.41, UKBAP	0.251731412	2018
Kestrel	BAmb, RLGB.VU	0.624937312	2020
Kingfisher	BD1, WCA1i	0.590760803	2022
Lapwing	BRed, RLGB.EN, RLGB.VU, Sect.41, UKBAP	0.489913547	2021
Lesser Black-backed Gull	BAmb	0.618599012	2021
Linnet	BRed, RLGB.Lr(NT)	1.238814108	2020
Mallard	BAmb, RLGB.Lr(NT)	0.618599012	2021
Meadow Pipit	BAmb	0.624937312	2020
Merlin	BD1, BRed, RLGB.EN, WCA1i	1.238814108	2020
Mistle Thrush	BRed, RLGB.VU	0.618599012	2021
Moorhen	BAmb, RLGB.VU	0.618599012	2021
Peregrine	BD1, WCA1i	0.624937312	2020
Pintail	BAmb, RLGB.CR, RLGB.EN, WCA1ii	1.238814108	2020
Red Kite	BD1, RLGLB.NT, WCA1i	0.618599012	2021

Species	Relevant Legislation	Distance from Site at Closest Point (km)	Description of Record(s) (as provided by WSBRC)
Reed Bunting	BAmb, Sect.41, UKBAP	0.590760803	2022
Rook	BAmb, RLGB.Lr(NT)	1.238814108	2020
Sedge Warbler	BAmb	0.590760803	2022
Shoveler	BAmb	1.238814108	2020
Skylark	BRed, Sect.41	1.238814108	2019
Snipe	BAmb, RLGB.Lr(NT)	0.624937312	2020
Song Thrush	BAmb	0.590760803	2023
Sparrowhawk	BAmb, RLGB.Lr(NT)	0.518983864	2019
Spotted Flycatcher	BRed, Sect.41, UKBAP	1.238814108	2020
Starling	BRed, RLGB.VU	0.618599012	2021
Stock Dove	BAmb	1.238814108	2020
Swift	BRed, RLGB.EN	0.460545956	2016
Tawny Owl	BAmb, RLGB.Lr(NT)	0.618599012	2021
Teal	BAmb	1.238814108	2020
Wheatear	BAmb	1.238814108	2020
Whitethroat	BAmb	0.590760803	2022
Wigeon	BAmb, RLGB.Lr(NT)	1.238814108	2020
Willow Warbler	BAmb	0.590760803	2022
Woodcock	BRed, RLGB.VU	1.29278501	2020
Woodpigeon	BAmb	0.590760803	2022
Wren	BAmb	0.371835499	2019
Yellowhammer	BRed, Sect.41, UKBAP	1.238814108	2020

CONFIDENTIAL

**THIS REPORT INCLUDES INFORMATION REGARDING THE LOCATION OF BADGER SETTS
AND SHOULD THEREFORE BE TREATED AS CONFIDENTIAL AND ONLY VIEWED BY BONA
FIDE ORGANISATIONS AND INDIVIDUALS**

FPCR | environment
& design



Appendix F: Badger Report

Client

Bellway Homes Ltd.

Project

**Land at Townsend Farm,
Melksham**

Date

July 2026

CONTENTS

1.0	NON-TECHNICAL SUMMARY	1
2.0	INTRODUCTION	1
3.0	LEGISLATION	2
4.0	METHODOLOGY	3
5.0	RESULTS	4
6.0	DISCUSSION	7
7.0	CONCLUSION	10

FIGURES

Figure F1: Badger Survey Results plan

APPENDICES

Appendix A: Relevant Policy and Legislation

Appendix B: Survey Personnel

Appendix E: Protected and Notable Species List

Rev	Issue Status	Prepared/Date	Approved/Date
-	Draft	IRM / 27.07.26	DC / 28.07.26

1.0 INTRODUCTION

- 1.1 The following Badger Report has been prepared by FPCR Environment and Design Ltd. on behalf of Bellway Homes Ltd, to support an outline planning application for the redevelopment of land located at Townsend Farm, Melksham (Central OS Grid Ref: ST 89923 62646) herein referred to as 'the Site'.
- 1.2 This Badger Report supports an Ecological Impact Assessment (EcIA) prepared for the outline planning application. The EcIA contains broader ecological information and assessment for the Site, the site context and proposals, and therefore, this report should be read in conjunction with it.
- 1.3 Due to the sensitive nature of this species and potential effects that could result from releasing badger evidence and sett locations, this document is **confidential** and should not be released into the public domain.

2.0 LEGISLATION

- 2.1 Badgers are protected under the Protection of Badgers Act 1992. This act is based on the need to protect badgers from baiting and deliberate harm or injury. The act makes it an offence to:
- wilfully kill, injure, take, possess or cruelly ill-treat a badger, or attempt to do so.
 - intentionally or recklessly interfere with a sett. Sett interference includes disturbing badgers whilst they are occupying a sett, as well as damaging or destroying a sett or obstructing access routes.
- 2.2 A sett is defined as: "Any structure or place that displays signs indicating current use by a badger". Work that disturbs badgers whilst occupying a sett is illegal without a licence; badgers may be disturbed by work near the sett even if there is no direct interference or damage to the sett. Generally, the types of activity requiring a licence include:
- using heavy machinery (generally tracked vehicles) within 30m of any entrance to an active sett.
 - using lighter machinery (generally wheeled vehicles), particularly for any digging operation, within 20m.
 - light work such as scrub clearance or hand digging within 10m.
- 2.3 However, guidance from Natural England recommends that the potential for such disturbance might not be as great as originally assumed due to the relatively high tolerance levels expressed by certain clans of badgers. Whether disturbance will be caused depends on the sett characteristics, current usage and proposed extent of works with the need for a licence being assessed on a site-by-site basis.
- 2.4 Licences only allow works to be carried out between July and November inclusive.

3.0 METHODOLOGY

Desk Study

- 3.1 Local badger records were requested from Wiltshire & Swindon Biological Records Centre within 1km of the site boundary.

Field Surveys

- 3.2 The Site was surveyed by experienced FPCR ecologists to determine the presence/likely absence of badgers within or close to its boundaries on 04th March 2026. Incidental findings were also recorded during other surveys on-site throughout 2026, including in April and July.
- 3.3 The standard methodology as recommended by Harris, Creswell and Jefferies (1989)¹ was followed, to complete a thorough visual search for evidence indicating the presence of badgers, both within the survey area and locally. Evidence sought included:
- Setts: including earth mounds, evidence of bedding and runways between setts.
 - Latrines: often located close to setts, at territory boundaries or adjacent to favoured foraging areas.
 - Prints and paths or trackways.
 - Hairs: caught on rough wood or fencing.
 - Other evidence: including snuffle holes, feeding and playing areas and scratching posts.
- 3.4 The identification of these signs on their own does not necessarily provide conclusive evidence of the presence of badgers. Several such signs need to be seen in conjunction before badgers can be confirmed as being present.
- 3.5 Where setts were found, their status and level of activity was noted. Sett status is broadly categorised as follows:
- Main sett – usually continuously used with many signs of activity, many holes and conspicuous spoil mounds.
 - Annexe sett – usually located close to a main sett and connected to it by well used paths. Annexes may not be continuously occupied.
 - Subsidiary sett – lesser used setts comprising a few holes and without associated well-used paths. Subsidiary setts are not continuously occupied.
 - Outlier sett – one or two holes without obvious paths. These are used sporadically.
- 3.6 Level of activity is described as:
- well used – clear of debris, trampled soil mounds and obviously active, with signs of activity such as presence of prints and dislodged guard hairs around the entrances.
 - partially used – some associated debris or plants at the entrance. Could be used with minimal excavation and usually with signs of activity within the vicinity.
 - disused – partially or completely blocked entrances.

¹ Cresswell, P., Harris, S. & Jefferies, D.J. (1989) Surveying Badgers. The Mammal Society Publication No.9 Mammal Society

Limitations

- 3.7 No significant illimitations identified.

4.0 RESULTS

Desktop Study

- 4.1 Consultation with Wiltshire & Swindon Biological Records Centre identified 6 Badgers records within 1km of the Site. The most recent being from 2020
- 4.2 Desk study records of badgers are summarised in *Table 1*, with details of other desk study records provided in the accompanying EcIA report.

Table 1: Records within 3km of Site

Record Type	Location	Date of Most Recent Record	Number of Records of this Type
Latrine	On site	2022	1
Sett	Approx. 915m N	2020	1
1 count	385m E	2019	1
1 count	2500m N	2018	1
1 count	740m NW	2015	1
1 count	210m N	2015	1

Field Survey

Habitat Suitability Assessment

- 4.3 The Site is dominated by pasture grassland that largely offers limited suitability for badgers due to its intensively managed nature. Though the field margins offer linear features inclusive of hedgerows with banks and bramble scrub offering habitat and commuting opportunities around the site boundary.
- 4.4 Particularly, the area of bramble scrub bank habitat along the southern central boundary provides suitable foraging and sett building habitat.

Setts

- 4.5 Four setts have been identified onsite. Descriptions of each sett are summarised in *Table X* below and their locations illustrated in *Figure F1*. Photographs of the setts S1, S2, S3 and S4 are provided below.

Table 2: Survey Results Summary – Sett Descriptions

Sett Reference	Sett Type	Sett Description
S1	Subsidiary	Located in the central site compartment by the southern boundary adjacent to the ditch that runs north to south throughout the site. The sett is built on a compacted spoil mound suggesting badger occupation and comprises of three entrances beneath dense bramble vegetation. Two holes show recent signs of excavation activity, and one hole is old and only partially used. Next to the sett was latrines and recent feeding evidence.
S2	Subsidiary	Located just north of S1 a single, disused hole, covered by discarded building materials and scrap metal. This sett shows no recent excavation, tracks or use and was covered with dense scrub at the time of survey.
S3	Subsidiary	Located just south of S1, this sett was located in a spoil mound and showed very recent signs of use. The sett comprised of two holes, one of which was partially used under a tree stump and the other had fresh spoil and excavations.
S4	Outlier	Located just off site the southeastern field parcel. A Collapsed hole in the centre of the field, with no signs of recent use or excavations.

**Photo 1 & 2: S1 and S2 subsidiary badger setts****Photo 3 & 4: S3 and S4 badger setts**

4.6 Other badger evidence on-site, as shown on Figure F1, included:

- Hair on the eastern boundary
- Footprints at the north of the site
- Snuffle holes in the areas around sett 1 and 3
- An active latrine next to the setts.
- Runs heading north from Sett 2 into the central field parcel.

5.0 DISCUSSION

- 5.1 The proposals will result in the loss of pasture environs and therefore some foraging opportunities on the Site. Though the area of trees directly adjacent and surrounding setts S1, S2 and S3 will be retained, providing habitat buffer to the development parcels to their west and the offsite separate application to the south, which houses S4. To the west of setts S1, S2, S3 and S4 will be a SuDs basin followed by residential access road and then developed land, therefore there will be some impacts to the badgers on site, however there is a significant buffer and the trees and hedgerow around the perimeter of the site will be retained providing commuting routes around the site.
- 5.2 The grassland field grassland field compartments that run along the northern and southern boundaries will be lost. The green space and grassland that runs throughout the central belt, from east to west will be enhanced with planting and all site perimeter hedgerows will be retained.
- 5.3 The Site will include a range of habitat creation measures as part of the proposed green infrastructure and includes a woodland creation along the eastern boundary of the Site. The drainage proposals for the Site will include the creation of a series of swale and SuDS features along the central belt.
- 5.4 The following section provides an assessment of the potential impacts of the proposals upon badgers.

Impact Assessment

Sett Disturbance

- 5.5 Setts S1, S2, S3 and S4 are located close to a proposed residential parcel to their west and are at risk of being damaged or destroyed during construction proposals, following reassessment at reserved matters the setts will be closed or temporary closed if it is deemed necessary.

Injury/Killing of Badgers

- 5.6 The implementation proposals have the potential to injure or kill badgers through the following impacts:
- Badgers being injured during groundworks within 30m of setts S1, S2, S3 and S4.
 - Badgers becoming trapped in open trenches or in exposed pipework during construction operations.
 - Road collision during construction operations and on proposed roads during the operational phase of the proposals.
- 5.7 In the absence of mitigation, the proposals have the potential to result in an offence under the Protection of Badgers Act 1992 through damage or disturbance to active badger setts, and possibly through injuring or killing individual badgers.

Habitat Loss

- 5.8 The proposals will result in the total loss of arable and pasture grassland habitats onsite. This will lead to an overall loss of foraging habitat available for badgers, albeit habitat of limited suitability. Given the limited suitability of these habitats, the limited evidence of their use by

badgers and their abundance in the wider landscape, this loss is not considered to represent a significant impact on the local badger population present onsite.

- 5.9 The proposals will provide extensive green infrastructure, including the creation of a new mosaic of species-rich grassland which will provide optimal foraging and sett building habitat for this species. These habitats will more than adequately compensate for the loss of cropland and pasture grassland foraging resources available onsite for badgers.

Mitigation

Sett Disturbance

- 5.10 Active setts can only be closed under a mitigation licence from Natural England. A derogation licence from Natural England will therefore be applied for if necessary following receipt of reserve matters planning permission and prior to any works commencing within 30m of setts S1 and S3 to allow for the closure of these setts under licence.
- 5.11 To inform a licence application, monitoring surveys for at least 21 consecutive days are required to confirm activity levels and sett type. The data must be from the same season as the licence application as badgers are highly mobile and sett activity levels can change in a very short period of time. The licence can only be applied for once planning permission has been granted and works under the licence can only take place between 1 July and 30 November.
- 5.12 An update survey and monitoring of impacted setts with trail cameras for a minimum period of 21 days is recommended before any works commence on Site. These surveys can be secured as a pre-commencement planning condition.
- 5.13 If the Site design changes, or new setts are created prior to works commencing resulting in any other active sett lying within 30m of any construction impacts, these works will also need to be covered by a mitigation licence.

Injury/Killing of Badgers

- 5.14 During the construction phase of the proposals, the following mitigation measures will be put in place to prevent injury or harm to badgers. These can be secured as part of a Construction and Environment Management Plan through an appropriately worded condition.
- Works will be restricted to daylight hours to prevent road collisions with machinery at nighttime.
 - All site personnel should be informed about the presence of badgers onsite and briefed on procedures to follow if they come across a badger whilst working.
 - Any excavations or trenches left overnight must be covered or have an escape route such as a shallow gradient at one or both ends or a substantial plank of wood. Inspections must occur each morning and evening to ensure that no badgers have become trapped.
 - Open pipework with a diameter of more than 120mm should be checked, then fully covered or capped at the end of the working day to prevent badgers from entering and becoming trapped.
 - The storage of topsoil or other “soft” building materials within the Site should be given careful consideration. Badgers will readily adopt such mounds and create setts which would then be afforded the same legal protection as established setts. To avoid the

adoption of such mounds, they should be subject to daily inspections before work commences or alternative measures put in place, such as being fenced off.

- Litter, tools and potentially dangerous materials onsite should be cleared at the end of the working day. Care should be taken that there are no sharp metal objects or pointed protrusions on the ground which could seriously injure a badger due to their poor eyesight.
- The storage of any chemicals should be contained in such a way that they cannot be accessed or knocked over by any roaming badgers.
- Care must still be taken that badgers are not disturbed by noise, vibrations or light caused by works, which can have a large area affect.

- 5.15 During the operational phase of the proposals, the proposed internal access roads have the potential to lead to an increase in road collisions with badgers. The internal roads are expected to receive only light and slow-moving traffic by residents accessing their homes, therefore this risk is limited. To further reduce the risk of collisions, traffic calming measures will be introduced on internal roads across the Site.

Enhancements

- 5.16 The greenspaces to be created onsite should include native species planting in order to increase provide new foraging opportunities for badgers and other species as well as increase the overall biodiversity onsite. Recommended species include native fruit trees and shrubs, such as crab apple, wild cherry, rowan, elder, hazel and blackthorn.

6.0 CONCLUSION

- 6.1 Survey has demonstrated that the Site supports badgers, with a total of four setts identified onsite.
- 6.2 The proposals will result in the loss of grassland habitats which has the potential to negatively impact badgers. The proposals also have the potential to breach legislation protecting this species through sett disturbance/destruction.
- 6.3 Following receipt of reserved matters planning permission and prior to works commencing within 30m of setts S1, S2 S3 and S4, a Natural England Derogation licence application will be submitted to facilitate the proposals, if required. The potential loss of these setts is not anticipated to result in a significant effect on the local badger population all setts comprise small subsidiary and outlier setts.
- 6.4 The proposals will be delivered following precautionary measures to avoid harming or killing badgers. This will include updated badgers surveys to inform any licence application.
- 6.5 The green infrastructure proposals include generous habitat creation and enhancement measures including species-rich grasslands, wetland features and scrub habitat. This mosaic of habitats proposed will provide optimal habitat for badgers.

FPCR Environment and Design Ltd

Registered Office: Lockington Hall, Lockington, Derby DE74 2RH
Company No. 07128076. [T] 01509 672772 [E] mail@fpcr.co.uk [W] www.fpcr.co.uk

This report is the property of FPCR Environment and Design Ltd and is issued on the condition it is not reproduced, retained or disclosed to any unauthorised person, either wholly or in part without the written consent of FPCR Environment and Design Ltd. Ordnance Survey material is used with permission of The Controller of HMSO, Crown copyright 100019980.



Site Boundary

Setts

- Subsidiary Settle
- Outlier Settle

Field Signs

- Footprint
- Hair
- Latrine
- Run
- Snuffle hole

CONFIDENTIAL:
NOT TO BE RELEASED INTO THE PUBLIC DOMAIN

drawn date 29/07/26
scale 1:1,700 @ A3

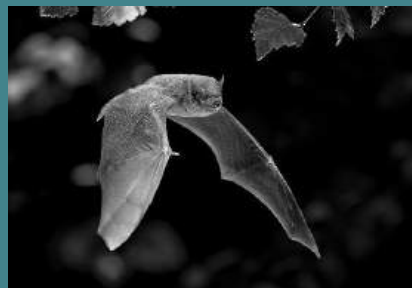
client
Bellway Homes Ltd.

project
Land at Townsend Farm,
Melksham

title
BADGER SURVEY RESULTS PLAN

number
FIGURE F1

FPCR | environment
& design



Appendix E – Bat Survey Report

Client

Bellway Homes Limited

Project

**Land at Townsend Farm,
Melksham**

Date

July 2026

CONTENTS

1.0	NON-TECHNICAL SUMMARY	ERROR! BOOKMARK NOT DEFINED.
2.0	INTRODUCTION	2
3.0	LEGISLATION	3
4.0	METHODOLOGY	4
5.0	RESULTS	8
6.0	DISCUSSION	ERROR! BOOKMARK NOT DEFINED.
7.0	CONCLUSIONS	ERROR! BOOKMARK NOT DEFINED.

TABLES

Table 1: Habitat Suitability Categories

Table 2: Bat Roost Potential Categories for Buildings

Table 3: Emergence Survey Date, Times and Weather Conditions

Table 4: GLTA Bat Roost Potential Categories, classification and survey requirements for bats in trees

Table 5: NBW Survey Timings and Weather Conditions

Table 6: Summary of Records

Table 7: Bat EPSML within 2km

Table 8: Summary of Nearby Planning Application Surveys

Table 9: Building Assessment Summary

Table 10: PRF Tree Summary

Table 11: NBW Survey Summary

Table 12: Static Survey Summary

FIGURES

Figure G1: Building Location Plan

Figure G2: Bat Emergence Survey Reference Plan

Figure G3: Bats in Trees Plan

Figure G4: Static Bat Detector Location Plan

Figure G5a: Bat Flightlines Plan - April

Figure G5b: Bat Transect Plan - April

Figure G6a: Bat Flightlines Plan - May

Figure G6b: Bat Transect Plan - May

Figure G7a: Bat Flightlines Plan - July

Figure G7b: Bat Transect Plan - July

Rev	Issue Status	Prepared/Date	Approved/Date
-	Final	KH / 28.07.2026	DJC / 28.07.2026

1.0 INTRODUCTION

- 1.1 The following report has been prepared by FPCR Environment & Design Ltd (FPCR) on behalf of Bellway Homes Limited. Its purpose is to present the results of bat surveys completed for a planning application for land at Townsend Farm, Melksham (Central OS Grid Ref: ST 89945 62637), herein referred to as 'the Site'.
- 1.2 This report supports an Ecological Impact Assessment (EcIA) prepared for the outline planning application. The EcIA report contains the Site context, proposals, broader ecological information and impact assessment for the Site. This report contains the methodology, results, plans and relevant technical information.

Site Proposals

- 1.3 *Outline application for up to 225 dwellings, with access from Semington Road, along with public open space and landscape buffers to incorporate existing rights of way and to accommodate the route of the proposed Melksham Link Canal (under separate application W/12/01080/FUL). Demolition and clearance of all existing buildings and structures on the site. All matters reserved other than vehicular access from Semington Road.*

2.0 LEGISLATION

- 2.1 All bats and their roosts are afforded legal protection under the Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife & Countryside Act 1981 (as amended). The purpose of the legislation is to maintain and restore protected species to a situation where their populations are favourable.
- 2.2 Under Regulation 43 of the Conservation of Habitats and Species Regulations 2017 (as amended) it is an offence to deliberately capture, injure or kill; deliberately disturb (including intentionally or recklessly) all UK bat species. This includes disturbance which impairs their ability to: breed and rear young; migrate; and hibernate; or affects their local distribution and abundance.
- 2.3 Under the Wildlife and Countryside Act 1981 (as amended) it is illegal to:
- Recklessly or intentionally kill, injure or take any wild animals included in Schedule 5;
 - Recklessly or intentionally obstruct access to any structure or place which any wild animal included in Schedule 5 uses for shelter or protection; and/or
 - Recklessly or intentionally disturb any such animal while it is occupying a structure or place which it uses for shelter or protection.
- 2.4 Foraging habitat and commuting routes used by bats are not protected as such but impacts that could prevent bats from using a resource or commuting to or from a valued roosting site may be considered as an indirect impact on a roost or a significant disturbance effect and would therefore also need to be avoided or prevented.
- 2.5 Several bat species are listed as species of principal importance for the purpose of conserving biodiversity under the Natural Environment and Rural Communities (NERC) Act 2006. These species are Barbastelle bat, Bechstein's bat, brown long-eared bat, greater horseshoe bat, lesser horseshoe bat, noctule and soprano pipistrelle.
- 2.6 Bats are recognised in the National Planning Policy Framework (NPPF) which advises that when determining planning applications, Local Planning Authorities should aim to conserve and enhance biodiversity by applying a set of principles including:
- *"If significant harm resulting from a development cannot be avoided..., adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*
 - *development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity."*

3.0 METHODOLOGY

Desk Study

3.1 A desk study was undertaken to collate existing information for the site and its surroundings in relation to bat species. This included a review of:

- Wiltshire and Swindon Biological Record Centre (WSBRC)
- Multi Agency Geographic Information for the Countryside (MAGIC - <https://magic.defra.gov.uk/MagicMap.html>)
- Aerial photographs from Google Earth (www.maps.google.co.uk)
- Wiltshire Council Planning Portal (<https://development.wiltshire.gov.uk/pr/s/>)

Habitat Assessment

3.2 The on-site habitats were assessed for their suitability for foraging and commuting bats. This was informed by the desk study and a habitat survey on 27th May 2026.

3.3 The Site was then categorised for its habitat suitability for foraging and commuting bats, which would inform the necessary survey effort. The habitat suitability was assessed using the latest best practice guidance¹ and professional judgement. The Site was then categorised as summarised below:

Table 1: Habitat Suitability Categories

Categories	Description	Further Surveys Required
None	No habitat features on site likely to be used by any commuting or foraging bats at any time of year.	None
Negligible	No obvious habitat features on site likely to be used as flightpaths or foraging bats. However, a small element of uncertainty remains to account for non-standard bat activity.	
Low	Habitat that could be used by a small number of bats as flightpaths or for foraging e.g. gappy hedgerows, unvegetated streams, lone tree.	Seasonal* (Spring - April/May, Summer – Jun/Jul/Aug, Autumn - Sept/Oct) night-time walkover surveys Seasonal* automated static detector monitoring
Moderate	Continuous habitat connected to the wider landscape that could be used by bats for commuting and foraging e.g. tree lines, water, grassland, scrub.	Seasonal* night-time walkover surveys Monthly (Apr-Sep) automated static detector monitoring
High	Continuous high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by commuting and foraging bats e.g. woodland, tree-lined watercourses, hedgerows, tree lines.	

Building Roost Assessment

3.4 18 buildings were assessed externally and internally, where access was possible and these were all assessed over 10th June and 27th July 2026 by suitably experienced bat ecologists from FPCR. Assessments were undertaken from ground level using torches and binoculars where appropriate. Buildings were inspected for Potential Roosting Features (PRFs) and evidence of

¹ Collins, J. (ed.) (2023) *Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition)*. The Bat Conservation Trust, London.

bat use in accordance with Bat Surveys for Professional Ecologists: Good Practice Guidelines (Bat Conservation Trust, 2023).

- 3.5 Factors including the type, condition and age of each structure, surrounding habitat, and the presence of suitable access points and roosting features were considered when assigning a bat roost potential category. Buildings were classified as having Confirmed, High, Moderate, Low or Negligible bat roost potential, with classifications informing the need for any further survey work or mitigation.
- 3.6 The buildings were then placed into roost potential categories as per current BCT guidance, as summarised in *Table 2*:

Table 2: Bat Roost Potential Categories for Buildings

Categories	Description	Further Surveys Required
Confirmed Roost	Evidence of roosting bats in the form of live/dead bats, droppings, urine staining, fur oil staining etc.	Three dusk emergence surveys at least three weeks apart between May-September and at least one between May-August. Where classic hibernation potential is present, hibernation surveys should be undertaken during the winter period.
High Potential	A structure with one or more PRFs that are obviously suitable for large numbers of bats on a more regular basis and/or longer duration due to their size, shelter, suitable conditions (height above ground, light levels, etc), and surrounding habitat. These structures have the potential to support high conservation status roosts such as those used for maternity or hibernation (classic site).	
Moderate Potential	A structure with one or more PRFs which 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 (with respect to roost type only; the assessments in this table are made irrespective of species conservation status, which is established after presence is confirmed).	Two dusk emergence surveys between May-September – at least one between May-August. Surveys undertaken at least 3 weeks apart. Precautionary method statement if works undertaken during winter (where non-classic hibernation potential exists).
Low Potential	A structure with one or more PRFs that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by large numbers of bats.	One dusk emergence survey between May-August (requirement based on professional judgement) Precautionary method statement if works undertaken during winter (where non-classic hibernation potential exists).
Negligible Potential	No obvious habitat features present that are likely to be used by roosting bats, but features may be present where a bat could theoretically roost, but it is considered very unlikely.	No further surveys required, but some vigilance may be required if the feature is impacted.
None	No habitat features on site that are likely to be used by bats at any time of year.	None
A <u>classic hibernation</u> site is considered to provide stable climatic conditions including temperature, humidity, and light levels, such as, but not limited to, underground structures which are subject to low levels of disturbance or specific-specific habitual requirements, e.g. brown long eared bats often use the same roost for maternity and hibernation. A <u>non-classic hibernation</u> site is a location which does not conform to the criteria for classic cites but could be used by individual hibernating bats. It is usually not possible to identify non-classic hibernation sites through survey work.		

Emergence Survey

- 3.7 One emergence survey was carried out on Site in June 2026 to cover all potential bat roost features identified on the water tower during the initial PRA walkover survey. Survey dates and weather conditions for these surveys are provided in the table below.

Table 3: Emergence Survey Date, Times and Weather Conditions

Date	Sunset	Survey Timings		Weather conditions	
		Start	End	Start	End
08/06/26	21:22	21:05	23:22	Dry, 0% cloud cover, BF wind 3, 12°C.	Dry, 0% cloud cover, BF wind 1, 10°C.

- 3.8 Four cameras were positioned to cover identified potential bat roost features on the water tower, with each camera manned except for one which was positioned to ensure all potential areas hidden by overgrowth or where observation was otherwise obscured were captured.
- 3.9 Surveyors were positioned on each corner of the building, with the stand-alone unmanned camera (number 3) positioned to face the south-eastern corner. During the survey, camera 4 was moved into the field south of the building to gain a clearer view of the building for the remainder of the survey. See the Bat Emergence Survey Reference Plan (*Figure G2*) for exact positions and camera directions.
- 3.10 Any notable activity patterns including emergences, commuting and/or foraging within the vicinity of the building were recorded.
- 3.11 Echo Meter Touch® (Wildlife Acoustics, Inc.) bat detectors were utilised in conjunction with the Echo Meter Touch® app. Where necessary, to confirm species identification Bat calls were analysed using the Kaleidoscope Viewer© (Wildlife Acoustics, Inc.) software package.
- 3.12 All surveyors were equipped with night vision aids (NVA's) to enhance visibility of the survey area throughout the survey. NVA's were set to record for the duration of the survey, where roosting bats or uncertain behaviours observed, footage was extracted, analysed and saved. A still shot of the darkest point of the survey was also extracted and saved to provide evidence of the survey having taken place. NVA's used were Nightfox Whisker night vision binoculars with a Nightfox XB10 IR torch for each position.
- 3.13 Surveyors were mobile for the purpose of the survey and frequently liaised with one another over observed bat behaviours, monitoring the NVA positions throughout each survey.

Tree Roost Assessment

- 3.14 Ground level tree assessments (GLTA) were undertaken on 9th April 2026 by suitably experienced ecologists with the aid of binoculars and high-powered torches. The trees were searched for potential roosting features (PRFs)² such as:
- Natural holes e.g. knot holes arising from naturally shed branches
 - Man-made holes e.g. cavities that have developed from flush cuts
 - Woodpecker holes
 - Cracks/splits in stems or branches
 - Partially detached or loose bark plates
 - Cankers in which cavities have developed

² BS 8596:2015 Surveying for bats in trees and woodland – Guide. British Standards Institute.

- Compression forks with occluded bark
 - Crossing stems or branches with a suitable space in between
 - Ivy stems with diameters more than 50mm with suitable roosting space behind
 - Bird, bat or dormouse boxes
- 3.15 Certain factors such as orientation of the feature, its height from the ground, the direct surroundings, and its location in respect to other features may enhance or reduce the potential value.
- 3.16 Although the British Standard 8596:2015 document groups trees with moderate and high potential, these have been separated below (as per Table 4.1 in The Bat Conversation Trust Guidelines) to allow more specific survey criteria to be applied.
- 3.17 Using professional judgement, the ground-based PRA assessment classified any trees identified based upon the presence of suitable features as set out in best practice guidance (BCT 2023). Trees were classified into general bat roost potential groups based upon the presence of these features. *Table 3* below broadly classifies the potential categories as accurately as possible as well as discussing the relevance of the features. This table is based upon Table 4.1 and Chapter 6 in Bat Surveys for Professional Ecologists: Good Practice Guidelines.

Table 4: GLTA Bat Roost Potential Categories, classification and survey requirements for bats in trees

Classification of tree	Description of category and associated features (based on potential roosting features listed above)	Likely further survey work/ actions
Confirmed Roost	Evidence of roosting bats in the form of live/dead bats, droppings, urine staining, mammalian fur oil staining, etc.	A Natural England derogation licence application will be required if the tree or roost site is affected by the development or proposed arboricultural works. This will require a combination of aerial assessment by roped access bat workers (where possible, health and safety constraints allowing) and nocturnal survey during appropriate periods (e.g., nocturnal survey - May to August) to inform on the licence. Works to tree undertaken under supervision in accordance with the approved good practice method statement provided within the licence. However, where confirmed roost site(s) are not affected by works, work under a precautionary good practice method statement may be possible.
High Potential	A tree with one or more Potential Roosting Features that are obviously suitable for larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter protection, conditions (height above ground level, light levels, etc) and surrounding habitat. Examples include (but are not limited to); woodpecker holes, larger cavities, hollow trunks, hazard beams, etc.	Aerial assessment by roped access bat workers (if appropriate) and / or nocturnal survey during appropriate period (May to August). Following additional assessments, tree may be upgraded or downgraded based on findings. If roost sites are confirmed and the tree or roost is to be affected by proposals a licence from Natural England will be required.

Classification of tree	Description of category and associated features (based on potential roosting features listed above)	Likely further survey work/ actions
		After completion of survey work (and the presence of a bat roost is discounted), a precautionary working method statement may still be appropriate.
Moderate Potential	A tree with Potential Roosting Features which could support one or more potential roost sites due to their size, shelter protection, conditions (height above ground level, light levels, etc) and surrounding habitat but unlikely to support a roost of high conservation status (i.e., larger roost, irrespective of wider conservation status). Examples include (but are not limited to); woodpecker holes, rot cavities, branch socket cavities, etc.	A combination of aerial assessment by roped access bat workers and / or nocturnal survey during appropriate period (May to August). Following additional assessments, tree may be upgraded or downgraded based on findings. After completion of survey work (and the presence of a bat roost is discounted), a precautionary working method statement may still be appropriate. If a roost site/s is confirmed a licence from Natural England will be required.
Low Potential	A tree of sufficient size and age to contain Potential Roosting Features but with none seen from ground or features seen only very limited potential. Examples include (but are not limited to); loose/lifted bark, shallow splits exposed to elements or upward facing holes.	No further survey required but a precautionary working method statement may be appropriate.
Negligible/No potential	Negligible/no habitat features likely to be used by roosting bats	None

Endoscope Survey

- 3.18 Any trees recorded as containing suitable features which could be used by roosting bats (i.e., holding low – high potential) were surveyed using an endoscope by a suitably qualified and trained bat surveyor where access allowed. This included one tree on Site, and this was assessed from the ground within all suitable crevices highlighted.
- 3.19 All Bat Conservation Trust Good Practice Guideline advice for endoscopy was followed during the survey.

Nocturnal Transect Surveys

- 3.20 The Site was assessed as having moderate habitat suitability for bats as per BCT guidelines. Proposals indicated that the majority of valuable habitats for bats, e.g., hedgerows and trees, would be retained. As such, monthly night-time bat walkover surveys were undertaken to assess which bat species were using the site, which features were used for foraging and commuting and the extent and frequency of their use.
- 3.21 A transect route was designed to cover all natural habitats, wherever possible, within the survey area, with a particular focus on those considered to provide higher bat suitability, such as linear features, woodland, scrub, and waterbodies. The transect was walked by a pair of suitably experienced ecologists, using with a Wildlife Acoustic Inc. Echo Meter Touch bat detector and Apple Inc. iPad. Surveys were only carried out in suitable weather conditions, no rain, no/light wind and greater than 9oC (Table 4).

- 3.22 Each survey commenced at dusk and continued for 2-3 hours, with surveyors walking at a steady pace and recording all bat activity encountered (species, behaviour, time of encounter, and number of passes). The transect route also included five-minute point counts where surveyors would stop and record all bat activity at these specific points.
- 3.23 Post-survey, the bat calls recorded on the transect were then analysed by experienced ecologists using Kaleidoscope software (Wildlife Acoustics Inc.) to verify the bat species identified and the level of activity recorded.
- 3.24 Activity surveys were completed in 2026.

Table 5: NBW Survey Timings and Weather Conditions

Date	Start/Sunset Time	Finish Time	Weather Conditions
01.04.2026	19:40	10:49	Dry, 100% cloud coverage, wind 0-1 BF
05.05.2026	20:43	23:39	Dry, 90% cloud coverage, wind 0-1 BF
01.07.2026	21:19	24:24	Dry, 80% cloud coverage, wind 2-3 BF

Static Bat Detector Surveys

- 3.25 Wildlife Acoustics Inc. Song Meter SM4BAT FS detectors (hereafter referred to as 'SM4BAT detectors') were deployed within the survey area prior to seasonal activity surveys in 2025. Detectors were deployed in habitats likely to be impacted by the development and/or habitats suitable for navigational/foraging routes (*Figure G4*).
- 3.26 Four detectors were deployed per month during May- September 2026.
- 3.27 The SM4BAT detectors were left to record for a minimum of five nights of suitable weather conditions each season. They are programmed to activate 30 minutes before dusk and record continuously until 30 minutes after sunrise.
- 3.28 Following collection, the recordings are analysed using Kaleidoscope software by experienced ecologists. Each sound file (15 seconds in length) is counted as a single bat pass or registration for each species visible in the sound file. The total number of registrations provides an indication of the relative importance of the site/detector location for bats.
- 3.29 As per the updated bat conservation trust guidelines³, Kaleidoscope Pro Auto analysis software was used to analyse the data. Following this, 10% of each species/species group calls (including those tagged as noise and No ID) were checked by experienced ecologists.

Limitations

- 3.30 To meet standard guidance, further surveys are required during 2026 that will be completed in October. Please see EclA for further information on this limitation.
- 3.31 Due to the high level of variation in echolocation calls and the properties of zero-crossed frequency division recordings, it is not always possible to identify calls down to species level. These calls are therefore identified to genus level, which is sufficient for a suitable assessment of potential impacts.

³ [Bat Survey Guidelines 23](#)

- 3.32 The SM4BAT detectors do not discern between individual bats or a single bat passing the microphone several times. Therefore, the number of registrations can only provide an indication of bat activity.

4.0 RESULTS

Desk Study

- 4.1 Consultation with WSBRC identified twelve bat records within 2km of the Site:

Table 6: Summary of Records

Species	Approximate Distance from Site	Date of Most Recent Record
Serotine <i>Eptesicus serotinus</i>	680m	2020
Myotis Bat <i>Myotis spp.</i>	450m	2019
Daubenton's <i>Myotis daubentonii</i>	1km	2020
Whiskered <i>Myotis mystacinus</i>	590m	2015
Natterer's <i>Myotis nattereri</i>	945m	2020
Noctule <i>Nyctalus noctula</i>	660m	2020
Pipistrelle Bat <i>Pipistrellus spp.</i>	4.1km	2015
Common Pipistrelle <i>Pipistrellus pipistrellus</i>	450m	2019
Soprano Pipistrelle <i>Pipistrellus pygmaeus</i>	220m	2015
Long-eared Bat <i>Plecotus spp.</i>	1.6km	2020
Brown Long-eared <i>Plecotus auritis</i>	945m	2020
Lesser Horseshoe <i>Rhinolophus hipposideros</i>	1km	2021

- 4.2 A search of MAGIC identified four EPS mitigation licences (EPSML) issued for bats by Natural England within 2km of the Site:

Table 7: Bat EPSML within 2km

Reference	Species	Purpose
2017-31272-EPS-MIT	Common pipistrelle	Destruction of resting place
2018-37916-EPS-MIT	Serotine	Destruction of breeding place
2015-14691-EPS-MIT	Common pipistrelle Brown Long-eared Serotine	Destruction of resting place
EPSM2011-2875	Common Pipistrelle Soprano Pipistrelle Brown Long-eared Serotine	Destruction of resting place

- 4.3 Several bat surveys have been completed for nearby planning applications within 2km of Site in the last six years and are summarised below:

Table 8: Summary of Nearby Planning Application Surveys

Site Name & Planning Reference	Approximate Distance from Site	Survey Period	Methods Used	Results
Land North of Berryfield Lane– PL/2025/00626	10m south	May–September 2024	Activity transects, static detectors, GLTA	Five trees surveyed and assessed as holding potential to support roosting bats. Site assessed as providing local value to commuting and foraging widespread species

Site Name & Planning Reference	Approximate Distance from Site	Survey Period	Methods Used	Results
				of bat, as well as lesser and greater horseshoe and barbastelle.
Land at Semington Road – 20/01938/OUT	170m south-east	April, June 2019	PRA, emergence survey	One building assessed as holding low potential for bats – subsequent emergence survey did not record any bat emergences.
Land North of Bath Road – PL/2025/06749	2km east	May – October 2024	NBW/static surveys, GLTA	Six trees identified with potential roosting features for bats. NBW/static surveys indicate that Common and Soprano pipistrelle are the main species commuting across the site with some low numbers of rarer species including greater and lesser horseshoe.

Habitats

- 4.4 The habitats on Site were of moderate value for bats. The managed fields, which dominate the Site, offer some limited opportunities for bats though are likely to be lacking in an abundance of potential invertebrate prey. However, the trees and hedgerows do provide continuous habitat for foraging and commuting and they also provide connectivity to habitats in the wider area. The River Avon lies 595m to the east of the Site and vegetated along the length, providing a dark corridor through the landscape across adjacent farmland to the Site. The wider landscape surrounding the Site to the east and south comprises open agricultural fields which are connected via hedgerows which offers a similar degree of suitability. The land to the north consists of a built-up urban environment which is unlikely to hold much in the way of suitably foraging or commuting area for bat species, especially light intolerant species.

Building Assessment

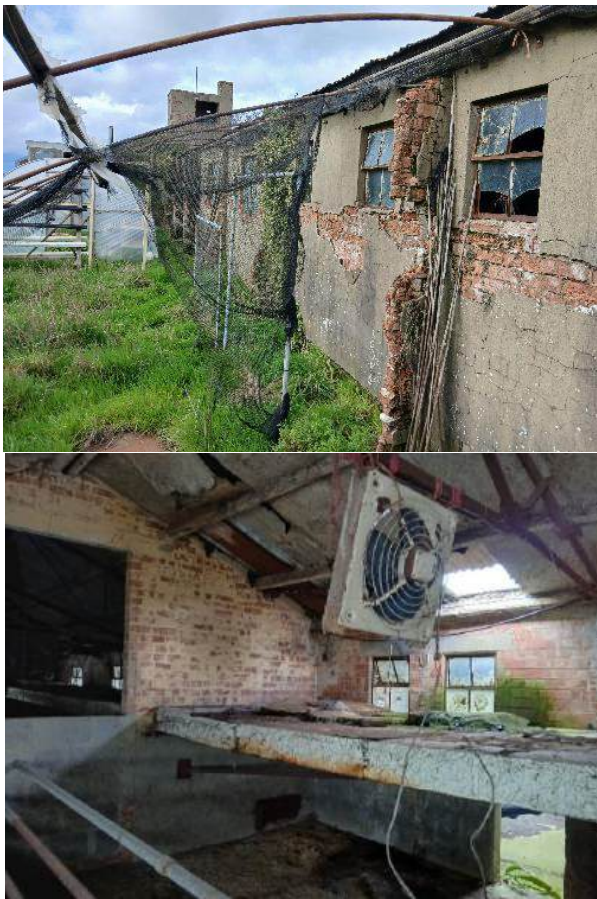
- 4.5 There are 18 buildings on-site, associated with a former pig farm which were all surveyed for bat roosting potential. The structures vary from low breeze block and corrugated tin animal sheds to larger open-sided barns. A brick-built water tower associated with past use of the site prior to pig farming was also present. The majority of buildings were disused and dilapidated, having not been maintained. A few were still in use for storage, containing farm equipment and refuse, with one unit still being used as a tool shed, or continuing to house livestock, including cattle and horses.
- 4.6 The assessment of the buildings for bat roost potential is summarised below in *Table 9* and demonstrated on *Figure G1*.

Table 9: Building Assessment Summary

Building (Figure G1)	Description	Bat roost potential
B1	Single storey, breezeblock built stabling block, subdivided into interconnected units, with a single-skinned pitched roof composed of corrugated asbestos aggregate sheets, supported by steel frame and timber joists. No roof void present. Located to the northeast of the farmyard. Two open stable doors were present on the southern aspect. PVC guttering around eaves. Each unit was further subdivided into animal pens with metal gates and low entrance ways for livestock to access exterior. Each was covered over with a thick polystyrene 'ceiling' sheet, which were deteriorating and/or partially collapsed. Windows and doors in poor repair, with timber frames rotting forming narrow gaps. Missing mortar between breezeblocks on exterior were superficial and unsuitable for bats. Limited potential for bats. <u>No evidence of bats.</u> <i>Potential for nesting birds, including swallows and pigeons.</i> 	Negligible
B2	Single storey, breezeblock-built building used as a storage space, with a single-skinned pitched roof composed of corrugated asbestos aggregate sheets, supported by steel frame and timber joists. No roof void present. Metal guttering around eaves. Partial internal roof lining of metal sheets. Window on west aspect missing glass pane, door left open offering ease of access into interior. Cracks in breezeblocks and around door frame superficial. Interior with clutter formed by discarded refuse. Dead hedgehog and evidence of roosting birds. <u>No evidence of bats.</u> 	Negligible

Building (Figure G1)	Description	Bat roost potential
		
B3	Single storey, breezeblock built stabling block, formed of a main access corridor with animal pens along one side. Each was covered over with a thick polystyrene 'ceiling' sheet, which were deteriorating and/or partially collapsed. Southern wall largely comprising loosely fitted timber boards, affixed to a steel frame, over a low breezeblock wall. Located to the east of the farmyard. An open stable door was present on the eastern aspect, with another door to the west left closed but damaged and dislodged leaving gaps in the frame. Single-skinned pitched roof composed of corrugated asbestos aggregate sheets, with sporadic skylights formed by translucent PVC sheets, supported by steel frame and timber joists. No roof void present. PVC guttering around eaves. There were no potential crevices for roosting inside, well lit, with breeze passing through and rattling timber panelling and stable doors. <u>No bat evidence found.</u> <i>Note: Potential for nesting birds, including swallows and pigeons</i> 	Negligible

Building (Figure G1)	Description	Bat roost potential
B4	Single-storey store building, composed of corrugated, painted metal outer skin and internal wood chipboard/MDF panelling. Pitched roof composed of asbestos aggregate roof sheets, with internal lining of wood boards contiguous with the inner wall coverings. Heavy sliding wooden door. Formerly used as a potting shed, with leftover discarded plastic pots, compost, and tools. Entrance left open, with a slow-moving ventilation fan at the rear opening into exterior. There were no potential crevices for roosting inside. <u>No bat evidence found.</u> 	Negligible

Building (Figure G1)	Description	Bat roost potential
B5	Single storey, brick-built stabling block, formed of a main access corridor with animal pens along one side. Each was covered over with a thick polystyrene 'ceiling' sheet, which were deteriorating and/or partially collapsed. Southern wall with regularly spaced windows and external concrete rendering which was crumbling away. Vegetation growing extensively through these walls, with several windows either missing panes or with damaged panes. Gaps in brickwork around window frames prevalent. The building was subdivided into animal pens with metal railings and low entrance ways for livestock to access the exterior, with adjoining breezeblock built outdoor enclosures on the northern aspect, with tin roofs and fabric sheeting over entrances. Single-skinned pitched roof composed of corrugated tin sheets, interior chipboard panelling and sporadic skylights formed by translucent PVC sheets, supported by steel frame and timber joists. No roof void present. There were no potential crevices for roosting inside. <u>No bat evidence found.</u> <i>Note: Potential for nesting birds, including swallows, pigeons, and barn owls</i> 	Negligible
B5 (Tower)	At the western end of building B5, a disused water tower adjoined the stabling block and animal shed. Brick built with comparable concrete render to exterior of the adjoining animal sheds. Ground floor tool shed accessible through bolted timber door. Main tower interior empty aside from remains of dead pigeon. Upper floor of tower accessed via metal ladder affixed to east facing aspect, requiring climbing across tin roofing of the animal sheds and not accessed as a result. Ladder terminates at a large opening in the side of the tower, providing access into interior space. Smaller openings in brickwork on western aspect, and window on southern aspect. Brickwork and rendering crumbling and in poor state of repair, leaving crevices behind. Swallow nests in recesses in brickwork up the sides of the interior. <u>No bat evidence found.</u> <i>Note: Potential for nesting birds, including swallows, pigeons, and barn owls.</i>	Low- Moderate

Building (Figure G1)	Description	Bat roost potential
		
B6	Low, single-storey animal shed, with small adjoining animal pens along western and eastern side, accessed via a central corridor. Pens subdivided by timber panel dividers. Each pen with soil and debris. Missing door on southern gable end and a slow-moving ventilation fan at the northern end opening into exterior. Pitched corrugated aggregate sheet roof, with internal lining of wood boards affixed to steel frame. Boards do not extend to internal apex of roof pitch, leaving exposed gap to exterior where panels overlap near apex. Heavily cobwebbed interior with leaf litter through main corridor. There were no potential crevices for roosting inside. <u>No bat evidence found.</u>  	Negligible
B7	Large open sided barn, adjoining a small breezeblock built stable block. Open-sided barn formed of timber sleepers and corrugated metal sheeting, with steel frame and pitched corrugated tin roofing sheets. Stable block with pitched roof, composed of overlapping corrugated aggregate sheeting. Bolted wooden stable doors on south aspect.	Negligible

Building (Figure G1)	Description	Bat roost potential
	Stables in use for storage of equestrian equipment and refuge for farm cats. Barn open to the elements and stables likely to be disturbed, as they remain in at least semi-regular use. There were no potential crevices for roosting inside. <u>No bat evidence found.</u> 	
B8	Disused, flat roofed refrigeration unit, on raised breezeblock foundations. Open doorways on both eastern and western aspects. Exterior panelling of discoloured aggregate sheeting. Eaves with lead flashing, which overlaps roof surface and walls. Aluminium framed walls, with timber joist ceiling supports. Walls and ceilings formed of PVC panelling, leaving smooth surfaces. Metal grating and aggregate panel flooring/ There were no potential crevices for roosting inside. <u>No bat evidence found.</u> 	Negligible
B9	Series of three open-sided, adjoining barn units, with single-skinned corrugated tin sheet walls. Steel framed with asymmetrical pitched roofs composed of corrugated tin sheeting, with concrete aggregate hanging tiles on central unit, which overlap metal panel walls with gap behind. No roof voids. Used for housing livestock (cattle and a bullock) and currently in use and subject to regular daytime disturbance. Open at western facing aspects, with low metal gates. Well lit via skylights formed of translucent PVC roof sheets and wall upper wall panels. Not accessed. 	Negligible

Building (Figure G1)	Description	Bat roost potential
		
B10	Large open-sided barn, with single-skinned corrugated tin sheet walls. Steel framed with pitched roof composed of corrugated tin sheeting and translucent PVC skylights. Used for housing livestock (cattle) and currently in use and subject to regular daytime disturbance. Open at eastern facing aspect, with low metal gates. Well-lit via skylights formed of translucent PVC roof sheets and wall upper wall panels. Not accessed. 	Negligible
B11	Single storey timber horse shed, with pitched roof of felt, bolted onto a timber frame. No roof void or suspended ceiling. Window frames and fascia boarding fitted flush into the timber wall panelling. Open doorway on east facing aspect, with access into small hardstanding area that adjoins a field. Currently in use by a horse. Fascia boards around eaves and soffit board, with painted PVC guttering affixed. Not accessed. 	Negligible

Building (Figure G1)	Description	Bat roost potential
B12	A pair of low concrete pig styes in a field to the east of the farm buildings. Constructed of semi-circular concrete blocks with brick-built gables and corrugated tin sheeting. Not accessed. 	Negligible
B13		
B14	A long former barn previously used for chickens consisting of concrete walls with a corrugated asbestos roof. There are several vents within the roof which provide access to the internals. There is wooden boarding creating a layer between the corrugated roofing internally which could be accessed by roosting bats. There was potential for bats to roost inside within the open nature of the rooms. A single lesser horseshoe was recorded hanging within one of the rooms during the day in July. 	Confirmed roost
B15	A small two storey storage type barn with a duo pitched corrugated sheet roof between B14 and B15. The bottom half of the building is concrete composite block, and the top half consists of wooden boarding. The upper floor was inaccessible during the survey. The internals of the lower floor are open with a door only covering the lower half of this wall. Therefore, access for bats is possible here. Furthermore, the corrugated roofing is warped slightly, along with a window covering which could provide bats access to the upper floor as well. 	High potential

Building (Figure G1)	Description	Bat roost potential
B16	A wooden single storey barn with a corrugated undulating roof. Each side of the building contains many windows however, most of these are blocked up with only occasional windows open. The internals viewed but not accessed, consisted of a concrete floor with internal beams leading to the ceiling. The ceiling is low and is lined with an internal boarding which is gapped from the external corrugated sheeting potentially providing gaps between here for roosting bats. 	High potential
B17	An L shaped stable block adjoining a tower (B18 below). The building is mainly comprised of wooden exterior walls with corrugated sheet roofing. There is a brick wall internally which separates part of the inside rooms from the tower. The windows and doors are secure however; the roof contains some gaps between the wooden beams and the corrugated roof. 	Low potential
B18	Second tower located to the west of the Site. The building is comprised of brick with some areas patched in with cement mortar. The existing doorway on the western side is blocked up however; there is a permanently open large gap in the top of the tower facing eastwards which bats could access. 	Low potential

Bat Building Emergence Results

- 4.7 An emergence survey was undertaken on 8th June 2026 on the disused water tower B5 which demonstrated low potential for roosting bats following the building assessment.

- 4.8 During the emergence survey no bats were recorded emerging from the water tower.

Tree Assessment

- 4.9 Seven PRF trees were identified on Site, meaning they contained one or more potential roosting features. They were concentrated along the boundaries of the northern parcel of Site. They are shown in *Figure G3* and summarised below:

Table 10: PRF Tree Summary

Tree Ref.	Assessment	Tree species	Description	Photo
G1	Negligible	Silver Birch, <i>Betula pendula</i>		
G2	Negligible	Hawthorn, <i>Crataegus monogyna</i> , Blackthorn, <i>Prunus spinosa</i> , Elder, <i>Sambucus nigra</i> , English Elm, <i>Ulmus procera</i>	Elm dead but no features for bats	
G3	Negligible	Goat Willow, <i>Salix caprea</i>		
G4	Low	Hawthorn, <i>Crataegus monogyna</i>	Ivy clad - possibly negligible but can't really access	
G5	Negligible	Hawthorn, <i>Crataegus monogyna</i>		
G6	Negligible	Ash, <i>Fraxinus excelsior</i> , Hawthorn, <i>Crataegus monogyna</i> , Goat Willow, <i>Salix caprea</i>		

Tree Ref.	Assessment	Tree species	Description	Photo
G7	Negligible	<i>Sambucus nigra</i> , <i>Crataegus monogyna</i>		
G8	Negligible	<i>Ulmus procera</i> , <i>Crataegus monogyna</i> , <i>Sambucus nigra</i> , <i>Corylus avellana</i>		
G9	Negligible	<i>Fraxinus excelsior</i> , <i>Sambucus nigra</i> , <i>Crataegus monogyna</i> , <i>Aesculus hippocastanum</i> , <i>Acer pseudoplatanus</i>	All trees in good health/ immature lacking features	
G10	Negligible	<i>Fraxinus excelsior</i> , <i>Aesculus hippocastanum</i> , <i>Crataegus monogyna</i> , Elder, <i>Sambucus nigra</i> , <i>Acer pseudoplatanus</i> , <i>Acer campestre</i>	See G10a and G10b for features. G10c and G10d have ivy which could be obscuring features but likely to be negligible.	
G10a	Low	Horse Chestnut, <i>Aesculus hippocastanum</i>	PRF- partially detached platey bark could be a roost feature however open at the top.	
G10b	Low	Horse Chestnut, <i>Aesculus hippocastanum</i>	PRF- Partially detached platey bark. Most of the lifted bark is superficial and too open however there is a section with a small pocket suitable for bats	
G12c	Low	Ash, <i>Fraxinus excelsior</i>	Ivy clad	
G12d	Low	Ash, <i>Fraxinus excelsior</i>	Ivy clad	

Tree Ref.	Assessment	Tree species	Description	Photo
T1	Negligible	Hawthorn, <i>Crataegus monogyna</i>		
T2	Low	Hawthorn, <i>Crataegus monogyna</i>	Ivy clad	
T3	Negligible	Goat Willow, <i>Salix caprea</i>		
T4	Negligible	Hawthorn, <i>Crataegus monogyna</i>	Ivy clad, no visible features	
T5	Negligible	Hawthorn, <i>Crataegus monogyna</i>		
T6	Moderate	Crack Willow, <i>Salix fragilis</i>	Hazard beam- PRF low- open and exposed but small pockets available at northern end. Branch tear out- PRF moderate - massive tree failure, lots of knocks and crevices including several pockets suitable for bats	 
T7	Negligible	English Oak, <i>Quercus robur</i>		
T8	Negligible	Ash, <i>Fraxinus excelsior</i>		

Tree Ref.	Assessment	Tree species	Description	Photo
T9	Negligible	Wild Cherry, <i>Prunus avium</i>		
T10	Negligible	Hawthorn, <i>Crataegus monogyna</i>		

Endoscope Survey

- 4.10 T6 which was recorded as a crack willow on Site holding moderate bat roosting potential was subject to an endoscope survey on 27th July 2026. All crevices which were reachable from the ground were assessed and no evidence of bats or individual bats were recorded during the survey.

Night-time Bat Walkover Surveys

- 4.11 Five species were recorded during the 2026 NBW surveys: common pipistrelle, soprano pipistrelle, Myotis species, noctule and serotine.

Table 11: NBW Survey Summary

Date	Total Bat Contacts	Total Contacts per Species	Total Contacts at Vantage Points	Total Contacts on Transect
01 April 2026 (Figure G5b)	29	Common pipistrelle: 28 Myotis Species: 1	Common pipistrelle: 14	Common pipistrelle: 14 Myotis Species: 1
05 May 2026 (Figure G6b)	30	Common pipistrelle: 24 Soprano pipistrelle: 2 Serotine: 3 Myotis Species: 1	Common pipistrelle: 6 Serotine: 1	Common pipistrelle: 18 Soprano pipistrelle: 2 Serotine: 2 Myotis Species: 1
01 July 2026 (Figure G7b)	35	Common pipistrelle: 20 Soprano pipistrelle: 1 Noctule: 1 Serotine: 7 Myotis Species: 2 Noctule or Serotine Species: 4	Common pipistrelle: 10 Soprano pipistrelle: 1 Noctule: 1 Serotine: 6 Myotis Species: 1 Noctule or Serotine Species: 2	Common pipistrelle: 10 Serotine: 1 Myotis Species: 1 Noctule or Serotine Species: 2

- 4.12 Of the two vantage point locations, vantage point 2 on the south-eastern boundary recorded the most activity and species across all three surveys. This area lies adjacent to two connected hedgerows, leading over the farm building and semi-improved grassland to the east of the Site. These areas are likely to provide good foraging opportunities, with the attraction of insects to the denser areas of habitat within this area of Site.
- 4.13 Total bat contacts were relatively consistent across the surveys. Common pipistrelle were the highest recorded during every survey (76.5% of total contacts). Myotis species were also recorded on each survey but in low numbers every time with only a single pass recorded. Serotine, noctule and soprano pipistrelle were also recorded in low numbers across almost every survey.

- 4.14 Whilst most bat individuals were recorded as commuting only there were several foraging passes noted, mostly from common pipistrelle indicating that the Site is used for both behaviours consistently across the season.

Static Detector Surveys

- 4.15 During the automated detector surveys to date, a total of 7,611 registrations were recorded by twelve units placed across the site. Common pipistrelle *Pipistrellus pipistrellus* was the most frequently recorded species (approximately 89.29% of total data), with other species recorded, in order of abundance, as below:
- Soprano pipistrelle (S.Pip) – 5.141%
 - Myotis Species (Myo) – 2.44%
 - Barbastelle (Barb) – 1.48%
 - Sertotine (EpsTer) – 0.39%
 - Nathusius' Pipistrelle (PipNat) – 0.34%
 - Lesser Horseshoe (R.Hip) – 0.42%
 - Noctule (N.Noc) – 0.29%
 - Long Eared Species (PleSpp) – 0.16%
 - Greater Horseshoe (R.Fer) – 0.03%
 - Nyctalus Species (NycSpp) – 0.01%
- 4.16 The automated detectors identified the presence of three Annex II bat species: barbastelle *Barbastella barbastellus*, greater horseshoe *Rhinolophus ferrumequinum*, and lesser horseshoe *Rhinolophus hipposideros*.
- 4.17 Between April and June 2026, the automated detector surveys recorded a total of 113 barbastelle, 32 lesser horseshoe, and 2 greater horseshoe registrations across all survey locations.
- 4.18 The species assemblage was strongly dominated by common pipistrelle, accounting for approximately 89.3% of all bat registrations (6,796 of 7,611 records). Soprano pipistrelle was the second most frequently recorded species (391 registrations; 5.1%), followed by Myotis species (186 registrations; 2.4%) and barbastelle (113 registrations; 1.5%). Other species, including serotine, lesser horseshoe, Nathusius's' pipistrelle, noctule, brown long-eared, greater horseshoe, and Leisler's bat, were recorded infrequently and at low levels of activity.

Table 12: Static Survey Summary

APRIL (01.04.2026 – 08.04.2026)									
	Unit 29 SOUTH		Unit 30 EAST		Unit 31 WEST		Unit 32 NORTH		
Species	Count	%	Count	%	Count	%	Count	%	TOTAL
PIPPIP	912	88.5%	339	90%	677	92.9%	272	84.5%	2,200
PIPPYG	90	8.7%			40	5.5%	25	7.8%	155
PIPNAT	4	0.39%			1	0.13%	1	0.31%	6
NYCEPT	1	0.09%							1

EPSTER	1	0.09%	1	0.26%					2
MYOSPP	19	1.8%	7	1.9%	5	0.69%	17	5.3%	48
RHIHIP	4	0.39%			6	0.82%			10
BARBAR			28	7.5%					28
PLESPP							1	0.31%	1
TOTAL	1,031		375		729		322		2451

MAY (05.05.2026 – 11.05.2026)									
		Unit 11 WEST	Unit 24 EAST		Unit 1 NORTH		Unit 2 SOUTH		
Species	Count	%	Count	%	Count	%	Count	%	Total
PIPIPI	42	55.3%	194	54%	215	83%	1009	89%	1460
PIPPYG	6	7.9%	31	8.6%	13	5%	92	8.1%	142
PIPNAT	4	5.3%			4	1.5%	12	1.06%	20
NYCNO	5	6.6%	8	2.2%	5	1.9%	1	0.089%	19
EPSTER	10	13.2	7	1.9%	2	0.77%	1	0.089%	20
MYOSPP	11	14.5%	32	8.9%	16	6.2%	19	1.7%	78
RHIHIP	1	1.3%	4	1.1%	1	0.33%	2	0.18%	8
BARBAR	1	1.3%	81	23%	2	0.77%			84
RHIFER			1	0.28%					1
PLESPP			1	0.28%					1
TOTAL	80		359		259		1136		1,833

JUNE (01.06.2026 – 08.06.2026)									
	Unit 1 EAST		Unit 8 NORTH		Unit 10 WEST		Unit 11 SOUTH		
Species	Count	%	Count	%	Count	%	Count	%	TOTAL
PIPIPI	1517	99.6%	30	79%	850	96%	739	85%	3,136
PIPPYG	14	0.9%	1	2.6%	10	1.14%	69	8%	94
PLESPP	4	0.26%	1	2.6%			5	0.58%	10
NYCNO	1	0.06%			1	0.11%	1	0.12%	3
EPSTER	2	0.13%	2	5.3%	2	0.23%	2	0.23%	8
MYOSPP	3	0.19%	4	11%	16	1.8%	37	4.3%	60
RHIHIP					2	0.23%	12	1.4%	14
RHIFER							1	0.12%	1
BARBAR							1	0.12%	1
TOTAL	1541		38		881		867		3327

4.19 Ten species were recorded across the deployment range with the highest number recorded during the May deployment. Common Pipistrelle was the highest recorded species (6,796 contacts, 89.3%) with low numbers of Annex II listed species also recorded including greater and lesser horseshoe, and barbastelle

- 4.20 Bat activity level was consistently higher along the southern boundary of the Site between April and May, with the eastern statics demonstrating the highest bat contacts recorded in June.
- 4.21 Annex II species were recorded across the Site, but a higher number were recorded on the southern and eastern detectors with barbastelle numbers specifically recorded more frequently on the eastern detectors. The northern and western positioned detectors consistently demonstrated low numbers of passing bats.

5.0 DISCUSSION AND RECOMMENDATIONS

GLTA

- 5.1 Six trees on Site were found to hold low bat roosting potential, and one tree was recorded as holding moderate potential features, which could hold larger numbers of bats or be used frequently. If any of these trees are to be removed as part of the proposals, then aerial tree assessments and/or endoscope surveys are required to closely inspect the features to confirm their potential for bats and whether these will need to be replaced.

Building surveys

- 5.2 Six buildings were recorded with bat roosting potential on Site during the preliminary roost inspections. These were B5 (Tower 2) which held low-moderate potential, B14 which held a **confirmed lesser horseshoe roost** with one individual seen internally, B15 and B16 which both held high potential and B17 and B18 which both held low potential.
- 5.3 A subsequent emergence survey of B5 Tower 2 did not record any bats emerging from the highlighted features. All other highlighted buildings will require further survey effort to confirm whether roosts are present and to confirm the roost types on Site (especially for B14).
- 5.4 Further survey effort for B14, 15, 16, 17, and 18 will comprise at least two emergence surveys to be undertaken during the bat active season in August to September 2026. Additional to this, B14 will require two remote static detector surveys are required to run concurrently with the emergence surveys set to record throughout the day and night for at least 1 week per deployment.
- 5.5 Once the surveys are completed, the results will be used to inform further detailed mitigation for replacing any roosts present, including within B16 and a European Protected Species Mitigation Licence (EPSML) from Natural England will be applied for to replace the roost(s) appropriately and remove the building lawfully.

NBW and Static surveys

- 5.6 A total of ten species/species groups were recorded on Site across the surveys undertaken between April and June 2026, with species activity levels remaining broadly consistent throughout the survey period. Pipistrelle species dominated the assemblage in all months, with common pipistrelle being the most consistently recorded species, accounting >89% of all static registrations recorded. The majority of the assemblage comprised similarly common species, which were recorded at consistently low levels of activity.
- 5.7 Bat activity was influenced by boundary features, with the highest levels consistently concentrated along the southern and eastern boundaries of the Site. Units positioned along these edges repeatedly recorded the greatest number of registrations, indicating that treelines, and boundary hedgerows in these areas form the primary movement corridors and foraging areas for bats on Site.
- 5.8 Activity within the central field areas remained consistently low throughout surveys, indicating this open habitat is of limited value to bats beyond occasional commuting.
- 5.9 Myotis species were recorded at relatively consistent levels, with slightly increased activity in May towards along the eastern boundary. Nyctalus species were detected throughout the

season in low numbers, with slightly higher numbers peaking in May, typically as commuting passes over open grassland or along boundary treelines. *Plecotus* activity was largely absent until June where low numbers of passes were recorded on the eastern and southern statics, with one pass on the northern static.

- 5.10 Three **Annex II** species were recorded over the survey period: **lesser horseshoe**, **greater horseshoes**, and **barbastelle**. **Lesser horseshoe** activity was detected in low numbers across several months. Activity levels suggest infrequent commuting, rather than regular foraging use. **Greater horseshoes** were the least recorded sporadically, with single passes in May and June on units positioned along the eastern and southern boundaries. **Barbastelles** were recorded during all month onwards, with peak numbers during May.

Mitigation

Lighting

- 5.11 A sensitive lighting strategy must be designed for the Site with regards to good practice guidance⁴ in order to retain the functionality of bat commuting habitat across the Site. This is particularly important for the light-averse bat species which have been recorded using the Site, notably, Lesser and Greater Horseshoe and Barbastelle. Recommendations include:
- Dark corridors across the centre and along the boundaries of the Site including along proposed mixed scrub, rough grassland and SuDS to maintain foraging and commuting corridors for all species of bat. Along the boundaries it is recommended that the lighting strategy is designed to prevent lighting increases above 0.5lux.
 - The avoidance of unnecessary lighting or direct lighting of trees and hedgerows during both construction and operation. Around B1 identified as supporting a bat roost, the lighting strategy will be designed to prevent lighting increases above 1 lux and this will also be limited around any proposed replacement roost.
 - Lighting should comprise low pressure sodium lights, as they emit a single wavelength and attract fewer insects.
 - Directional lighting should be used to avoid upward lighting and light spillage.
 - Lighting columns should be as short as possible to reduce horizontal light spill
 - Installing low wattage LED security lighting on short trigger timers on buildings close to green infrastructure/retained habitat during construction to avoid future installation of unsuitable lighting types for bats.
- 5.12 This is especially important along the boundaries to the south and east where development will be positioned. Both of these boundaries will be buffered with GI. Bats were recorded commuting along these features, and this includes Annex II listed species such as Barbastelle, Lesser Horseshoe and Greater Horseshoe. bats are considered to be light intolerant and any lighting proposed to be within 10m of these features must be faced downwards away from the boundaries to ensure light spill falls back into the Site itself and not on the commuting features.
- 5.13 Where any areas of hedgerow removal are required for the creation of accesses, 'hop-overs' can be created to help maintain the integrity of the hedgerows as commuting routes for bats.

⁴ Institute of Lighting Professionals (2023) *Guidance Note 8 Bats and Artificial Lighting*. BCT, ILP.

- 5.14 Details of specific lighting schemes for the Site will be included within the strategy, which will be secured through a planning condition, ensuring the Site contains dark corridors and appropriate types of lighting to continue to encourage bats.

Habitat mitigation

- 5.15 Areas of rough species rich grassland, mixed scrub and SuDS basins will be included through the centre of the Site, and these areas are likely to attract invertebrates, which will provide a food source for commuting bats. The proposed habitats within this parcel provide an enhancement on the existing habitat, which is currently species poor, modified managed grassland. These areas of habitat proposed for GI will provide appropriate additional foraging and commuting habitat for bat species to continue to use the Site into the long-term.
- 5.16 All existing trees will be retained as part of the proposals. New native tree planting will be included in between, and around the edges, of the development and within the GI area towards the centre. These will be unlit and will provide new areas of canopy cover once established, further increasing opportunities for invertebrates, and in turn increasing the available foraging resource for bats.

Bat roost replacement

- 5.17 Following the results of further necessary surveys, the replacement roost which will be required for the lesser horseshoe in B14 will need to be provided on Site. This should be prioritised within an area which will receive little to no human effect such as footpath or road use and should be placed in an area which provides suitable connectivity across Site and through to the wider landscape. It is imperative that the roost is not lit in any way as part of the proposals. Detailed roost design will be provided once the survey results are assessed.

Enhancements

- 5.18 The development should seek to provide roosting opportunities for the local bat population by installing bat boxes on existing mature trees located at the boundaries, as well as incorporating bat bricks into the built fabric of residential dwellings. Bat boxes and bricks should be arranged around the development close to green infrastructure and on different aspects, to encourage choice of a variety of alternative roost sites.

FPCR Environment and Design Ltd

Registered Office: Lockington Hall, Lockington, Derby DE74 2RH
Company No. 07128076. [T] 01509 672772 [E] mail@fpcr.co.uk [W] www.fpcr.co.uk

This report is the property of FPCR Environment and Design Ltd and is issued on the condition it is not reproduced, retained or disclosed to any unauthorised person, either wholly or in part without the written consent of FPCR Environment and Design Ltd. Ordnance Survey material is used with permission of The Controller of HMSO, Crown copyright 100019980.



This drawing is the property of FPCR Environment and Design Ltd and is issued on the condition it is not reproduced, retained or disclosed to any unauthorised person, either wholly or in part without written consent of FPCR Environment and Design Ltd

Ordnance Survey material - Crown Copyright. All rights reserved. Licence Number: 100019980 (Centremapslive.com)



Site Boundary

Buildings with Bat Potential

- High
- Moderate
- Low
- Negligible

date		drwn/chkcd	
29/07/26		IRM / KO	
client			
Bellway Homes Ltd.			
project			
Land at Townsend Farm, Melksham			
title		scale	
BUILDING LOCATION PLAN		1:1,200 @ A3	
number		rev	
FIGURE G1		-	



Site Boundary

Buildings with Bat Potential

Moderate

Negligible

Surveyor / Camera Locations

Surveyor Locations

Camera Locations

Field of View

drawn date
29/07/26

drwn/chkd
IRM / DC

client
Bellway Homes Ltd.

project
**Land at Townsend Farm,
Melksham**

title
**BAT EMERGENCE SURVEY
REFERENCE PLAN**

scale
1:200 @ A3

number
FIGURE G2

rev
-

FPCR | environment
& design



This drawing is the property of FPCR Environment and Design Ltd and is issued on the condition it is not reproduced, retained or disclosed to any unauthorised person, either wholly or in part without written consent of FPCR Environment and Design Ltd

Contains OS Data © Crown copyright [and database rights] 2026.



Site Boundary

Bat Roosting Potential

- Low
- Moderate
- Negligible

drawn date
29/07/26

drwn/chkd
JS/ DC

client
Bellway Homes Ltd

project
**Land at Townsend Farm,
Melksham**

title
BATS IN TREES PLAN

scale
1:1,700 @ A3

number
FIGURE G3

rev
-

FPCR | environment
& design



- Site Boundary
- Static Bat Detector Locations
- ★ April
 - ★ June
 - ★ May

drawn date 29/07/26
drwn/chkd JS / DC

client Bellway Homes Ltd
project Land at Townsend Farm, Melksham

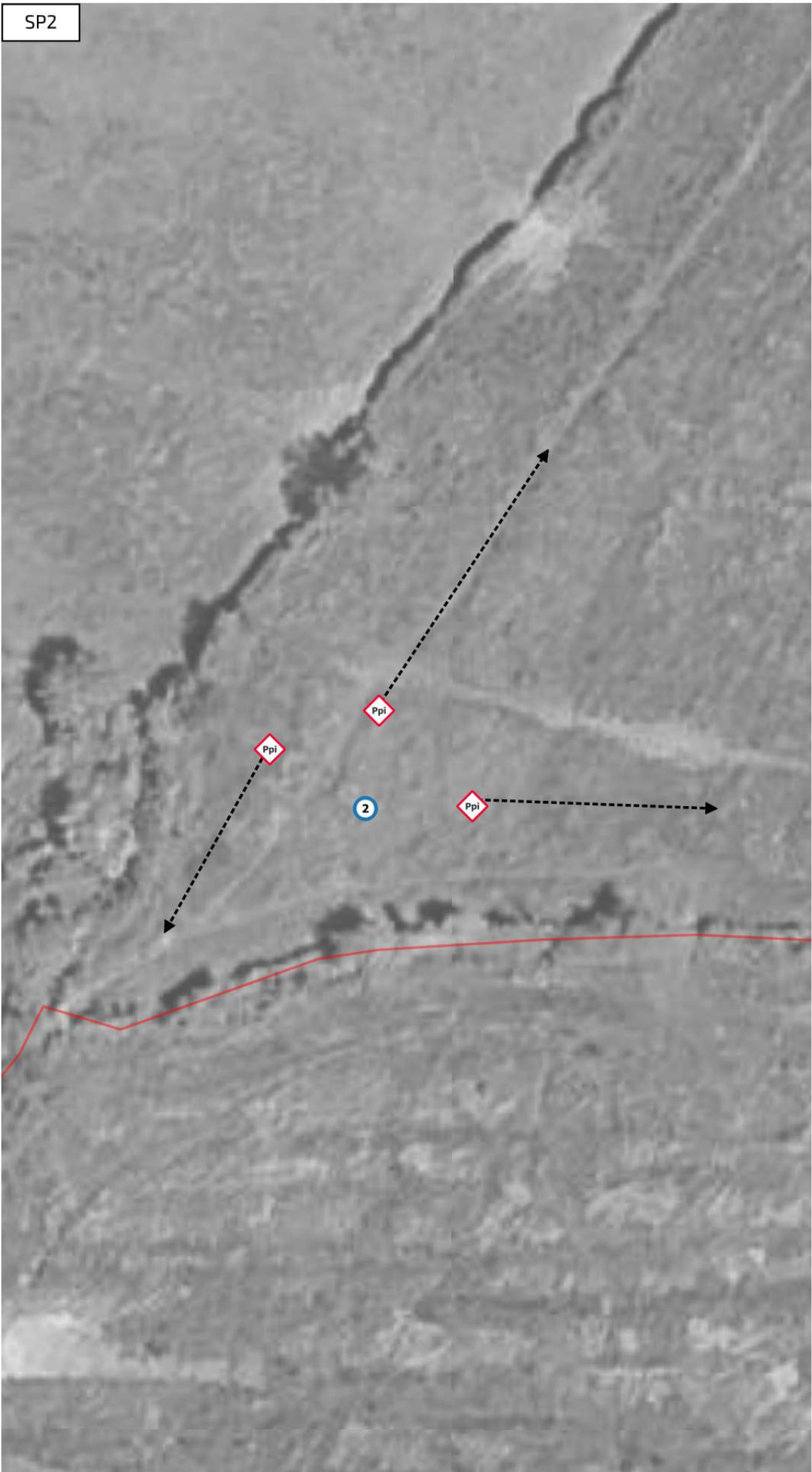
title STATIC BAT DETECTOR LOCATION PLAN
scale 1:1,800 @ A3

number FIGURE G4
rev 13370

FPCR | environment & design



This drawing is the property of FPCR Environment and Design Ltd and is issued on the condition it is not reproduced, retained or disclosed to any unauthorised person, either wholly or in part without written consent of FPCR Environment and Design Ltd
Ordnance Survey material - Crown Copyright. All rights reserved. Licence Number: 100019980 (Centremapslive.com)



L:\13700\13770\GIS\C - Bats\Bat Transect Template - Sonobat\13770 Flightlines April.qgz
t: 01509 672772 e: mail@fpcr.co.uk w: www.fpcr.co.uk

N

01530m

Site Boundary

Surveyor Locations
(with reference)

Bat Contacts

April

Behavioural Observation Arrows

Commuting

Species

Ppi - Common Pipistrelle

Non-visual Bat Contacts - SP1

Species

Apr

Common Pipistrelle 2

Non-visual Bat Contacts - SP2

Species

Apr

Common Pipistrelle 8

date

29/07/26

drwn/chkd

CB / DC

client

Bellway Homes Ltd

project

Land at Townsend Farm,
Melksham

title

BAT FLIGHT LINE SURVEY
RESULTS PLAN - APRIL

scale

1:620 @ A3

number

FIGURE G5a

rev

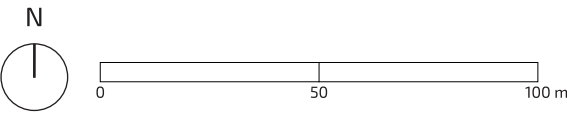
-

FPCR | environment
& design



This drawing is the property of FPCR Environment and Design Ltd and is issued on the condition it is not reproduced, retained or disclosed to any unauthorised person, either wholly or in part without written consent of FPCR Environment and Design Ltd

Ordnance Survey material - Crown Copyright. All rights reserved. Licence Number: 100019980 (Centremapslive.com)



- Site Boundary
- Walked Transect Route

Bat Species

- Pippip

date 29/07/26 drwn/chkd GA / DC

client Bellway Homes Ltd
project Land at Townsend Farm, Melksham

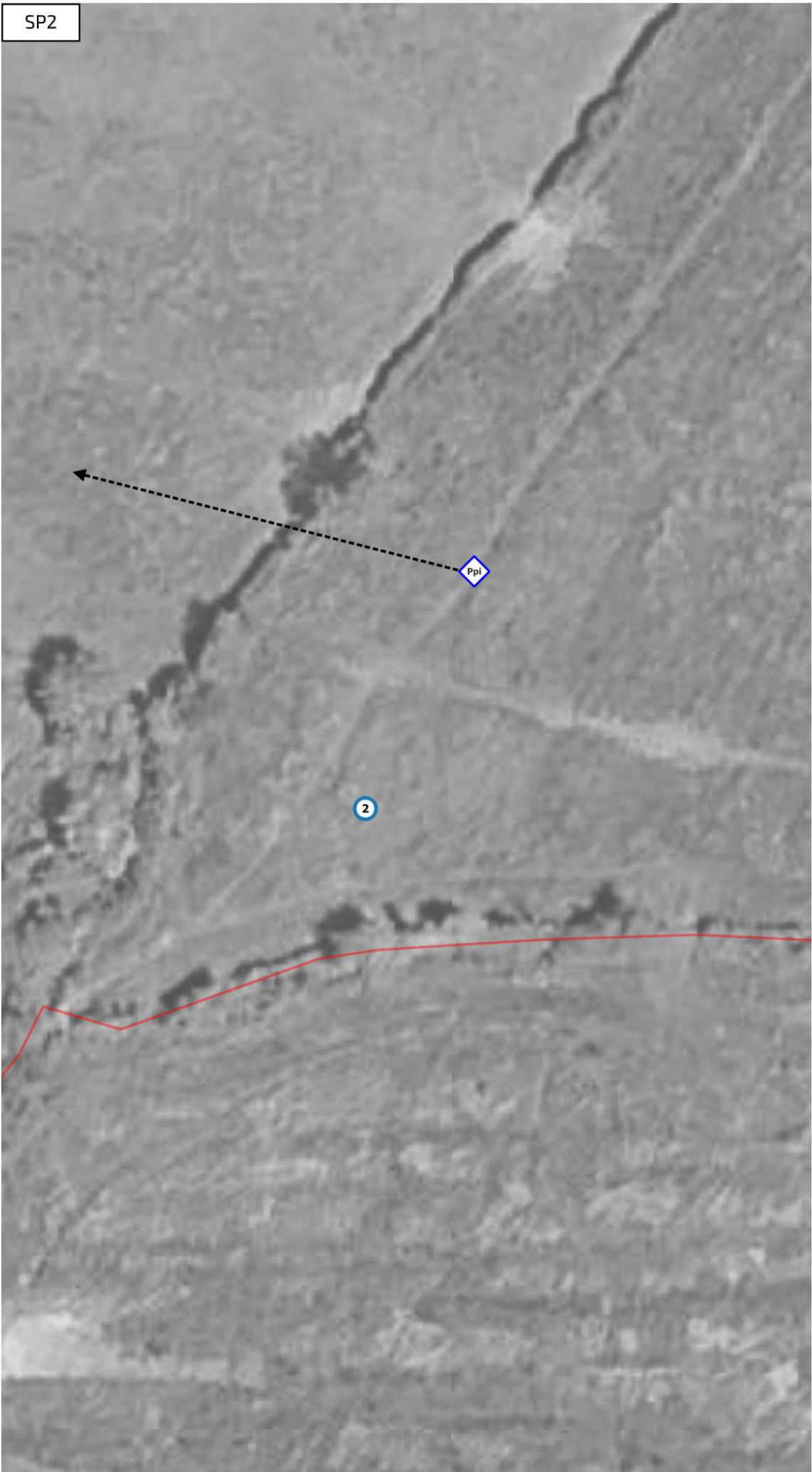
title BAT TRANSECT SURVEY PLAN - APRIL scale 1:1,727 @ A3

number FIGURE G5b rev -

FPCR | environment & design



This drawing is the property of FPCR Environment and Design Ltd and is issued on the condition it is not reproduced, retained or disclosed to any unauthorised person, either wholly or in part without written consent of FPCR Environment and Design Ltd
Ordnance Survey material - Crown Copyright. All rights reserved. Licence Number: 100019980 (Centremapslive.com)



L:\13700\13770\GIS\C - Bats\Bat Transect Template - Sonobat\13770 Flightlines April - Copy.qgz

t: 01509 672772 e: mail@fpcr.co.uk w: www.fpcr.co.uk

N

0

15

30 m

Site Boundary

Surveyor Locations
(with reference)

Bat Contacts

May

Behavioural Observation Arrows

Commuting

Species

Non-visual Bat Contacts - SP1

Species May

Non-visual Bat Contacts - SP2

SpeciesMay

Serotine1

Common Pipistrelle2

date

29/07/26

drwn/chkd

CB / DC

client

Bellway Homes Ltd

project

Land at Townsend Farm,
Melksham

title

BAT FLIGHT LINE SURVEY
RESULTS PLAN - MAY

scale

1:620 @ A3

number

FIGURE G6a

rev

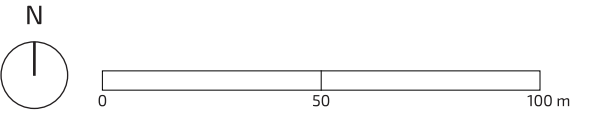
-

FPCR | environment
& design



This drawing is the property of FPCR Environment and Design Ltd and is issued on the condition it is not reproduced, retained or disclosed to any unauthorised person, either wholly or in part without written consent of FPCR Environment and Design Ltd

Ordnance Survey material - Crown Copyright. All rights reserved. Licence Number: 100019980 (Centremapslive.com)



Site Boundary

Transect Route

Bat Species

- Barbar
- Eptser
- NycEpt
- Pippip
- Pippy

date
29/07/26

drwn/chkd
CB / DC

client
Bellway Homes Ltd

project
**Land at Townsend Farm,
Melksham**

title
**BAT TRANSECT SURVEY PLAN -
MAY**

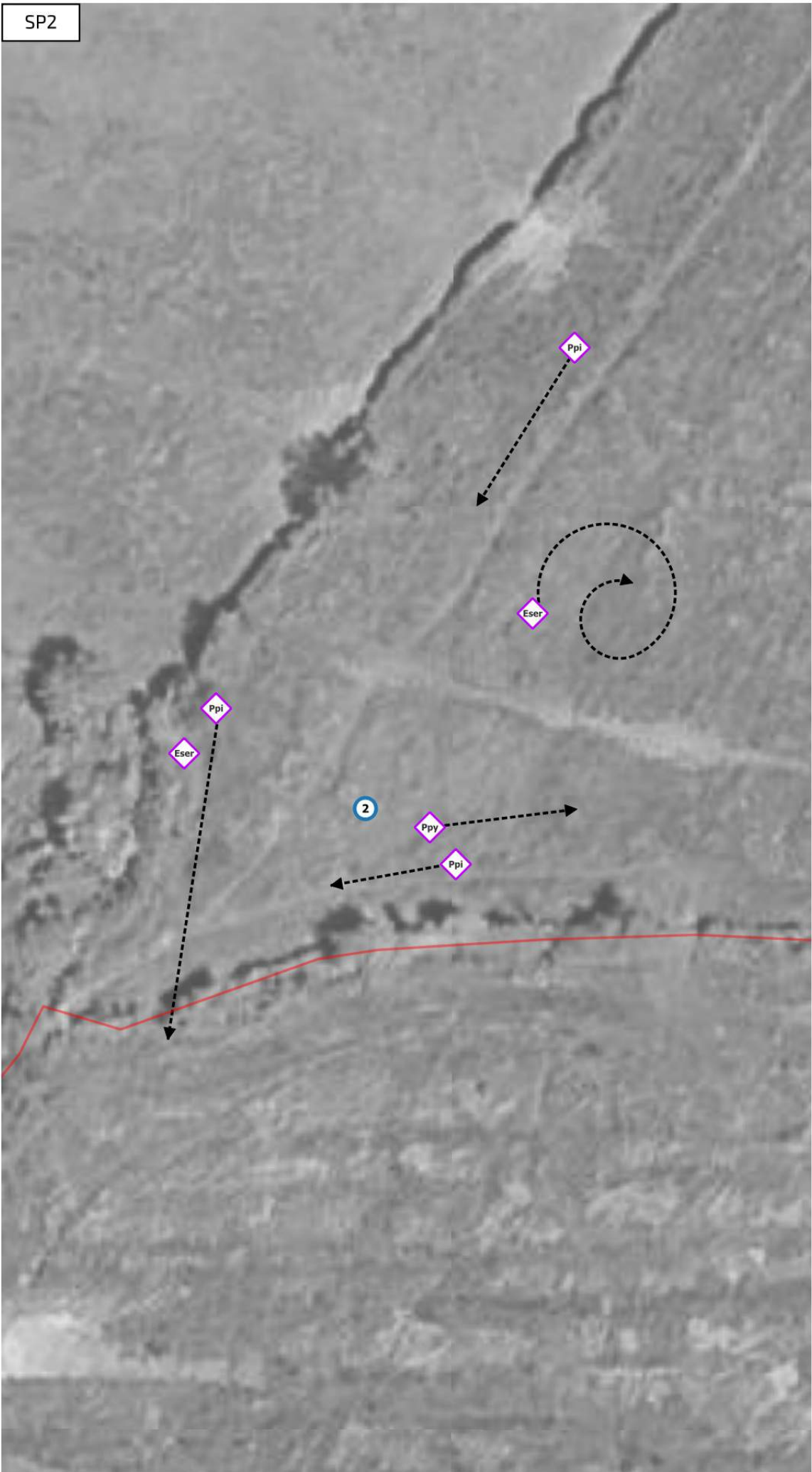
scale
1:1,727 @ A3

number
FIGURE G6b

rev
-



This drawing is the property of FPCR Environment and Design Ltd and is issued on the condition it is not reproduced, retained or disclosed to any unauthorised person, either wholly or in part without written consent of FPCR Environment and Design Ltd
Ordnance Survey material - Crown Copyright. All rights reserved. Licence Number: 100019980 (Centremapslive.com)



L:\13700\13770\GIS\C - Bats\Bat Transect Template - Sonobat\13770 Flightlines April - Copy.qgz

t: 01509 672772 e: mail@fpcr.co.uk w: www.fpcr.co.uk

N

01530m

Site Boundary

Surveyor Locations
(with reference)

Bat Contacts

July

Behavioural Observation Arrows

Commuting

Species

Ppi

Common pipistrelle

Ppy

Soprano pipistrelle

Eser

Serotine

Ppy

Soprano pipistrelle

Non-visual Bat Contacts - SP1

Species

July

Common Pipistrelle

1

Myotis Species

1

Noctule

1

Non-visual Bat Contacts - SP2

Species

July

Common Pipistrelle

2

date

29/07/26

drwn/chkd

CB / DC

client

Bellway Homes Ltd

project

Land at Townsend Farm,
Melksham

title

BAT FLIGHT LINE SURVEY
RESULTS PLAN - JULY

scale

1:620 @ A3

number

FIGURE G7a

rev

-

FPCR

environment
& design



Site Boundary

Transect Route

Bat Species

- Eptesicus
- Myotis
- Nyctalus
- Nyccterus
- Pippip
- Pippyg

date	29/07/26	drwn/chkd	CB / DC
client	Bellway Homes Ltd		
project	Land at Townsend Farm, Melksham		
title	BAT TRANSECT SURVEY PLAN - JULY	scale	1:1,714 @ A3
number	FIGURE G7b	rev	-

FPCR | environment
& design



APPENDIX H: BBS SURVEY REPORT

Client

Bellway Homes Ltd.

Project

Land at Townsend Farm, Melksham

Date

July 2026

CONTENTS

1.0	INTRODUCTION	ERROR! BOOKMARK NOT DEFINED.
2.0	LEGISLATION & STATUS	1
3.0	METHODOLOGY	3
4.0	RESULTS	5

TABLES

Table 1: Survey Dates and Weather Conditions

Table 2: Evaluation Criteria

Table 3: Species of Conservation Importance On-Site and Breeding Status

FIGURES

Figure H1: Breeding Bird Survey Results Plan A

Rev	Issue Status	Prepared/Date	Approved/Date
-	Final	JS/ 28.07.2026	DC / 28.07.2026

1.0 INTRODUCTION

- 1.1 The following report has been prepared by FPCR Environment & Design Ltd (FPCR) on behalf of Bellway Homes Limited. Its purpose is to present the results of breeding bird survey completed for a planning application for land at Townsend Farm, Melksham (Central OS Grid Ref: ST 89945 62637), herein referred to as 'the Site'.
- 1.2 This report supports an Ecological Impact Assessment (EcIA) prepared for the outline planning application. The EcIA report contains the Site context, proposals, broader ecological information and impact assessment for the Site. This report contains the methodology, results, plans and relevant technical information.

Site Proposals

- 1.3 *Outline application for up to 225 dwellings, with access from Semington Road, along with public open space and landscape buffers to incorporate existing rights of way and to accommodate the route of the proposed Melksham Link Canal (under separate application W/12/01080/FUL). Demolition and clearance of all existing buildings and structures on the site. All matters reserved other than vehicular access from Semington Road.*

2.0 LEGISLATION & STATUS

Legislation

- 2.1 Annex 1 of the EC Birds Directive lists rare and vulnerable species of regularly occurring or migratory wild birds that are subject to special conservation measures. The Directive also provides for the designation of Special Protection Areas (SPA) for the protection of these species which form part of the Natura 2000 networks of sites protected by European Wildlife Legislation.
- 2.2 The Wildlife and Countryside Act 1981 (as amended) is the principal legislation affording protection to UK wild birds. Under this legislation all birds, their nests and eggs are protected by law and it is an offence, with certain exceptions to:
- 2.3 Kill, injure or take any wild bird intentionally.
- 2.4 Take, damage or destroy the nest of any wild bird while in use or being built; or
- 2.5 Take or destroy the egg of any wild bird.
- 2.6 Additional protection is afforded to species listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended), whereby intentional disturbance whilst building or occupying a nest or disturbance of dependent young is considered an offence. The Natural Environment and Rural Communities (NERC) Act 2006 strengthens the WCA further with respect to the protection of the nests of certain birds listed on Schedule ZA1, even when they are not in use. The NERC Act also offers additional protection to birds released into the wild as part of a repopulation programme.
- 2.7 Certain species have also been identified as species of principal importance under Section 41 of the NERC Act 2006 (NERC S.41). The S41 list is used to guide decision-makers such as public bodies, including local and regional authorities, in implementing their duty under Section 40 of

the Natural Environment and Rural Communities Act 2006, to have regard to the conservation of biodiversity in England, when carrying out their normal functions.

Status

- 2.8 In addition to statutory protection, some bird species are classified according to their conservation status, such as their inclusion on the Red and Amber lists of Birds of Conservation Concern (BoCC) in the UK¹:
- 2.9 Red list (high conservation concern) species are those that are globally threatened according to IUCN criteria; those whose population has declined rapidly (50% or more) in recent years; and those that have declined historically and not shown a substantial recent recovery.
- 2.10 Amber list (medium conservation concern) species are those with an unfavourable conservation status in Europe; those whose population or range has declined moderately (between 25% and 49%) in recent years; those whose population has declined historically but made a substantial recent recovery; rare breeders; and those with internationally important or localised populations.
- 2.11 Green list (low conservation concern) species fulfil none of the above criteria.

¹ Stanbury, A., Eaton, M., Aebischer, N., Balmer, D., Brown, A., Douse, A., Lindley, P., McCulloch, N., Noble, D., and Win I. 2021. The status of our bird populations: the fifth Birds of Conservation Concern in the United Kingdom, Channel Islands and Isle of Man and second IUCN Red List assessment of extinction risk for Great Britain. British Birds 114: 723-747

3.0 METHODOLOGY

Breeding Bird Survey

- 3.1 One scoping breeding bird survey was undertaken on 11th May 2026. The survey methodology employed was broadly based on that of territory mapping, as developed by the British Trust for Ornithology (BTO) (Bibby *et al.* 2000)². All birds encountered (both seen or heard) were recorded on a field survey plan using standard BTO species codes and symbols to denote bird sex, age, and behaviour, wherever appropriate.
- 3.2 The site was walked during the morning by an experienced ecologist, between sunrise and 08:00. A route was mapped out prior to the survey being undertaken, with particular attention paid to linear features, such as hedgerows and tree lines, as well as other natural features, such as areas of scrub or waterbodies.
- 3.3 The criteria used in the assessment of breeding birds has been adapted from the standard criteria proposed by the European Ornithological Atlas Committee (EOAC 1979)³ and are grouped into four categories:
- Non-breeder e.g. flyover or observed in unsuitable habitat.
 - Possible breeder e.g. birds observed in suitable habitat, or a singing male recorded.
 - Probable breeder e.g. pair in suitable habitat, territory defence, agitated behaviour or nest building.
 - Confirmed breeder e.g. recently fledged young observed, adult birds carrying food for young.
- 3.4 The surveys were conducted to ascertain the sites' potential to support breeding populations of bird species that have been assessed to be of some conservation importance, including those included on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended), Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 and/or Birds of Conservation Concern (BoCC) Red or Amber lists⁴. These species are likely to be at greatest threat in relation to further decline and are commonly referred to as 'notable' species.
- 3.5 The surveys were not undertaken in unfavourable conditions such as heavy rain or strong wind, which may negatively affect the results (*Table 1*).

² Bibby, C.J., N.D. Burgess & D.A. Hill, (2000). Bird Census Techniques: 2nd Edition. London: Academic Press.

³ EOAC (1979) *Categories of Breeding Bird Evidence*. European Ornithological Atlas Committee.

⁴ Eaton, M., Aebischer, N., Brown, A., Hearn, R., Lock, L., Musgrove, A., Noble, D., Stroud, D. & Gregory, R. (2015) Birds of Conservation Concern 4: the population status of birds in the UK, Channel Islands and Isle of Man. *British Birds*, 108: 708-746.

Table 1: Survey Dates and Weather Conditions

Date	Start Time	End Time	Temperature (Celsius)	Cloud Cover (%)	Rain	Wind (Beaufort scale)
11 th May 2026	05:24	08:00	7	0	0	1

Assessment Methodology

- 3.6 The conservation value of bird populations was measured using two separate approaches: nature conservation value and conservation status.
- 3.7 The CIEEM guidance on Ecological Impact Assessment (EcIA) assesses nature conservation value within a geographical context. To attain each level of value, an ornithological resource or one of the features (species population or assemblage of species) should meet the criteria set out in Table 2. In some cases, professional judgement may be required to increase or decrease the allocation of the specific value, based upon local knowledge.
- 3.8 In order for a species to obtain a conservation value as Local Level or higher, they must regularly occur in sustainable populations within the site boundaries.
- 3.9 The most recent annual bird report for Wiltshire was then consulted to inform the conservation status of species within the county.

Table 2: Evaluation Criteria

Nature Conservation Value	Selection Criteria
International	- A species which is part of the cited interest of a SPA and which regularly occurs in internationally, or nationally important numbers. - A species present in internationally important numbers (>1% of international population).
National	- A species which is part of the cited interest of a SSSI and which regularly occurs in nationally or regionally important numbers. - A nationally important assemblage of breeding or over-wintering species. - A species present in nationally important numbers (>1% UK population). - Rare breeding species (<300 breeding pairs in the UK).
Regional	- Species listed as Priority Species under Schedule 41 of the Natural Environment and Rural Communities (NERC) Act (2006), which are not covered above, and which regularly occurs in regionally important numbers. - Species present in regionally important numbers (>1% of regional population). - Sustainable populations of species that are rare or scarce within a region. - Species on the BoCC Red List and which regularly occurs in regionally important numbers.
County	- Species listed as Priority Species under Schedule 41 of the Natural Environment and Rural Communities (NERC) Act (2006), which are not covered above, and which regularly occurs in county important numbers - Species present in county important numbers (>1% of county population). - Sustainable populations of species that are rare or scarce within a county, or listed as priority species for nature conservation under S41 of the NERC Act. - A site designated for its county important assemblage of birds (e.g. a SINC Site). - Species on the BoCC Red List and which regularly occur in county important numbers.
Local	- Other species of conservation interest (e.g. all other species on the BoCC Red and Amber List or listed as Priority Species under Schedule 41 of the NERC Act (2006) which are not covered above) regularly occurring in locally sustainable populations. - Sustainable populations of species which are rare or scarce within the locality.
Site	Species that are common and widespread

4.0 RESULTS

Field Surveys

- 4.1 During the survey, a total of 19 bird species were recorded within and immediately adjacent to the Site (Figure H1). The assemblage was typical of agricultural grassland habitats with hedgerows, scattered trees and existing farm buildings. Several species recorded are listed as Birds of Conservation Concern (BoCC) Red or Amber List species and/or Species of Principal Importance under Section 41 of the Natural Environment and Rural Communities Act 2006.
- 4.2 The assemblage comprised common and generalist bird species such as blackbird, robin, wren, woodpigeon and chiffchaff, together with notable species including house sparrow, greenfinch, starling, stock dove and dunnock.
- 4.3 The majority of bird activity was associated with hedgerows, field boundaries and farm buildings, which provide suitable nesting and foraging opportunities. Open grassland fields within the Site were used principally for foraging and provided comparatively limited breeding habitat.
- 4.4 Figure H1 illustrates the distribution of all bird records and their breeding status classifications recorded during the survey.

Table 3: Summary of All Species Recorded on Site and Their Legal and Conservation Statuses.

Species	Legal/ Conserv ation status	Peak Count / Number of Survey Occasions Recorded	Breeding Status†	Recent Status in Wiltshire
Blackbird <i>Turdus merula</i>	BoCC Green List	1	Possible	Abundant resident breeder throughout Wiltshire. Common in gardens, farmland and woodland habitats.
Wren <i>Troglodytes troglodytes</i>	BoCC Amber List	8	Probable	Abundant resident breeder throughout the county. One of Wiltshire's commonest breeding birds.
Robin <i>Erithacus rubecula</i>	BoCC Green List	5	Probable	Abundant resident breeder and winter visitor, widespread across Wiltshire.
Woodpigeon <i>Columba palumbus</i>	BoCC Amber List	8	Probable	Very common and abundant resident breeder across Wiltshire farmland and woodland.
Swallow <i>Hirundo rustica</i>	BoCC Green List	6	Probable	Common summer migrant and breeder associated with farm buildings and rural settlements.
Goldfinch <i>Carduelis carduelis</i>	BoCC Green List	7	Possible	Common resident and breeding species that has increased considerably in Wiltshire in recent decades.
Great Tit <i>Parus major</i>	BoCC Green List	2	Possible	Abundant resident breeder throughout the county.
Greenfinch <i>Chloris chloris</i>	BoCC Red List	1	Possible	Common resident breeder but has undergone significant declines in Wiltshire and nationally owing to disease.
Long-tailed Tit <i>Aegithalos caudatus</i>	BoCC Green List	3	Confirmed	Common resident breeder associated with scrub and hedgerows.
Blue Tit <i>Cyanistes caeruleus</i>	BoCC Green List	3	Possible	Abundant resident breeder across a wide range of habitats.
Jackdaw <i>Corvus monedula</i>	BoCC Green List	1	Possible	Very common resident breeder associated with farmland, buildings and woodland edges.
Rook <i>Corvus frugilegus</i>	BoCC Amber List	1	Possible	Common resident breeder, particularly associated with agricultural landscapes and rookeries.
Magpie <i>Pica pica</i>	BoCC Green List	1	Non-breeder	Very common resident breeder throughout Wiltshire.
Dunnock <i>Prunella modularis</i>	BoCC Amber List; NERC S.41	3	Possible	Common resident breeder of gardens, hedgerows and scrub habitats.
Chiffchaff <i>Phylloscopus collybita</i>	BoCC Green List	3	Possible	Common summer migrant and breeding species, increasing within Wiltshire.
House Sparrow <i>Passer domesticus</i>	BoCC Red List; NERC S.41	1	Probable	Common resident breeder but has experienced substantial declines nationally and locally, remaining associated with buildings and settlements.
Starling <i>Sturnus vulgaris</i>	BoCC Red List;	3	Possible	Common resident breeder that has undergone significant population declines in Wiltshire and across the UK.

	NERC S.41			
Stock Dove <i>Columba oenas</i>	BoCC Amber List	1	Probable	Fairly common resident breeder, typically associated with mature trees and farmland.
White Throat <i>Sylvia communis</i>	BoCC Amber List	1	Possible	Common and widespread summer migrant breeder in Wiltshire, typically associated with hedgerows, scrub and farmland habitats.

Bird Survey Results

- 4.5 Hedgerows around the Site supported the highest diversity of breeding birds, including blackbird, robin, chiffchaff, tits, wren, goldfinch and greenfinch, providing nesting, shelter and foraging habitat.
- 4.6 Farm buildings and adjacent structures supported species associated with developed areas, notably house sparrow and swallow.
- 4.7 Species of conservation interest recorded included greenfinch and house sparrow (BoCC Red List), stock dove, woodpigeon, wren and starling (BoCC Amber List), and dunnock, which is also a Species of Principal Importance under Section 41 of the NERC Act 2006.
- 4.8 Most bird activity was concentrated along Site boundaries and retained habitat features. Open grassland fields supported low levels of breeding bird activity and are considered to provide mainly foraging habitat for common species.
- 4.9 No individual species recorded or population size is considered greater than **Site value**.

Breeding Assemblages

- 4.10 The grassland habitats were of limited suitability for breeding birds, with no evidence of breeding recorded.
- 4.11 Hedgerows and field margins supported a typical assemblage of common and widespread breeding and foraging species, including dunnock, house sparrow, greenfinch and various woodland and hedgerow birds. Although some species are of conservation interest, all are common in Wiltshire and were recorded in typical numbers for the habitats present. The Site is therefore considered to be of no more than Local importance for its breeding bird assemblage.
- 4.12 The assemblage is considered of no greater than **Local value**.

FPCR Environment and Design Ltd

Registered Office: Lockington Hall, Lockington, Derby DE74 2RH

Company No. 07128076. [T] 01509 672772 [E] mail@fpcr.co.uk [W] www.fpcr.co.uk

This report is the property of FPCR Environment and Design Ltd and is issued on the condition it is not reproduced, retained or disclosed to any unauthorised person, either wholly or in part without the written consent of FPCR Environment and Design Ltd. Ordnance Survey material is used with permission of The Controller of HMSO, Crown copyright 100019980.



N

0

50

100 m

Site Boundary

BoCC 5 Red List Species

HS House Sparrow

SG Starling

GR Greenfinch

BoCC 5 Amber List Species

D Dunnock

SD Stock Dove

WH Whitethroat

RO Rook

WP Woodpigeon

WR Wren

BoCC 5 Green List Species

B Blackbird

BT Blue Tit

CC Chiffchaff

GO Goldfinch

GT Great Tit

JD Jackdaw

LT Long-tailed Tit

MG Magpie

R Robin

SL Swallow

Fly over only

Additional Protections

NERC Species of Principal Importance

Breeding Status

Confirmed Breeder

Probable Breeder

Possible Breeder

Non-breeder

drawn date

29/07/26

client

Bellway Homes Ltd

project

Land at Townsend Farm, Melksham

title

BREEDING BIRD SURVEY RESULTS PLAN - DISTRIBUTION OF NOTABLE SPECIES

scale

1:1,868 @ A3

number

FIGURE H1

rev

-

This drawing is the property of FPCR Environment and Design Ltd and is issued on the condition it is not reproduced, retained or disclosed to any unauthorised person, either wholly or in part without written consent of FPCR Environment and Design Ltd
Contains OS Data © Crown copyright [and database rights] 2026.

L:\13700\13770\GIS\D - Birds\BoCC5 BBS Template v1.2\13770 E-XX Breeding Bird Survey Results Plan - Distribution of Notable Species.qgs
t: 01509 672772 e: mail@fpcr.co.uk w: www.fpcr.co.uk

FPCR | environment
& design



Appendix I: Reptile Survey Report

Client

Bellway Home Limited

Project

Land at Townsend Farm, Melksham

Date

July 2026

CONTENTS

1.0 NON-TECHNICAL SUMMARY ERROR! BOOKMARK NOT DEFINED.

2.0 INTRODUCTION ERROR! BOOKMARK NOT DEFINED.

3.0 LEGISLATION ERROR! BOOKMARK NOT DEFINED.

4.0 METHODOLOGY 1

5.0 RESULTS 3

6.0 IMPACT ASSESSMENT AND DISCUSSION ERROR! BOOKMARK NOT DEFINED.

7.0 CONCLUSION ERROR! BOOKMARK NOT DEFINED.

TABLES

- Table 1: Reptile Survey Dates and Weather Conditions
- Table 2: Key Reptile Site Survey Assessment Categories (HGBI 1998)
- Table 3: Summary of Desktop Study Reptile Records.
- Table 4: Summary of Reptile Survey Results

FIGURES

Figure I1: Reptile refugia locations

Rev	Issue Status	Prepared/Date	Approved/Date
A	Final	ET/ 30.06.2026	XX / XX.XX.XXXX

1.0 METHODOLOGY

Desk Study

- 1.1 To compile existing baseline information, relevant ecological information was requested from both statutory and non-statutory nature conservation organisations including:
- Wiltshire & Swindon Biological Records Centre (WSBRC).
 - Multi Agency Geographic Information for the Countryside (MAGIC - <https://magic.defra.gov.uk/MagicMap.html>)
- 1.2 Further inspection of colour 1:25,000 OS base maps (www.ordnancesurvey.co.uk) and aerial photographs from Google Earth (www.maps.google.co.uk) was also undertaken in order to provide additional context and identify any features of potential importance for nature conservation in the wider countryside.

Reptile Presence/Likely Absence Surveys

- 1.3 Artificial refugia (0.5m² sections of roofing felt) were placed throughout the survey area at a density of 10 refugia per hectare of suitable reptile habitat. These habitats included areas of scrub and borders of grassland around site. Refugia locations are shown in *Figure I1*.
- 1.4 Refugia were left to bed in for a minimum of 1-2 weeks. Then seven survey visits were undertaken by experienced FPCR ecologists between May and June 2026, following current guidelines^{1,2} and in suitable weather conditions (*Table 1*). These include air temperatures between 9-19°C in the absence of strong winds and heavy rain.
- 1.5 Each survey visit included the following:
- Checking all refugia within the survey area at least once.
 - Approaching refugia carefully from downwind and without casting a shadow so as not to disturb basking animals.
 - Lifting and replacing refugia with care to check for the presence of reptiles underneath.
 - Checking other suitable basking areas and resting places within the survey area, such as log piles.

¹ Gent, T. & Gibson, S. (eds.) (2003) *Herpetofauna Workers' Manual*. JNCC, Peterborough.

² Froglife (2016) *Surveying for reptiles: Tips, techniques and skills to help you survey for reptiles*. Froglife, Peterborough.

Table 1: Reptile Survey Dates and Weather Conditions

Date	Time	Weather Conditions
1 June 2026	PM	Overcast, bright, 16°C
5 June 2026	AM	Overcast, bright, slight drizzle towards end, 13°C

Population Assessment

- 1.6 The reptile population was assessed in accordance with the Key Reptile Site Register criteria³. This system classifies populations of individual reptile species into three population categories according to importance (Table 2). These categories are based on the peak number of adults observed during individual surveys.

Table 2: Key Reptile Site Survey Assessment Categories (HGBI 1998)

Species	Low Population – Score 1 (No. of individuals)	Good Population – Score 2 (No. of individuals)	Exceptional Population – Score 3 (No. of individuals)
Adder	<5	5 - 10	>10
Common lizard	<5	5 - 20	>20
Grass snake	<5	5 - 10	>10
Slow worm	<5	5 - 20	>20

- 1.7 To qualify for the Key Reptile Site Register, the site in question must meet at least one of the following criteria:
- Supports three or more species
 - Supports two snake species
 - Supports an exceptional population of one species (see Table 2)
 - Supports an assemblage of species scoring at least 4 (see Table 2)
 - Does not satisfy the above four points but is of particular regional importance due to local rarity (for example e.g. adders are very rare in the East Midlands of England, therefore even 'low' populations should be designated as Key Sites).

Limitations

- 1.8 There were no limitations to note which occurred during the surveys.

³ Froglife (1999) *Reptile survey: an introduction to planning, conducting and interpreting surveys for snake and lizard conservation*. Advice Sheet 10. Froglife, Peterborough.

2.0 RESULTS

Desktop Study

- 2.1 Consultation with WSBRC identified forty reptile records within 1km of the Site. This include a ten records of grass snakes and a thirty records for slow-worms, approximately 0.5km south-east of site.
- 2.2 Desk study records of reptiles are summarised in Table 3, with details of other desk study records provided in the accompanying EclA report.

Table 3: Summary of Desktop Study Reptile Records.

Species	Location	Date of Most Recent Record	Description
Grass Snake	490m SE	2019	10 records
Slow worm	490m SE	2019	30 records

Habitat Suitability Assessment

- 2.3 The Site holds some small pockets of moderate suitability habitat for reptiles, which were targeted for the survey; however, most of the site offers limited potential, due to active grazing and human activity. The margins do offer a degree of suitability as commuting habitat for reptile species such as grass snake and slow worm.

Field Surveys

- 2.4 No reptiles were recorded during the presence/likely absence surveys.
- 2.5 In accordance with Table 4 and associated Key Reptile Sites criteria, surveys have concluded that this site does not qualify as a Key Reptile Site.

Table 4: Summary of Reptile Survey Results

Date	Survey Results	Peak Count (Adults)	Other Species Recorded
1 June 2026	No reptiles found	0	None
5 June 2026	No reptiles found	0	None

FPCR Environment and Design Ltd

Registered Office: Lockington Hall, Lockington, Derby DE74 2RH
Company No. 07128076. [T] 01509 672772 [E] mail@fpcr.co.uk [W] www.fpcr.co.uk

This report is the property of FPCR Environment and Design Ltd and is issued on the condition it is not reproduced, retained or disclosed to any unauthorised person, either wholly or in part without the written consent of FPCR Environment and Design Ltd. Ordnance Survey material is used with permission of The Controller of HMSO, Crown copyright 100019980.



- Site Boundary
- Reptile Refugia Tin Locations

drawn date
29/07/26

drwn/chkd
ET/DC

client
Bellway Home Ltd

project
**Land at Townsend Farm,
Melksham**

title
**REPTILE REFUGIA LOCATION
PLAN**

scale
1:1,723 @ A3

number
FIGURE I1

rev
-

FPCR | environment
& design

FPCR | environment
& design



Appendix J: Dormouse Survey Report

Client

Bellway Homes Limited

Project

Land at Townsend Farm, Melksham

Date

July 2026

CONTENTS

1.0 NON-TECHNICAL SUMMARY 1

2.0 INTRODUCTION 2

3.0 LEGISLATION 3

4.0 METHODOLOGY 4

5.0 RESULTS 7

6.0 IMPACT ASSESSMENT AND DISCUSSION 9

7.0 CONCLUSION 13

TABLES

Table 1: Summary of Dormouse Survey Results

FIGURES

Figure J1: Footprint Tunnel Locations

Figure 2: Tables 3.6 and 3.7 from the Hazel Dormouse Mitigation Handbook (2025).

APPENDICES

Appendix J1: Photographs

Rev	Issue Status	Prepared/Date	Approved/Date
-	Draft	SKB / 28.07.2026	

1.0 NON-TECHNICAL SUMMARY

Report Scope and Methodology
FPCR were commissioned by Bellway Homes Limited to undertake dormouse surveys at Land at Broadway Lane, Bournemouth Dorset to provide an ecological baseline for the application Site. Dormouse presence/likely absence surveys commenced in June 2026 in accordance with good practice guidelines.
Survey Results
The desk study returned no nearby records of hazel dormouse from either DERC or MAGIC. Surveys are ongoing; no evidence of hazel dormouse presence has yet been recorded. The Site is farmland bound by scrub, hedgerow and woodland. Habitat suitable to support hazel dormouse is largely restricted to the boundary hedgerow and scrub, which are connected to offsite habitats within the wider landscape. Habitat quality varies across the Site; overall, the Site supports habitat of moderate suitability for hazel dormouse and forms part of a larger connected habitat network.
Assessment of Impacts
The proposed development would result in permanent loss of 490m of central hedgerows and potential for disturbance during construction activities and a risk of injury to dormice (if recorded as present) if vegetation clearance is undertaken without appropriate safeguards. Without mitigation, habitat removal and degradation would reduce the suitability of the Site and its contribution to the wider ecological network. However, the majority of the highest quality habitat can be retained and opportunities exist to improve habitat quality through habitat creation and enhancement.
Recommended Mitigation, Compensation and Enhancement
The report recommends a range of measures to ensure that impacts on hazel dormouse are avoided or reduced to acceptable levels, including ecological supervision of vegetation clearance, protection of retained habitats, and the maintenance of habitat connectivity. Any habitat losses will be compensated through the creation of new species-rich native hedgerows and enhancement of retained scrub.

2.0 INTRODUCTION

- 2.1 The following Hazel Dormouse Report has been prepared by FPCR Environment and Design Ltd. ("FPCR") on behalf of Bellway Homes Limited to inform a planning application for the development of Townsend Farm, Melksham (Central OS Grid Ref: ST 89946 62625) herein referred to as 'the Site'.
- 2.2 This Dormouse Report accompanies an Ecological Impact Assessment (EclA) prepared for the planning application. The EclA contains broader ecological information and assessment for the Site, the site context and proposals, and therefore, this report should be read in conjunction with it.

Site Location Context

- 2.3 The Site comprises approximately 11 hectares of agricultural land located at Townsend Farm, Melksham. Residential development is currently under construction immediately north of the Site, while planning permission has recently been granted for residential development on adjoining land to the south. Semington Road and associated settlement lie along the eastern boundary, while Berryfield Lane forms the western boundary, beyond which is agricultural land.
- 2.4 The Site is predominantly an active cattle farm comprising three large pastoral field parcels and an associated farmstead containing a number of agricultural buildings, several of which are no longer in active use. The southern and south-western parts of the Site are managed separately and include a horse paddock, derelict former poultry sheds, an active storage compound, and a small livestock enclosure with associated buildings. Boundaries are defined primarily by hedgerows, with mature trees along the northern boundary and residential properties adjoining the eastern and western boundaries. Remnant buildings associated with the Site's former use as a World War II airfield also remain within the Site.

Site Proposals

- 2.5 *Outline application for up to 225 dwellings, with access from Semington Road, along with public open space and landscape buffers to incorporate existing rights of way and to accommodate the route of the proposed Melksham Link Canal (under separate application W/12/01080/FUL). Demolition and clearance of all existing buildings and structures on the site. All matters reserved other than vehicular access from Semington Road.*

Report Aims and Objectives

- 2.6 The report has been prepared to achieve the following objectives:
- Summarise the survey and assessment methodologies employed in order to assess the importance of the Site for hazel dormice
 - Provide the desk study records of dormice within a 2km radius of the Site
 - Provide the results of dormouse surveys undertaken
 - Assess the likelihood of dormice being present onsite
 - Provide recommendations for avoidance, mitigation, compensation and/or enhancement to mitigate impacts of the proposals on dormice

3.0 LEGISLATION

3.1 The hazel dormouse *Muscardinus avellanarius* is legally protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and is a European Protected Species (EPS) under the Conservation of Habitats and Species Regulations 2017 (as amended). In summary, it is an offence to:

- Intentionally or deliberately kill, injure or capture dormice
- Intentionally, deliberately or recklessly disturb dormice in such a way as to significantly affect their ability to survive, breed, rear/nurture their young or significantly affect their local distribution or abundance
- Intentionally or recklessly damage, destroy or obstruct access to places used by dormice for shelter and protection (whether occupied or not)
- Intentionally or recklessly disturb a dormouse whilst occupying a place of shelter or protection
- Damage or destroy a dormouse breeding site or resting place
- Possess or transport a dormouse (or any part thereof) unless under licence
- Sell or exchange dormice

3.2 The hazel dormouse is also a species of principal importance for the conservation of biodiversity under Section 41 (S41) of the Natural Environment and Rural Communities (NERC) Act 2006.

3.3 Proposals that could lead to any of the above offences would require a mitigation licence from Natural England, alongside appropriate avoidance, mitigation and compensation measures.

3.4 The impact that the above legislation has on the planning system is outlined in ODPM 06/2005 Government Circular: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System. This states:

"The presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat. Local authorities should consult English Nature [now Natural England] before granting planning permission. They should consider attaching appropriate planning conditions or entering into planning obligations under which the developer would take steps to secure the long-term protection of the species. They should also advise developers that they must comply with any statutory species' protection provisions affecting the site concerned."

4.0 METHODOLOGY

Desk Study

4.1 In order to compile existing baseline information, relevant ecological information was requested from both statutory and non-statutory nature conservation organisations including:

- Wiltshire & Swindon Biological Records Centre (WSBRC)
- Multi Agency Geographic Information for the Countryside (MAGIC)

4.2 Inspection of colour 1:25,000 OS base maps (www.ordnancesurvey.co.uk) and aerial photographs from Google Earth (www.maps.google.co.uk) was undertaken to provide additional context and identify any features of potential importance for nature conservation in the wider countryside.

Field Surveys

4.3 Dormouse surveys were undertaken in accordance with current best practice guidelines^{1,2} by suitably experienced FPCR ecologists.

Habitat Suitability Assessment

4.4 During the initial site assessment, the hedgerows and scrub habitats were evaluated in accordance with guidance. The assessment considered habitat type and extent, plant species diversity, shrub layer quality, structural diversity, habitat connectivity, and management condition. Full details of the hedgerows are provided in the EcIA (FPCR, 2026).

4.5 Records were made of the presence and distribution of woodland, scrub and hedgerow habitats both within the site and in the surrounding area. Plant species diversity was assessed, together with the potential for the vegetation to provide a succession of food resources, including flowers, insects, fruits and nuts, throughout the active season. Habitat structure was also evaluated, with particular regard to the development of understorey, shrub and canopy layers.

4.6 Habitat connectivity was assessed to determine the extent to which habitats were linked both within the site and to surrounding woodland, scrub and hedgerow networks in the wider landscape.

4.7 Habitat management condition was recorded, including evidence of positive management practices such as coppicing, as well as factors that may reduce habitat suitability, including excessive shading, limited regeneration, intensive hedge management and signs of significant deer browsing.

Presence/Likely Absence Surveys

Footprint Tunnel Surveys

4.8 Dormouse footprint tunnels use ink and card to record the footprints of any animals travelling through the tube. Dormouse footprints are distinctive from other small mammal footprints due to their triangular-shaped palm pads on both the front and hind feet.

¹ Bullion, S., Wolton, R. & White, I. (2025) *Hazel Dormouse Conservation Handbook – Third edition*. The Mammal Society.

² Wells, D., Chanin, P. & Gubert, L. (2025) *Hazel Dormouse Mitigation Handbook*. The Mammal Society.

4.9 Footprint tunnels were installed every 15–20m on horizontal branches in suitable habitat. A total of 50 tunnels were installed on 1st June 2026. Locations are shown in *Figure J1*. The tunnels were left for two weeks to allow neophobia to subside. The tunnels are being re-inked and re-carded at two-week intervals from 8th June 2026 onwards to achieve a detection probability of $\geq 97\%$.

4.10 The cards from within the tunnels are collected to allow for footprint identification.

Habitat Quality Assessment

4.11 Presence/likely absence surveys are ongoing. Should the surveys confirm presence of hazel dormouse, the habitats should be assessed for their quality in terms of supporting a population of hazel dormouse in line with best practice guidelines set out by The Mammal Society (2025). The assessment includes recording the diversity of food sources, vegetation structure, and connectivity by identifying features such as:

- Preferred nesting locations in unenclosed situations amongst favoured vegetation comprising bramble, blackthorn *Prunus spinosa* and rose thickets, and holly and gorse bushes.
- Potential enclosed nest locations such as cavities in trees (rot holes, cracks, splits, and lifted bark)
- Plant species and habitats that provide good quality food throughout the active period (March to November) including a range of flowers, berries and nuts.
- Plant species and habitats that support a range of invertebrates.

Estimating Dormouse Density from Habitat

4.12 Should hazel dormouse be recorded on site, the density of the population can be estimated based on structural complexity and the diversity of favourable species.

4.13 Following the method set out in the Hazel Dormouse Mitigation Handbook (2025) the species diversity and structural complexity of hedgerows, woodland and scrub are rated as high, medium or low and a standardised density is assigned per hectare/kilometre. For example, woodland or scrub habitat with high diversity and high complexity is assumed to support 10 breeding adults per hectare. A hedgerow with low diversity and low complexity is assumed to support 1 breeding adult per kilometre; see *Figure 2* below.

Quality assessment

Table 3.6 The relationship between species diversity, structural complexity and habitat quality.

		Diversity		
		High	Medium	Low
Complexity	High	Excellent	Good	Fair
	Medium	Good	Good	Poor
	Low	Fair	Poor	Poor

Estimated density of dormice

Table 3.7 Relationship between habitat quality and dormouse density in terms of numbers of breeding adults; (n km-1 in hedgerow and n ha-1 in woodland/scrub).

Quality	Hedgerow	Woodland/ Scrub
Excellent	8	10
Good	5	6
Fair	3	4
Poor	1	2

Figure 2: Tables 3.6 and 3.7 from the Hazel Dormouse Mitigation Handbook (2025) showing the relationship between species diversity, structural complexity and habitat quality, and the subsequent estimated density of dormice.

Limitations

- 4.14
- The dormouse footprint tunnel re-inking interval was extended in June to three weeks from the standard two-week cycle due to survey cancellation, but this deviation is not expected to affect overall results as the week will be discounted and end time extended by the same length of time.

5.0 RESULTS

Desktop Study

- 5.1 Data obtained in 2026 from WSBRC did not identify any records of hazel dormice within 2km of the site.
- 5.2 A search of MAGIC in June 2026 did not identify any previously granted European Protected Species Licences (EPSLs) for hazel dormice within 2km of the site. The closest EPSL was approximately 4.81km North (2014-3808-EPS-MIT); connectivity of suitable dormouse habitat between this record and the site is limited due to the presence of residential development and major roads, which form barriers to ease of dispersal.

Field Surveys

Habitat Suitability Assessment

- 5.3 The Site supports mature trees along most hedgerow boundaries, with a small area of mixed woodland present in the southwest of the Site. The grassland that comprises most of the Site contributes little to overall suitability and the assessment is therefore driven by the quality, structure and connectivity of the woody habitats.
- 5.4 Habitat suitability is greatest where woody vegetation provides a combination of food resources, nesting opportunities and connected arboreal pathways. The Site supports habitat suitable for hazel dormouse, principally associated with the boundary hedgerow, scrub and woodland network. The hedgerows provide woody linear habitat with the potential to support hazel dormouse, particularly in the south of the Site. Most of the northern hedges were species poor, gappy and thin limiting the overall suitability of the Site for dormice.
- 5.5 The Site exhibits some functional connectivity. Boundary hedgerows and woodland are linked to adjoining hedgerows immediately north and south of the Site. Connectivity into the wider network of hedgerows, tree lines and woodland is somewhat limited by the presence of Berryfield Lane to the west and south, Semington Road to the east, and the A350 to the north. Beyond to the east is a network of mixed farmland with connected hedgerows.
- 5.6 Overall, the Site supports habitat of moderate suitability for hazel dormouse. The assessment is based on the presence of continuous, connected woody habitats containing a range of native shrub and tree species capable of providing food resources throughout the active season, together with dense scrub suitable for nesting. Suitability is moderated by the limited width and structural complexity of some of the hedgerow network and breaks in offsite connectivity due to roads surrounding the Site.

Presence/Likely Absence Surveys

- 5.7 As the habitats on Site and nearby were assessed as holding potential to support hazel dormouse, presence/likely absence surveys undertaken at the Site in the form of footprint tunnel surveys, which are ongoing.
- 5.8 The results are summarised in Table 1 and the location of evidence recorded is shown in *Figure J1*. The evidence was recorded along the southern boundary hedgerows/scrub.

Table 1: Summary of Dormouse Survey Results

Survey	Date	Survey Results
-	1 st June 2026	Footprint tunnels deployed.
1	8 th June 2026	No evidence recorded.
2	23 rd June 2026	No evidence recorded.
3	6 th July 2026	No evidence recorded.
4	20 th July 2026	No evidence recorded.
5		
6		

6.0 IMPACT ASSESSMENT AND DISCUSSION

- 6.1 Hazel dormouse are currently not confirmed to be present within the Site during the ongoing survey effort. The Site supports a network of scrub, hedgerow and woodland habitats which form part of a wider connected habitat network extending beyond the Site boundaries.
- 6.2 Proposals for the construction of up to 225 dwellings along with public open space and landscape buffers include the retention of the majority of hedgerows and trees and loss of the grassland within the field parcels. Most of the grassland is not of notable value to hazel dormouse due in part to its management.
- 6.3 The proposal includes a range of habitat creation measures as part of the green infrastructure

Impact Assessment

- 6.4 Site proposals will result in the permanent loss of a total 490m of central hedgerows, including the complete loss of H7 and partial loss of H8 (full hedgerow details and locations are provided in the EcIA (FPCR, 2026)). Hedgerow H7 is a UK BAP Priority Habitat native hedgerow with trees measuring 279m. The shrub layer comprises blackthorn, hawthorn *Crataegus monogyna*, elder *Sambucus nigra*, and dogwood *Cornus sanguinea*, with semi-mature eared willow *Salix aurita* and ash *Fraxinus excelsior* specimens. Hedgerow H8 is also a UK BAP Priority Habitat native hedgerow with trees and currently measures 139m, two thirds of which will be lost to the proposals. The hedgerow is thin and over-trimmed with a shrub layer comprising eared willow, hawthorn, blackthorn and dog rose *Rosa canina*. Mature crack willow *Salix fragilis* and ash are also present.
- 6.5 Should hazel dormouse be present onsite, the loss of hedgerow will reduce connectivity, foraging opportunities, invertebrate prey availability, nesting locations, and nest construction materials. Habitat loss would therefore reduce the carrying capacity of the Site.
- 6.6 In the absence of mitigation, site clearance works have the potential to result in the killing or injury of dormice as well as disturbance and destruction of resting places. Vegetation clearance presents a risk of direct harm to individual dormice. Hazel dormice construct summer nests within dense scrub and hedgerow vegetation and may occupy these habitats throughout the active season. Dormice may also occasionally utilise dense vegetation close to ground level during periods of torpor. Consequently, uncontrolled vegetation clearance has the potential to result in injury or mortality of animals occupying nests or sheltering within habitat scheduled for removal.
- 6.7 In addition to habitat loss, construction activities have the potential to cause disturbance to dormice occupying retained habitat. Increased noise, vibration, human activity and the operation of machinery may temporarily displace animals from favoured foraging areas and nesting locations. While dormice are generally tolerant of low levels of disturbance within occupied landscapes, prolonged or intensive construction activity immediately adjacent to retained habitat may reduce habitat use during the construction period.
- 6.8 Construction activities also have the potential to indirectly affect retained habitats. Accidental damage caused by vehicle movements, storage of materials, excavation works or changes to local hydrology could reduce the quality of retained hedgerows and scrub. Similarly, artificial lighting introduced during construction may reduce the suitability of retained commuting routes, particularly where illumination affects dense boundary vegetation.

- 6.9 During the operational phase impacts could arise through increased recreational activity, inappropriate management of retained vegetation, artificial lighting and the introduction of non-native garden species. In particular, the continued spread of cherry laurel within retained habitats could reduce woody species diversity and gradually diminish habitat quality through the displacement of native shrubs that provide important dormouse food resources. Increased lighting of retained habitat corridors could also discourage dormouse movement and reduce the effectiveness of habitat connections that currently extend through the Site and into the wider landscape.
- 6.10 The retention and protection of existing habitat corridors should form a central component of the mitigation strategy. All retained scrub, hedgerow and woodland should be protected throughout the construction period using suitable exclusion fencing and clearly defined ecological protection zones. Construction compounds, storage areas and vehicle movements should be located away from retained habitats to prevent accidental damage and degradation.
- 6.11 Particular emphasis should be placed on maintaining habitat connectivity throughout the Site. Retained hedgerows should remain connected to each other and adjoining off-site habitats.

Mitigation

European Protected Species Mitigation Licensing

- 6.12 Given the current lack of field records, it has been determined that an offence under Wildlife & Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 (as amended) is not reasonably likely to occur. Therefore, a European Protected Species (EPS) mitigation licence from Natural England is not required. However, should field evidence be identified, the potential impacts will be reassessed, and an EPS mitigation licence shall be needed.
- 6.13 Detailed precautionary working measures will be employed during habitat removal, including appropriate timings and methods that must be conducted under the supervision of a suitably experienced Ecological Clerk of Works (ECOW).

Compensatory Planting

- 6.14 Any suitable hazel dormouse habitat impacted by the development will be compensated with habitat creation designed not only to replace habitat losses on a minimum 1:1 basis, but to improve overall habitat quality, including infilling gaps in retained hedgerows and improved and targeted management.
- 6.15 New hedgerows should comprise a diverse mix of native woody species known to provide dormouse food resources throughout the active season, including hazel *Corylus avellana*, hawthorn *Crataegus monogyna*, blackthorn, field maple *Acer campestre*, dog rose, guelder rose *Viburnum opulus*, holly *Ilex aquifolium* and spindle *Euonymus europaeus*. A full list of species suitable to create and enhance habitats for hazel dormouse is provided in the Hazel Dormouse Mitigation Handbook (2025). The inclusion of these species would increase the seasonal availability of flowers, fruits, berries and nuts.

Construction Phase

- 6.16 Vegetation clearance should be undertaken under ecological supervision using a precautionary staged approach designed to minimise the risk of injury to dormice.

- 6.17 Timings will depend on the project schedule. Optimal timings for vegetation removal are April-May and mid-September-October (weather dependent) when hazel dormouse are active but not breeding. If winter works are required, then a two-stage cut is best practice. This involves a first cut to above ground level between November-March to avoid hibernating dormice at ground level, followed by a second cut and stump removal in April-May.
- 6.18 Habitats scheduled for removal should initially be cut to a height that renders them unsuitable for nesting while retaining sufficient cover to allow any animals present to disperse naturally into adjacent retained habitat. Following an appropriate period, vegetation can then be removed fully under ecological supervision. Clearance should be undertaken progressively towards retained habitats to encourage movement into adjoining suitable vegetation and avoid trapping animals within isolated patches of habitat.

Habitat Protection

- 6.19 The retention and protection of existing habitat corridors forms the central component of the mitigation strategy. All retained scrub, hedgerow and woodland should be protected throughout the construction period using suitable exclusion fencing and clearly defined ecological protection zones. Construction compounds, storage areas and vehicle movements should be located away from retained habitats to prevent accidental damage and degradation.
- 6.20 Hazel dormouse are largely nocturnal, therefore construction work will take place during daylight hours only, where possible. Where nocturnal works cannot be avoided, artificial light will avoid dormouse habitats.

Operational Phase

- 6.21 A sensitive lighting strategy should be incorporated into the development design. Lighting columns should be located away from retained habitat corridors and luminaires should be designed to direct artificial light away from scrub, hedgerows and woodland. Retained commuting routes should remain substantially dark in order to maintain their functionality for dormouse. The lighting scheme should be devised through consultation with an ecologist, and with regard to guidance from the Institute of Lighting Professionals (ILP) on reducing artificial lighting at night.

Enhancements

- 6.22 The Site will be enhanced through supplementary native shrub planting to increase both species diversity and structural complexity. The proposals will include enhancement of retained hedgerows with infill planting including thorny species, such as blackthorn, hawthorn, and dog rose, to discourage human and cat disturbance and provide added protection for dormice. General landscape planting throughout the scheme will include a mix of native shrub and tree species to increase the seasonal availability of flowers, fruits, berries and nuts, which will benefit all wildlife utilising the Site.
- 6.23 Any new native hedgerows will be subject to a sympathetic management scheme. The hedgerows will include a variety of native species and will be cut on a rotational basis to ensure flowers and fruits are available each year for foraging. This will provide enhanced habitat for hazel dormouse whilst maintaining connectivity to the wider area. Management should seek to maintain species diversity, encourage structural complexity and prevent the encroachment of invasive non-native species.

- 6.24 The establishment of wide tussocky grassland margins adjacent to retained and newly planted hedgerows would provide additional habitat diversity and contribute nesting materials, invertebrate prey resources and potential hibernation habitat. These areas should be managed sensitively to maintain a structurally diverse transition between woody vegetation and adjacent grassland.

7.0 CONCLUSION

- 7.1 The ongoing targeted survey has not yet demonstrated that the habitats on the Site support hazel dormouse. If the species is recorded, it is likely to utilise the network of scrub, hedgerow and woodland habitats that form part of a wider connected landscape.
- 7.2 The proposed development includes the retention of suitable hedgerow and woodland habitat. There is the potential to cause disturbance to dormice during construction and operation.
- 7.3 Should hazel dormouse be confirmed as present onsite, the impacts can be effectively avoided and mitigated through implementation of a site-specific Precautionary Working Method Statement, ecological supervision of habitat removal, protection of retained habitats, maintenance of commuting routes and the provision of compensatory habitat planting. The retention and enhancement of habitats, together with the creation of new species-rich hedgerows and long-term habitat management, will strengthen habitat connectivity and improve habitat quality across the Site.
- 7.4 Subject to implementation of the mitigation and enhancement measures described within this report and accompanying Ecological Impact Assessment (EcIA) report, the development is not expected to result in significant adverse effects on the local dormouse population. Furthermore, the proposed habitat enhancements have the potential to deliver a measurable improvement in habitat quality, species diversity and structural complexity when compared with the existing baseline conditions.

APPENDIX J1: PHOTOGRAPHS

Site Photographs

Examples of potential hazel dormouse habitat onsite



Photograph 1: Hedgerow H1.



Photograph 2: Hedgerow H8 will be partially lost to the proposal



Photograph 3: Linear scrub habitat.

FPCR Environment and Design Ltd

Registered Office: Lockington Hall, Lockington, Derby DE74 2RH

Company No. 07128076. [T] 01509 672772 [E] mail@fpcr.co.uk [W] www.fpcr.co.uk

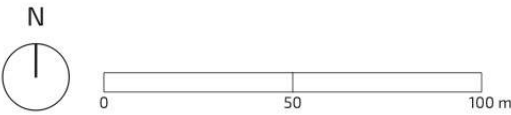
This report is the property of FPCR Environment and Design Ltd and is issued on the condition it is not reproduced, retained or disclosed to any unauthorised person, either wholly or in part without the written consent of FPCR Environment and Design Ltd. Ordnance Survey material is used with permission of The Controller of HMSO, Crown copyright 100019980.



L:\13700\13770\GIS\I - Dormouse\XXXX-E-XX Site Location.qgs
t: 01509 672772 e: mail@fpcr.co.uk w: www.fpcr.co.uk

This drawing is the property of FPCR Environment and Design Ltd and is issued on the condition it is not reproduced, retained or disclosed to any unauthorised person, either wholly or in part without written consent of FPCR Environment and Design Ltd

Ordnance Survey material - Crown Copyright. All rights reserved. Licence Number: 100019980 (Centremapslive.com)



Notes:

- Site Boundary
- Dormouse Tube Location

drawn date	29/07/26	drwn/chkd	ET/DC
client	Bellway Homes Ltd		
project	Land at Townsend Farm, Melksham		
title	DORMOUSE TUBE LOCATION PLAN	scale	1:2,000 @ A3
number	FIGURE J1	rev	-

FPCR | environment
& design



Appendix K – Biodiversity Net Gain Report

Client

Bellway Homes Limited

Project

**Land at Townsend Farm,
Melksham**

Date

July 2026

CONTENTS

1.0	NON-TECHNICAL SUMMARY	1
2.0	INTRODUCTION	2
3.0	LEGISLATION AND POLICY	4
4.0	METHODOLOGY	7
5.0	RESULTS	9
6.0	PROPOSALS	12
7.0	CONCLUSION	13

FIGURES

Figure 3: Baseline Habitat Plan

Figure 4: Baseline Habitat Condition and Distinctiveness Plan

Figure K01: Proposed Habitat Plan

Figure K02: Habitat Retention Plan

Figure K03: Proposed Habitat Condition and Distinctiveness Plan

APPENDICES

Appendix A: Statutory Metric Headline Results

Appendix B: Baseline Habitat Condition Assessments

Appendix C: Indicative Proposed Habitat Condition Assessment Targets

Appendix D: Statutory Biodiversity Metric

Rev	Issue Status	Prepared/Date	Approved/Date
-	Final	JGW / 28.07.26	DJC / 29.07.26

1.0 NON-TECHNICAL SUMMARY

Report Scope and Methodology
FPCR were commissioned by Bellway Homes Limited to undertake a Biodiversity Net Gain (BNG) assessment at Land at Townsend Farm, Melksham to provide a baseline biodiversity score for the Site and compare this to proposals. Site proposals comprise a residential development. This assessment has been informed by a survey of the habitats present onsite, including condition assessments, undertaken on 27th May 2026.
Baseline
The primarily modified grassland in poor and moderate, and other neutral grassland in poor condition. There are two areas of developed land, and within these areas are ruderal, ephemeral and sparsely vegetated land. Other habitats include isolated patches of mixed and bramble scrub. Hedgerows form field boundaries and include 10 in total, the majority are native hedgerow or native hedgerow with trees in moderate or poor condition, with two in good condition in the south of the site and one species-rich hedgerow in good condition. There are two lines of trees in poor condition on boundaries, and a single individual tree.
Proposals
Outline application for up to 225 dwellings, with access from Semington Road, along with public open space and landscape buffers to incorporate existing rights of way and to accommodate the route of the proposed Melksham Link Canal (under separate application W/12/01080/FUL). Demolition and clearance of all existing buildings and structures on the site. All matters reserved other than vehicular access from Semington Road.
Conclusion
The scheme as proposed will result in a -4.07% loss in habitat units, and a -28.40% loss in hedgerow units. This assessment has therefore demonstrated that the proposals will require amending to deliver the requisite 10% gain on site, or an offsite solution sought.

2.0 INTRODUCTION

- 2.1 The following Biodiversity Net Gain (BNG) Report has been prepared by FPCR Environment and Design Ltd on behalf of Bellway Homes Limited to accompany an outline planning application for the redevelopment of Land at Townsend Farm, Melksham (Central OS Grid Ref: ST 89945 62637) herein referred to as 'the Site'.
- 2.2 This report accompanies an Ecological Impact Assessment (EclA) for the Site which has been undertaken to inform the development proposals and to provide recommendations for mitigation and enhancement. This report should therefore be read in conjunction with this accompanying EclA report (FPCR, 2026).

Site Context

- 2.3 The Site comprises approximately XX hectares of agricultural land located to the south of Melksham and north of Berryfield. Residential development is currently under construction immediately north of the Site, while planning permission has recently been granted for residential development on adjoining land to the south. Semington Road and associated settlement lie along the eastern boundary, while Berryfield Lane forms the western boundary, beyond which is agricultural land.
- 2.4 The Site is predominantly an active cattle farm comprising three large pastoral field parcels and an associated farmstead containing a number of agricultural buildings, several of which are no longer in active use. The southern and south-western parts of the Site are managed separately and include a horse paddock, derelict former poultry sheds, an active storage compound, and a small livestock enclosure with associated buildings. Boundaries are defined primarily by hedgerows, with mature trees along the northern boundary and residential properties adjoining the eastern and western boundaries. Remnant buildings associated with the Site's former use as a World War II airfield also remain within the Site.

Site Proposals

- 2.5 Outline application for up to 225 dwellings, with access from Semington Road, along with public open space and landscape buffers to incorporate existing rights of way and to accommodate the route of the proposed Melksham Link Canal (under separate application W/12/01080/FUL). Demolition and clearance of all existing buildings and structures on the site. All matters reserved other than vehicular access from Semington Road.

Report Scope and Objectives

- 2.6 This Biodiversity Net Gain Report is based on the CIEEM guidance¹. The scope and objectives of this report are to:
- Summarise the results of the baseline UKHab Survey undertaken on the Site and to present the results of habitat condition assessment surveys following the Defra Statutory Biodiversity Metric Technical Guidance.
 - Provide an overview of the proposed habitats following completion of the scheme.

¹ CIEEM (2021) *Biodiversity Net Gain Report and Audit Templates*. Chartered Institute of Ecology and Environmental Management, Winchester, UK.

- Present the results of the Statutory Biodiversity Metric assessment completed for the proposals.
- Demonstrate the capacity for the proposals to demonstrate a net gain in biodiversity through the Statutory biodiversity Metric.
- Provide recommendations for the proposals to maximise their biodiversity potential.

3.0 LEGISLATION AND POLICY

The Environment Act 2021

- 3.1 In England, biodiversity net gain is required under statutory frameworks introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). Under this framework, the majority of planning permission grants will be deemed to have been granted subject to a general biodiversity gain condition. This will require an objective for developments to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of all on-site habitats.
- 3.2 This is a pre-commencement condition requiring the provision of a Biodiversity Gain Plan to be submitted and approved before works can be commenced, but after planning permission has been granted.
- 3.3 In principle, the grant of planning permission is not within the scope of BNG, however it is important to consider as part of the consenting body's decision-making process how a scheme will be able to demonstrate BNG after permission is granted. Therefore, this biodiversity net gain report presents the results of a Biodiversity Net Gain assessment that has been completed in order to demonstrate how the proposals can be compliant with the requirements of the Environment Act.

Biodiversity Net Gain Hierarchy

- 3.4 The statutory framework allows for the 10% biodiversity gain to be delivered through on-site biodiversity gains, registered off-site biodiversity gains or statutory biodiversity credits. However, as set out in Articles 37A and 37D of the Town and Country Planning (Development Management Procedure) (England) Order 2015, development must consider the biodiversity net gain hierarchy when designing scheme proposals. This sets out hierarchy of actions as follows:
- a) First, for all medium, high and very high distinctiveness habitats, the avoidance of any adverse effects.
 - b) Where these can't be avoided, mitigating any adverse effects on medium, high and very high distinctiveness habitats.
 - c) Then, for all on-site habitats (including low distinctiveness), adverse effects should be compensated by in accordance with the following hierarchy:
 - Prioritising the enhancement of existing habitats; then
 - Creation of on-site habitats;
 - Allocation of registered off-site unit gains; then
 - Purchase of biodiversity credits
- 3.5 Proposals must demonstrate how the biodiversity hierarchy has been applied to or provide the reasons for any deviation. This biodiversity net gain hierarchy is distinct from the mitigation hierarchy set out by CIEEM which is addressed in the accompanying Ecological Impact Assessment (FPCR, 2026) where relevant.

National Planning Policy Framework

- 3.6 The National Planning Policy Framework (NPPF) 2024 seeks to ensure that the planning system contributes to and enhances the natural and local environment, protect and enhance biodiversity and geodiversity by:

“187. 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;

193. when determining planning applications, local planning authorities should apply the following principles: ...

193. d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.”

Mandatory Biodiversity Net Gain Minimum Reporting Requirements

- 3.7 The Government's BNG Planning Practice Guidance (PPG)² sets out the minimum requirements of any planning application subject to mandatory BNG to present as part of any submission in order to validate the application. For ease of reference, the minimum information required has been set out in Table 1 below.
- 3.8 Additional detail and information appropriate to the application is provided within this report in order to assist Wiltshire Council in their decision-making process and to provide confidence that the scheme will be able to demonstrate a mandatory BNG through the provision of a Biodiversity Gain Plan following receipt of planning permission, in accordance with the PPG.

² Defra (2025) Biodiversity Net Gain. Available at: <https://www.gov.uk/government/collections/biodiversity-net-gain>

Table 1: Checklist of Minimum BNG Reporting Requirements for Planning Application Validation

Minimum Requirements in BNG PPG	Statement of Relevance to Site
<i>Confirmation that the Site is believed to be subject to the mandatory BNG condition.</i>	The Site does not meet any of the exemption criteria and so it is understood that the site will be subject to the mandatory BNG condition.
<i>The pre-development biodiversity value of the Site, either on the data of application or an earlier proposed date (as appropriate).</i>	The accompanying Statutory Metric completed for the scheme provides the pre-development biodiversity value of the Site. The values are also presented within this report.
<i>Where an earlier date is proposed, provide the reasons for proposing that date.</i>	The 'relevant date' is proposed to be the latest date that a Site survey was completed during which observations were made to check if any significant changes in habitats had occurred. For the Site, this will be 27 th May 2026. This is considered to be an appropriate date as it is within the date that ecological data is considered valid (two years, as recommended by CIEEM).
<i>The completed metric calculation showing the calculations of the pre-development biodiversity value of the on-site habitat on the data of application (or proposed earlier date) including the publication date of the biodiversity metric used.</i>	The Statutory Biodiversity Metric, published in 02.06.26, was used to calculate the pre-development value of the Site. The completed metric has been provided alongside this BNG report.
<i>A statement whether activities have been carried out prior to the date of application (or proposed date), that result in loss of on-site biodiversity value (degradation).</i>	This statement confirms that FPCR and Bellway Homes Limited not aware of any habitat degradation on-site.
<i>A description of any irreplaceable habitat (as set out in column 1 of the Schedule to the Biodiversity gain Requirements (Irreplaceable Habitat) Regulations 2024) on the Site, that exists on the date of application (or an earlier proposed date)</i>	This statement confirms that no irreplaceable habitat has been identified on-site.
<i>Plan(s), drawn to an identified scale and showing the direction of North, showing on-site habitat existing on the date of application (or earlier proposed date) including any irreplaceable habitat (if applicable).</i>	Figure 3 shows the baseline habitats present on-site on the proposed relevant date (27 th May 2026). This includes the minimum requirement to show an identified scale and north arrow.

4.0 METHODOLOGY

Baseline Habitat Assessment

- 4.1 A habitat survey was conducted on 27th May 2026. Survey methods broadly followed the UK Habitat Classification System³ (UKHab) to map habitats present on Site. This involved a systematic walk over of the Site to classify the broad habitat types which were broadly mapped in the field using a detailed topography map produced for the scheme.
- 4.2 Habitat condition assessment surveys were completed on at the same time in accordance with the Statutory Biodiversity Metric Habitat Condition Assessment⁴ criteria. The summary results of the habitat condition assessment survey results are presented in this report, and details are provided in *Appendix B*.
- 4.3 Further details of the survey methodologies employed to assess the ecological baseline for the Site are provided in the accompanying Ecological Impact Assessment (FPCR, 2026).

Biodiversity Net Gain Calculation

- 4.4 Defra's Statutory Biodiversity Metric calculation tool was used to inform this BNG Report. It is an MS Excel spreadsheet that is used to quantify the predicted net-change in biodiversity value ("biodiversity units") of a proposed development site before and after development. It treats the area-based habitats and linear features such as hedgerows and lines of trees separately, and is based on pre-determined values, along with published written guidance set by a Natural England-led team of experts.
- 4.5 The development Site was surveyed and mapped, as described above. The survey results were digitised using QGIS, with the existing habitats identified and areas automatically generated.
- 4.6 On-Site post-development habitats were determined from the latest Development Framework Plan by Brandt Urban Design (P25-0016_CMP-02 Rev E) with proposed habitats mapped and digitised using QGIS to generate areas for each of the habitats proposed for enhancement.
- 4.7 These pre- and post-enhancement habitat areas were then inputted into the Statutory Biodiversity Metric Calculation tool. The metric automatically assigns habitat distinctiveness score for each of the baseline and proposed habitats.
- 4.8 The metric then assigns a range of pre-assigned factors to each of the proposed habitats. These have been advised by subject knowledge experts and are universal multipliers generated by the metric itself for the following variables relevant to habitat creation, enhancement or restoration proposals:
- difficulty of creating or restoring/enhancing a habitat: This pre-assigned score is based on how difficult a particular habitat type is to create or restore/enhance
 - temporal risk: this is the 'time to target condition' for any particular habitat and determines how long a particular habitat type is likely to take to reach the condition score that the desired condition score assigned to it.

³ Butcher, B., Edmonds, B., Norton, L., & Treweek, J. (n.d.). The UK Habitats Classification System V2. UKHab. Available at: <https://ukhab.org/>

⁴ Defra (2025) Guidance – Statutory biodiversity metric tools and guides: Statutory biodiversity metric condition assessments. Available at: <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides>

- spatial risk: this score is based on the distance between the site of habitat loss and any habitats creation or enhancement proposals at any off-site offsetting solutions.
- 4.9 The strategic significance multiplier within the metric has been informed by a desk study review. Full details of the desktop study undertaken are provide in the accompanying Ecological Impact Assessment.
- 4.10 Full details of the calculation methodology are provided in The Statutory Biodiversity Metric User Guide.

Limitations

- 4.11 There were no significant limitations.

5.0 RESULTS

Strategic Significance

- 5.1 Wiltshire and Swindon LNRS has been published. There are no mapped measures within the site boundary therefore all habitats have been assigned a low strategic significance.

Biodiversity Units

Habitats

- 5.2 A summary description and baseline conditions of the baseline habitats is provided in Table 2 below and an illustration is provided in *Figure 3*.
- 5.3 Full baseline condition assessment scores are provided in *Appendix B*.

Table 2: Baseline Habitats Summary

Ref	Habitat	Condition	Distinctiveness	Description
G1	Modified grassland	Moderate	Low	Agriculturally improved grassland field with >6 species/m ² . Public access was evident around the field perimeter. The habitat was dominated by grasses with limited herb diversity.
G2	Modified grassland	Poor	Low	Agriculturally improved species-poor grassland (<4 species/m ²) with a short, cattle-grazed sward. The grassland was dominated by grasses with limited herb diversity.
G3	Modified grassland	Poor	Low	Agriculturally improved species-poor grassland (<4 species/m ²), ungrazed at time of survey and uniformly long. The grassland was dominated by grasses with limited herb diversity.
G4	Other neutral grassland	Poor	Medium	Field with horse paddocks. The species assemblage was limited (6.4 species per m ²) reflected intensive horse grazing and poaching with 25%+ bare ground.
G5	Other neutral grassland	Poor	Medium	Neutral grassland (9 species/m ²) within a former pig enclosure, with ruderal species reflecting previous disturbance and ongoing succession.
G6	Other neutral grassland	Poor	Medium	Species-poor neutral grassland (3.8 species/m ²) verged between poultry sheds. Mixture of tall coarse grasses with ruderal species.
S1	Mixed scrub	Moderate	Medium	Small, scattered scrub comprising a mix of native and non-native shrubs.
S2	Mixed scrub	Poor	Medium	Dense tall scrub with four native species and bramble.
S3	Bramble scrub	Condition Assessment N/A	Medium	Small patch of tall bramble scrub on property boundary.

Ref	Habitat	Condition	Distinctiveness	Description
S4	Bramble scrub	Condition Assessment N/A	Medium	Small patch dense bramble scrub next to farm buildings
U1	Ruderal/Ep hemeral	Good	Low	Storage area with bare ground, parked trailer and recently deposited materials. Vegetation patchy and dominated by ruderal species and coarse grasses, with greater cover and structure developing towards the edges.
U2	Ruderal/Ep hemeral	Poor	Low	Ephemeral vegetation within heavily disturbed livestock enclosures, mostly formed by short, species-poor vegetation, abundant bare ground and evidence of nutrient enrichment.
U3	Ruderal/Ep hemeral	Poor	Low	Regularly mown ruderal vegetation at the site entrance and caravan area, dominated by low-growing herbs.
U4	Tall Forbs	Poor	Low	Patches of nettle-dominated vegetation occurring along habitat margins, typical of nutrient-enriched ground
U5	Tall forbs	Poor	Low	Tall ruderal vegetation on disturbed ground associated with the active storage area west of the former poultry farm. Diverse forb assemblage with scattered developing scrub.
Ti	Rural Tree	Good	Medium	Medium sized English Oak on field boundary.

Hedgerows

- 5.4 Hedgerows on site were predominantly associated with trees, with only one being considered species rich. Condition varied from poor to good. Table 3

Table 3: Baseline Hedgerow Summary

Ref	Hedgerow Type	Condition	Distinctiveness	Description
H1	Native hedgerow with trees	Good	Medium	Native hedgerow with trees. Tall structure with continuous structure and limited management. Average species 3.5.
H2	Native hedgerow with trees	Good	Medium	Native hedgerow with trees. Messy structure with limited management. Average of 4.0 species.
H3	Species-rich native hedgerow	Good	Medium	Species-rich native hedgerow. Messy structure with limited management. Shrub layer comprised hawthorn, elder, dog rose, English elm and blackthorn. Average 5.0 species.
H4	Native hedgerow	Poor	Low	Native hedgerow. Overtrimmed, thin and gappy, with dominance of bramble. Average 3.0 species.
H5	Native hedgerow with trees	Good	Medium	Native hedgerow with trees. Form was a row of trees with a continuous native shrub layer. Five well-spaced mature trees. Average 4.0 species.

Ref	Hedgerow Type	Condition	Distinctiveness	Description
H6	Native hedgerow with trees	Moderate	Medium	Native hedgerow. Mixed structure with semi-mature trees, limited management. Thin low and gappy and bramble dominant along much of its length. Average 2.0 species.
H7	Native hedgerow with trees	Moderate	Medium	Native hedgerow with trees. Continuous hedges showing signs of being overtimmed. Four trees. Average 3.0 species.
H8	Native hedgerow with trees	Moderate	Medium	Native hedgerow with trees. Thin and overtimmed hedge with two mature trees. Average 2.0 species.
H9	Native hedgerow	Moderate	Low	Native hedgerow. Relatively well-structured dense hedge. Shrub layer comprised blackthorn, hawthorn, elder, English elm, cypress sp. Average 3.5 species.
H10	Native hedgerow	Poor	Low	Native hedgerow. Thin and low section of hedge. Shrub layer comprised blackthorn, elder, hawthorn. Average 3.0 species.
LT1	Line of trees	Poor	Low	A small and sparse line of eared-willow Salix Arita mostly coppiced stools
LT2	Line of trees	Poor	Low	Line of mature trees that comprised eight well-spaced horse chestnut, four sycamore, and one field maple.

6.0 PROPOSALS

- 6.1 Proposed habitats are shown on *Figure K01*, while proposed habitat retention, enhancement and creation is shown on *Figure K02*. The proposals are summarised below, with broad creation, enhancement and management methods outlined in Table 4, as subject to detailed design.
- 6.2 At this outline design stage, planting plans and detailed habitat creation and ongoing management measures have not yet been fixed. Therefore, a number of assumptions regarding proposed habitat types and condition have been made during this assessment. Individual habitat type and condition targets are outlined within this section and have been informed by Development Framework Plan by Brandt Urban Design (P25-0016_CMP-02 Rev E) and ecological professional judgement.

Habitats

Habitat retention

- 6.3 One medium sized tree in good condition will be retained as part of the proposals.

Habitat Creation

- 6.4 Proposed habitat creation includes:
- Planting of areas of mixed scrub in east and south west of site.
 - Sowing of neutral grassland in centre and north of site.
 - Sowing of modified grassland close to the development areas.
 - Planting of 154 urban trees across the site.
 - Sustainable drainage system basins to be created in the centre of the site.

Table 4: Outline Habitat Creation, Enhancement and Management Proposals

Ref	Habitat	Description	Condition	Distinctiveness
	Urban tree	154 small urban trees will be planted across the scheme.	Poor	Medium
	Modified grassland	Modified grassland in small patches close to the development area has been scored as poor condition.	Poor	Low
	Modified grassland	Further from the development area modified grassland in moderate condition is proposed. This will have a higher average species count and be less subject to pressure from management and traffic.	Moderate	Low
	Other neutral grassland	Other neutral grassland will be created along the central east-west corridor and along the northern boundary, where recreational pressure will be low. This will be subject to a management regime allowing plants to set seeds prior to mowing.	Moderate	Medium
	Mixed scrub	Mixed scrub will be created in the east and south west of the site. These areas are too	Moderate	Medium

Ref	Habitat	Description	Condition	Distinctiveness
		small for clearings and rides but a transition into the grassland will be achievable.		
	Artificial unvegetated, unsealed surface	Play areas. Does not score in the metric.	N/A - Other	V.Low
	Developed land; sealed surface	Larger roads. Does not score in the metric.	N/A - Other	V.Low
	Sustainable drainage system	To be managed to moderate condition with a range of native plant species suited to a wet habitat.	Moderate	Low
	Vegetated garden	70:30 split for development parcels between 70% sealed surfaces such as driveways, buildings etc. and 30% vegetated gardens in line with metric guidance.	Condition Assessment N/A	Low
	Developed land; sealed surface	70:30 split for development parcels between 70% sealed surfaces such as driveways, buildings etc. and 30% vegetated gardens in line with metric guidance.	N/A - Other	V.Low

Hedgerows

Hedgerow Retention

6.5 Hedgerows to be retained include:

- H1, H2, H3, H5, H9, and LT1 will be entirely retained.
- H4, H6, and H8 will be partially retained.

Hedgerow Creation

6.6 Locations of proposed hedgerow creation is not defined within the present scheme.

7.0 CONCLUSION

7.1 The habitat retention, enhancement and creation proposals highlighted within this report have all been inputted into the Statutory Biodiversity Metric. Table 5 provides a summary of the headline results of the assessment completed for the proposals

Table 5: Statutory Biodiversity Metric Headline Results

Baseline	Habitat Units	28.93
	Hedgerow Units	12.00
	Watercourse Units	0.00
Post-Intervention	Habitat Units	27.75
	Hedgerow Units	8.59
	Watercourse Units	0.00
Total Net Unit Change	Habitat Units	-1.18
	Hedgerow Units	-3.41
	Watercourse Units	N/A
Total Net Percentage Change	Habitat Units	-4.07%

	Hedgerow Units	-28.40%
	Watercourse Units	N/A

- 7.2 The Statutory Metric has demonstrated that the scheme will result in a net loss for both habitats and hedgerows as it currently stands.

Feasibility of delivering a 10% net gain on site

- 7.3 Feasibility studies have determined that achieving a 10% biodiversity net gain for both habitats and hedgerows on site is feasible if the scheme is altered for management of a significant proportion of the site specifically for biodiversity, rather than the more balanced approach as detailed in this report. The details of this will be set out at reserve matters however there are no concerns that achieving a 10% net gain on this scheme is possible.
- 7.4 There is space within the scheme design to accommodate the required length of hedgerow to achieve a 10% net gain. Hedgerow locations should be targeted towards placement that will maximise ecological value such as improving the connectivity along the boundaries, linking the created habitats, and maintaining an east-west corridor through the centre of the site.

Habitat Trading Rules

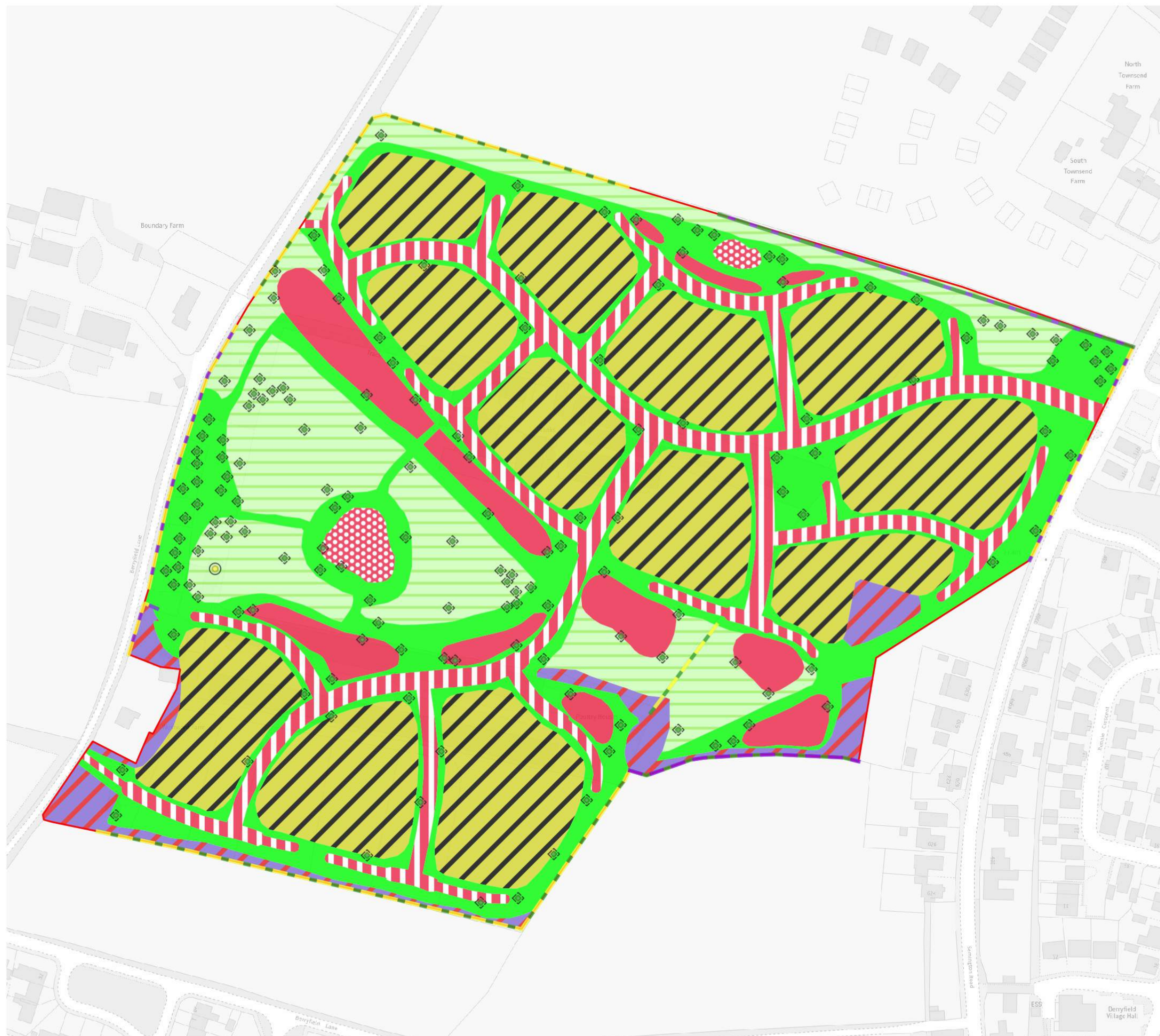
- 7.5 The scheme as it stands satisfies habitat trading rules for medium distinctiveness habitats and above for area habitats. At baseline the scrub, other neutral grassland, and retained individual tree are the only area habitats above low distinctiveness. The scheme at present has areas of scrub and medium distinctiveness grassland of suitable size to offset the losses, leaving only the additional units required to be provided from any area source.
- 7.6 There is a loss of medium and low distinctiveness hedgerow units. This will need to be compensated for by equivalent distinctness hedgerows.

Securing BNG

- 7.7 This BNG report outlines the approach and measures proposed to achieve a measurable net gain in biodiversity as part of the development. It demonstrates how the current design and habitat proposals are expected to achieve the required BNG target in accordance with the Environment Act 2021 and associated national and local planning policy. However, the assessment and calculations are based on the information available at this stage and may be subject to change as the project design, landscaping, and management details are refined through the planning process or as further ecological information becomes available. Any updates will be reflected in the Biodiversity Gain Plan to ensure continued compliance with statutory requirements.
- 7.8 Further details on habitat creation, enhancement and management can be provided at the detailed design stage of the proposals, where ecologists will input directly into landscape planting. A Habitat Management and Monitoring Plan will also be provided as part of a Biodiversity Gain Plan which, in accordance with the requirements of the Environment Act, will be provided following receipt of full planning permission. This HMMP will provide detail on how creation, retained and enhanced habitats across the Site that are significantly contributing to the Site's BNG will be managed for a minimum of 30 years.

FPCR Environment and Design Ltd

Registered Office: Lockington Hall, Lockington, Derby DE74 2RH
Company No. 07128076. [T] 01509 672772 [E] mail@fpcr.co.uk [W] www.fpcr.co.uk



- Redline Boundary
- Proposed Habitats
 - Artificial unvegetated, unsealed surface
 - Developed land; sealed surface
 - Mixed scrub
 - Modified grassland
 - Other neutral grassland
 - Sustainable drainage system
 - Residential
- Proposed Hedgerows
 - Line of trees
 - Native hedgerow
 - Native hedgerow with trees
 - Species-rich native hedgerow with trees
- Proposed Individual Trees
 - Proposed small urban tree
 - Retained medium rural tree

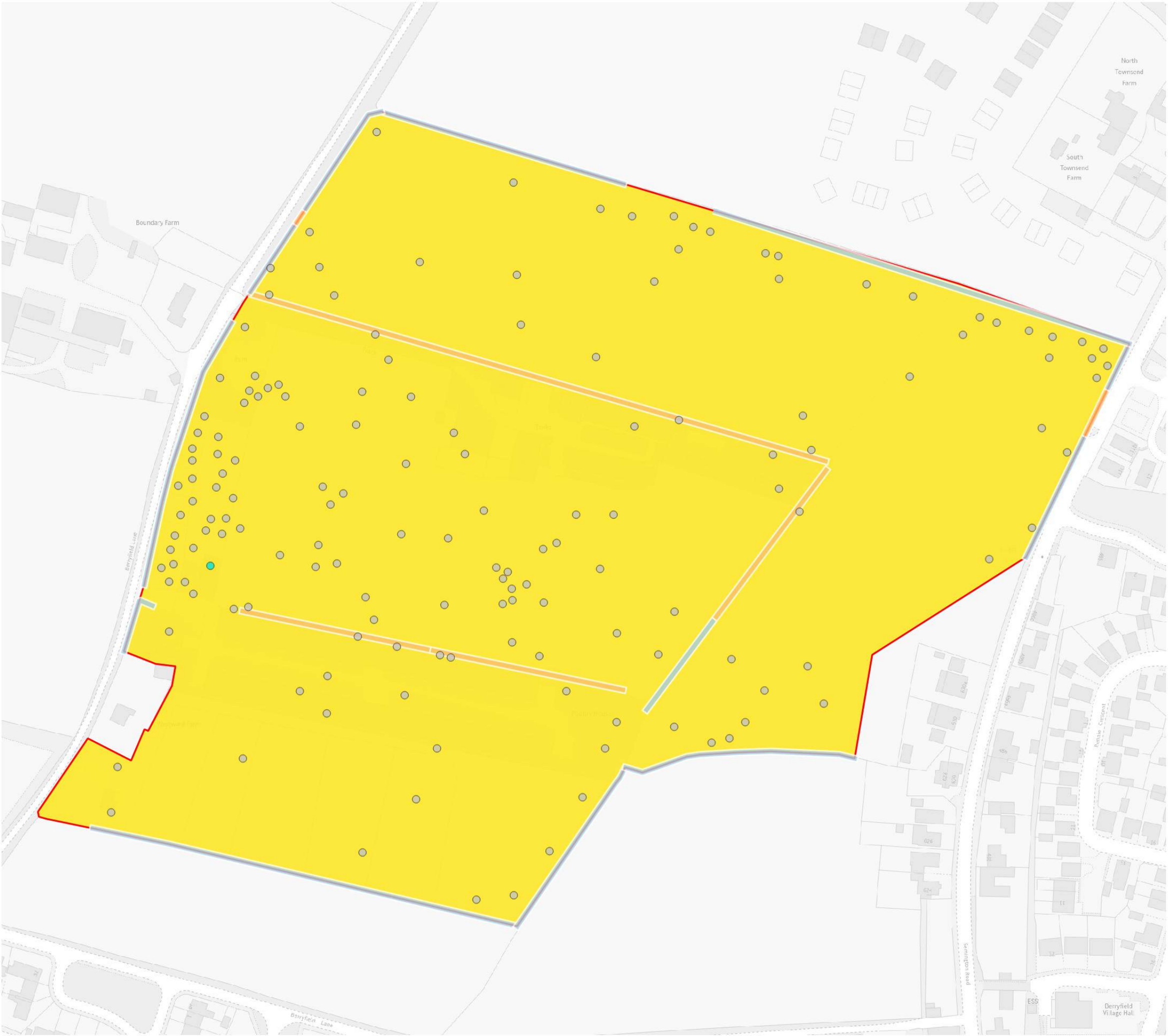
date 29/07/26 drwn/chkd DS / JS

client Bellway Homes Ltd
project Land at Townsend Farm, Melksham

title PROPOSED HABITAT PLAN scale 1:1,750 @ A3

number FIGURE K01 rev -

FPCR | environment & design



- Redline Boundary
- Habitats**
- Lost
- Hedgerows**
- Retained
- Lost
- Individual Trees**
- Created
- Retained

date		drwn/chkd
29/07/26		DS / JS
client		
Bellway Homes Ltd		
project		
Land at Townsend Farm, Melksham		
title		scale
HABITAT RETENTION PLAN		1:1,750 @ A3
number		rev
FIGURE K02		-



t: 01509 672772 e: mail@fpcr.co.uk w: www.fpcr.co.uk



APPENDIX A: STATUTORY BIODIVERSITY METRIC HEADLINE RESULTS

Headline Results		Return to results menu	
Scroll down for final results ⚠			
On-site baseline	Area habitat units	28.93	
	Hedgerow units	12.00	
	Watercourse units	0.00	
On-site post-intervention (Including habitat retention, creation & enhancement)	Area habitat units	27.75	
	Hedgerow units	8.59	
	Watercourse units	0.00	
On-site net change (units & percentage)	Area habitat units	-1.18	-4.07%
	Hedgerow units	-3.41	-28.40%
	Watercourse units	0.00	0.00%
Off-site baseline	Area habitat units	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Off-site post-intervention (Including habitat retention, creation & enhancement)	Area habitat units	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Off-site net change (units & percentage)	Area habitat units	0.00	0.00%
	Hedgerow units	0.00	0.00%
	Watercourse units	0.00	0.00%

APPENDIX B: BASELINE HABITAT CONDITION ASSESSMENTS

Grassland (Low Distinctiveness)							
Criteria		Grassland Ref.					
		G1	G2	G3	G4	G5	G6
A	There are 6-8 vascular plant species per m ² present, including at least 2 forbs (these may include those listed in Footnote 1). This criterion is essential for achieving Moderate or Good condition.	Pass	Fail	Fail			
B	Sward height is varied (at least 20% is less than 7cm and at least 20% is more than 7cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed.	Fail	Fail	Fail			
C	Any scrub present accounts for less than 20% of the total grassland area (some scattered scrub such as bramble <i>Rubus fruticosus</i> agg. may be present).	Pass	Pass	Pass			
D	Physical damage is evident in less than 5% of total grassland area. Examples of physical damage include excessive poaching, damage from machinery use or storage, erosion cause by high levels of access, or any other damaging management activities.	Fail	Pass	Pass			
E	Cover of bare ground is between 1-10% including localised areas. For example, a concentration of rabbit warrens, or small scattered areas of bare ground allowing establishment of new species.	Pass	Fail	Fail			
F	Cover of bracken <i>Pteridium aquilinum</i> is less than 20%.	Pass	Pass	Pass			
G	There is an absence of invasive non-native species as listed on Schedule 9 of Wildlife and Countryside Act 1981 (as amended).	Pass	Pass	Pass			
Essential criterion achieved?		Yes	No	No			
Number of criteria passed		5	4	4			
Condition Good – Passes 6 or 7 criteria including criterion A Moderate (Mod)– Passes 4 or 5 criteria including criterion A Poor – Passes 3 or fewer criteria OR passes 4-6 criteria excluding criterion A		Mod					
Footnote 1 – Creeping thistle <i>Cirsium arvense</i> , spear thistle <i>Cirsium vulgare</i> , curled dock <i>Rumex crispus</i> , broad-leaved dock <i>Rumex obtusifolius</i> , common nettle <i>Urtica dioica</i> , creeping buttercup <i>Ranunculus repens</i> , greater plantain <i>Plantago major</i> , white clover <i>Trifolium repens</i> and cow parsley <i>Anthriscus sylvestris</i>							

Grassland (Medium, High and Very High Distinctiveness)							
Lowland calcareous grassland, Lowland dry acid grassland, Lowland meadows, Other lowland acid grassland, Other neutral grassland, Tall herb communities (H6430), Upland acid grassland, Upland calcareous grassland, Upland hay meadow, Calaminarian grassland							
Criteria		Grassland Ref.					
		G4	G5	G6	G4	G5	G6
A	The parcel represents a good example of its habitat type, with a consistently high proportion of characteristic indicator species relevant to the specific habitat type and relative to Footnote 1 suboptimal species which may be listed in the UKHab description (professional judgement should be used). This criterion is essential for achieving Moderate or Good condition for non-acid grassland types only.	Fail	Fail	Fail			
B	Sward height is varied (at least 20% is less than 7cm and at least 20% is more than 7cm) creating microclimates which provide opportunities for insects, birds and small mammals to live and breed.	Pass	Pass	Fail			
C	Cover of bare ground is between 1-5% including localised areas. For example, a concentration of rabbit warrens, or small scattered areas of bare ground allowing establishment of new species.	Fail	Pass	Pass			
D	Cover of bracken <i>Pteridium aquilinum</i> is less than 20% and cover of scrub (including bramble <i>Rubus fruticosus</i> agg.) is less than 5%.	Pass	Pass	Pass			
E	Combined cover of species indicative of suboptimal condition (Footnote 1) and physical damage (e.g. excess poaching, damage from machinery or storage, damaging levels of access, or any other damaging management activities) accounts for less than 5% of total area. If any invasive non-native plant species (as listed on Schedule 9 of WCA) are present, this criterion is automatically failed.	Fail	Pass	Fail			
Additional criterion for all non-acid grassland types							
F	There are 10 or more vascular plant species per m ² present, including forbs that are characteristic of the habitat type (species listed in Footnote 1 and WCA Schedule 9 non-native species cannot contribute towards this count). This criterion is essential for achieving Good condition for non-acid grassland types only.	Fail	Fail	Fail			
Essential criterion achieved?		No	No	No			
Number of criteria passed		2	4	2			
Condition Good – Passes 5-6 criteria including criterion A and F Moderate (Mod)– Passes 3-5 criteria including criterion A Poor – Passes 2 or fewer criteria OR passes 3-4 criteria excluding criterion A and F		Poor	Poor	Poor			
Footnote 1 – Species indicative of suboptimal condition for this habitat type include: creeping thistle <i>Cirsium arvense</i> , spear thistle <i>Cirsium vulgare</i> , curled dock <i>Rumex crispus</i> , broad-leaved dock <i>Rumex obtusifolius</i> , common nettle <i>Urtica dioica</i> , creeping buttercup <i>Ranunculus repens</i> , greater plantain <i>Plantago major</i> , white clover <i>Trifolium repens</i> and cow parsley <i>Anthriscus sylvestris</i> . There may be additional relevant species local to the region or site.							

Scrub							
Blackthorn scrub, Gorse scrub, Hawthorn scrub, Hazel scrub, Mixed scrub, Dunes with sea buckthorn (H2160), Willow scrub							
Criteria		Scrub Ref.					
		S1	S2	S3	S4	S5	S6
A	The parcel represents a good example of its habitat type – the appearance and composition of the vegetation closely matches its UKHab description (where in its natural range). At least 80% of scrub is native. There are at least three native woody species as defined and listed in the Hedgerow Survey Handbook (Defra 2007). No single species comprises more than 75% of the cover, except hazel <i>Coryllus avellana</i> , common juniper <i>Juniperus communis</i> , sea buckthorn <i>Hippophae rhamnoides</i> (only in its restricted native range), or box <i>Buxus sempervirens</i> , which can be up to 100% cover.	Pass	Pass				
B	Seedlings, saplings, young shrubs and mature (or ancient or veteran) shrubs are all present.	Pass	Fail				
C	There is an absence of invasive non-native species (as listed under Schedule 9 of WCA) and species indicative of suboptimal condition (Footnote 1) make up less than 5% of ground cover.	Fail	Pass				
D	The scrub has a well-developed edge with scattered scrub and tall grassland and/or forbs present between the scrub and adjacent habitat.	Pass	Fail				
E	There are clearings, glades or rides present within the scrub, providing sheltered edges.	Fail	Fail				
Number of criteria passed		3	2				
Condition Good – Passes 5 criteria Moderate (Mod)– Passes 3-4 criteria Poor – Passes 2 or fewer criteria		Mod	Poor				
Footnote 1 – Species indicative of suboptimal condition for this habitat type may include: non-native conifers, tree-of-heaven <i>Alianthus altissima</i> , holm oak <i>Quercus ilex</i> , European turkey oak <i>Quercus cerris</i> , cherry laurel <i>Prunus laurocerasus</i> , snowberry <i>Symphoricarpos</i> spp., shallon <i>Gaultheria shallon</i> , American skunk cabbage <i>Lysichiton americanus</i> , buddleia <i>Buddleja</i> spp., cotoneaster <i>Cotoneaster</i> spp., Spanish bluebell <i>Hyacinthoides hispanica</i> , and hybrid bluebell <i>Hyacinthoides</i> x <i>massartiana</i> . There may be additional relevant species local to the region and/or site.							

Hedgerows							
Native hedgerow, Native hedgerow associated with bank or ditch, Native hedgerow with trees, Native hedgerow with trees associated with bank or ditch, Species-rich native hedgerow, Species-rich native hedgerow associated with bank or ditch, Species-rich hedgerow with trees, Species-rich native hedgerow with trees associated with bank or ditch							
Criteria		Hedgerow Ref.					
		H1	H2	H3	H4	H5	H6
A1	>1.5m average height along length, estimated from base of stem to the top of the shoots, excluding any bank beneath the hedgerows, any gaps or isolated trees. Newly laid or coppiced hedgerows are indicative of good management and pass this criterion for up to a maximum of 4 years. A newly planted hedgerow does not pass unless it is >1.5m in height.	Pass	Pass	Pass	Fail	Pass	Fail
A2	>1.5 average width along length, estimated at the widest point of the canopy, excluding gaps and isolated trees. Outgrowths e.g. blackthorn <i>Prunus spinosa</i> suckers are only included in the width estimate when they are >0.5m in height. Laid, coppiced, cut and newly planted hedgerows are indicative of good management and pass for up to a max. of 4 years.	Pass	Pass	Pass	Fail	Pass	Fail
B1	Gap between ground and base of canopy <0.5m for >90% of length. Certain exceptions are acceptable – Page 65 of the Hedgerow Survey Handbook (Defra 2007).	Pass	Pass	Pass	Fail	Pass	Pass
B2	Gaps make up <10% of total length and no canopy gaps >5m. Access points and gates contribute to the overall gappiness but are not subject to the >5m criterion.	Pass	Pass	Pass	Fail	Fail	Fail
C1	>1m width of undisturbed ground with perennial herbaceous vegetation for >90% of length measured from outer edge of hedgerow and is present on at least one side of the hedgerow.	Pass	Pass	Pass	Pass	Pass	Pass
C2	Plant species indicative of nutrient enrichment of soils dominate <20% cover of the area of undisturbed ground. Indicator species used are nettles <i>Urtica</i> spp., cleavers <i>Galium aparine</i> and docks <i>Rumex</i> spp.	Fail	Fail	Fail	Pass	Pass	Fail
D1	>90% of the hedgerow and undisturbed ground is free of invasive non-native plant species, including those listed on Schedule 9 of the WCA, and recently introduced species (naturalised in the UK since AD1500 – BSBI online atlas).	Pass	Pass	Pass	Pass	Pass	Pass
D2	>90% of the hedgerow or undisturbed ground is free of damage caused by human activities, such as pollution, piles of manure or rubble, or inappropriate management practices e.g. excessive hedgerow cutting.	Pass	Pass	Pass	Fail	Pass	Pass
Additional criteria for hedgerows with trees only							
E1	There is more than one age-class of tree present and there is on average at least one mature, ancient or veteran tree present per 20-50m of hedgerow.	Pass	Pass	Pass		Pass	Pass
E2	At least 95% of hedgerow trees in a healthy condition excluding veteran features valuable for wildlife. There is little or no evidence of an adverse impact on tree health by damage from livestock, wild animals, pests, disease, or human activity.	Pass	Pass	Pass		Pass	Pass
Number of criteria failed		1	1	1	5	1	4
Condition		Good	Good	Good	Poor	Good	Mod
Without trees: Good – No more than two failures in total AND no more than 1 failure in any functional group. Moderate – No more than 4 failures in total (5 with trees) AND does not fail both attributes in more than one functional group. Poor – Fails a total of more than 4 attributes (5 with trees) OR fails both attributes in more than one functional group.							

Hedgerows								
Native hedgerow, Native hedgerow associated with bank or ditch, Native hedgerow with trees, Native hedgerow with trees associated with bank or ditch, Species-rich native hedgerow, Species-rich native hedgerow associated with bank or ditch, Species-rich hedgerow with trees, Species-rich native hedgerow with trees associated with bank or ditch								
Criteria			Hedgerow Ref.					
			H7	H8	H9	H10		
A1	>1.5m average height along length, estimated from base of stem to the top of the shoots, excluding any bank beneath the hedgerows, any gaps or isolated trees. Newly laid or coppiced hedgerows are indicative of good management and pass this criterion for up to a maximum of 4 years. A newly planted hedgerow does not pass unless it is >1.5m in height.		Pass	Pass	Pass	Pass		
A2	>1.5 average width along length, estimated at the widest point of the canopy, excluding gaps and isolated trees. Outgrowths e.g. blackthorn <i>Prunus spinosa</i> suckers are only included in the width estimate when they are >0.5m in height. Laid, coppiced, cut and newly planted hedgerows are indicative of good management and pass for up to a max. of 4 years.		Fail	Fail	Pass	Fail		
B1	Gap between ground and base of canopy <0.5m for >90% of length. Certain exceptions are acceptable – Page 65 of the Hedgerow Survey Handbook (Defra 2007).		Fail	Pass	Pass	Pass		
B2	Gaps make up <10% of total length and no canopy gaps >5m. Access points and gates contribute to the overall gappiness but are not subject to the >5m criterion.		Fail	Fail	Fail	Fail		
C1	>1m width of undisturbed ground with perennial herbaceous vegetation for >90% of length measured from outer edge of hedgerow and is present on at least one side of the hedgerow.		Pass	Pass	Fail	Fail		
C2	Plant species indicative of nutrient enrichment of soils dominate <20% cover of the area of undisturbed ground. Indicator species used are nettles <i>Urtica</i> spp., cleavers <i>Galium aparine</i> and docks <i>Rumex</i> spp.		Fail	Fail	Fail	Fail		
D1	>90% of the hedgerow and undisturbed ground is free of invasive non-native plant species, including those listed on Schedule 9 of the WCA, and recently introduced species (naturalised in the UK since AD1500 – BSBI online atlas).		Pass	Pass	Pass	Pass		
D2	>90% of the hedgerow or undisturbed ground is free of damage caused by human activities, such as pollution, piles of manure or rubble, or inappropriate management practices e.g. excessive hedgerow cutting.		Pass	Fail	Pass	Fail		
E1	There is more than one age-class of tree present and there is on average at least one mature, ancient or veteran tree present per 20-50m of hedgerow.		Pass	Pass				
E2	At least 95% of hedgerow trees in a healthy condition excluding veteran features valuable for wildlife. There is little or no evidence of an adverse impact on tree health by damage from livestock, wild animals, pests, disease, or human activity.		Pass	Pass				
Number of criteria failed			4	4	3	5		
Condition			Mod	Mod	Mod	Poor		
Without trees: Good – No more than two failures in total AND no more than 1 failure in any functional group. Moderate – No more than 4 failures in total (5 with trees) AND does not fail both attributes in more than one functional group. Poor – Fails a total of more than 4 attributes (5 with trees) OR fails both attributes in more than one functional group.								

Line of Trees (Rural locations only) Line of trees, Line of trees associated with bank or ditch, Ecologically valuable line of trees, Ecologically valuable line of trees associated with a bank or ditch							
Criteria		Line of Trees Ref.					
		LT1	LT2	LT3	LT4	LT5	LT6
A	At least 70% of trees are native species.	Fail	Pass				
B	Tree canopy is predominantly continuous with gaps in canopy cover making up <10% of total area and no individual gap being >5m wide.	Fail	Fail				
C	One or more trees has veteran features and or natural ecological niches for vertebrates and invertebrates, such as presence of standing and attached deadwood, cavities, ivy or loose bark.	Pass	Fail				
D	There is an undisturbed naturally vegetated strip of at least 6m on both sides to protect the line of trees from farming and other human activities, excluding grazing.	Fail	Fail				
E	At least 95% of the trees are in a healthy condition (deadwood or veteran features valuable for wildlife are excluded from this). There is little or no evidence of an adverse impact on tree health by damage from livestock, wild animals, pests, diseases, or human activity.	Pass	Fail				
Number of criteria passed		2	1				
Condition Good – Passes 5 criteria Moderate (Mod)– Passes 3-4 criteria Poor – Passes 2 or fewer criteria		Poor	Poor				

Individual Trees							
Individual urban trees, Individual rural trees							
Trees over 7.5cm in diameter at breast height (DBH) whose canopies are not touching.							
In urban settings, this includes groups or stands of trees within and around the perimeter of urban land (that don't match woodland descriptions), including along urban streets, highways, railways, canals, and former field boundary trees incorporated into developments. Canopies should predominantly overlap continuously.							
Criteria		Tree Ref.					
		T1	T2	T3	T4	T5	T6
A	The tree is a native species (or at least 70% within the block in urban settings).	Pass					
B	Individual trees automatically pass this criterion. Trees in groups/stands - the tree canopy is predominantly continuous, with gaps in canopy cover making up <10% of total area and no individual gap being >5m wide.	Pass					
C	The tree is mature (or more than 50% within the block are mature).	Pass					
D	There is little or no evidence of an adverse impact on tree health by human activities, such as vandalism, herbicide or detrimental agricultural activity, AND there is no current regular pruning regime, so the trees retain >75% of expected canopy for their age range and height.	Pass					
E	Natural ecological niches for vertebrates and invertebrates are present, such as deadwood, cavities, ivy or loose bark.	Pass					
F	More than 20% of the tree canopy is oversailing vegetation beneath.	Pass					
Number of criteria passed		6					
Condition Good – Passes 5-6 criteria Moderate (Mod)– Passes 3-4 criteria Poor – Passes 2 or fewer criteria		Good					

Urban							
Ruderal/ephemeral (sparsely vegetated land), Tall forbs (sparsely vegetated land), Allotments, Biodiverse green roof, Bioswale, Cemeteries and churchyards, Façade-bound green wall, Ground based green wall, Intensive green roof, Open mosaic habitats on previously developed land, Rain garden, SuDS, Vacant or derelict land, Bare ground							
Criteria		Urban Ref.					
		U1	U2	U3	U4	U5	U6
A	Vegetation structure is varied, providing opportunities for vertebrates and invertebrates to live, eat and breed. A single structural habitat component or vegetation type does not account for more than 80% of the total habitat area.	Pass	Fail	Fail	Fail	Fail	
B	The habitat parcel contains different plant species that are beneficial for wildlife, e.g. flowering species providing nectar sources for a range of invertebrates at different times of year.	Pass	Fail	Fail	Fail	Pass	
C	Invasive non-native plant species (Schedule 9 of WCA) and other which are to the detriment of native wildlife (using professional judgement) cover <5% of total vegetated area. This criterion must be satisfied by a complete absence of invasive non-native species to achieve Good condition.	Pass	Pass	Pass	Pass	Pass	
Additional criterion for open mosaic habitat on previously developed land only:							
D	There is spatial variation and forms a mosaic of bare substrate PLUS at least 4 early successional communities: annuals; mosses/liverworts; lichens; ruderals; inundation species; open grassland; flower-rich grassland; heathland; pools.	N/A	N/A	N/A	N/A	N/A	
Additional criteria for bioswales and SuDS only:							
E1	Plant species are mostly native. If non-native species are present, they should not be detrimental to the habitat or native wildlife (professional judgement).	N/A	N/A	N/A	N/A	N/A	
E2	The vegetation is comprised of plant species suited for wetland or riparian situations.	N/A	N/A				
Additional criterion for intensive green roofs only							
F	The roof has a minimum of 50% native and non-native wildflowers. 70% of the roof area is soil and vegetation, including water features.	N/A	N/A	N/A	N/A	N/A	
Additional criterion for biodiverse green roofs only:							
G	The roof has a varied depth of 80-150mm; at least 50% is at 150mm and is planted and seeded/pre-prepared with wildflowers and sedums. To achieve Good condition, some additional habitats should be present, such as sand piles, stones, logs, etc.	N/A	N/A	N/A	N/A	N/A	
Number of criteria passed		3	1	1	1	1	
Condition Good – Passes all 3 criteria AND meets requirements for criterion C Good condition (AND passes additional criterion relevant to habitat type). Moderate (Mod)– Passes 2 criteria (AND criterion for habitat type) OR passes 3 but does not meet requirements for criterion C Good condition. Poor – Passes 0-1 criteria (or 2 or fewer for Bioswales and SuDs).		Good	Poor	Poor	Poor	Poor	

