



Preliminary Ecological Appraisal and Roost Assessment

Church Farm, Lower Seagry, SN15 5EP

For Heather Waddington

August 2026

DOCUMENT CONTROL SHEET

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1.0 Introduction

- 1.1 Herdwick Ecology was commissioned by Heather Waddington to undertake Preliminary Ecological Appraisal and an update Preliminary Roost Assessment at Church Farm, Lower Seagry, SN15 5EP (Grid Reference: ST95878084). The proposals include the conversion of a Class Q into Full Planning Permission for one new self-build dwelling. It includes the creation of four-bedrooms with open-plan living space and a garage/workshop. Class Q planning consent was granted by Wiltshire Council in 2023 for which a Preliminary Roost Assessment was conducted (Herdwick Ecology, 2023). This report concluded that the buildings had negligible potential for bats. Given the time that has lapsed, an update inspection was required to inform the new application.
- 1.2 This report has been prepared to support a full planning application to Wiltshire Council and aims to:
- Describe and evaluate the habitats present within the study area;
 - Collate relevant biological records and assess their significance;
 - Identify any protected species issues or potential issues that may exist; and
 - Assess possible ecological constraints to development and make recommendations to avoid, minimise and mitigate for any potential impacts during the development of a detailed application; and
 - Set out opportunities for net gain and ecological enhancements in line with relevant planning policy, legislation and other published guidance to inform a detailed application.
- 1.3 This report has been prepared by Ceri Griffiths, Director at Herdwick Ecology, who is a Full Member of the Chartered Institute of Ecology and Environmental Management (CIEEM). Reference is made to CIEEM Guidelines for Preliminary Ecological Appraisal¹ and Bat Survey Good Practice Guidelines² and BS 42020:2013 Biodiversity - Code of practice for planning and development³.

2.0 Legislation and Planning Policies

- 2.1 In carrying out this assessment relevant legislation, planning policies, and best practice guidelines were consulted and include:
- Conservation of Habitats and Species Regulations 2017 (as amended);
 - Wildlife and Countryside Act 1981 (as amended);
 - Countryside and Rights of Way (CROW) Act 2000;
 - Natural Environment and Rural Communities (NERC) Act 2006;
 - National Planning Policy Framework 2026 (NPPF);
 - Local Planning Policies and supplementary planning documents/technical guidance.

¹ CIEEM (2017) *Guidelines for Preliminary Ecological Appraisal* (2nd. Ed.) CIEEM

² Collins, J (ed.) (2023) *Bat Surveys for Professional Ecologists: Good Practice Guidelines* (4th. Ed.) The Bat Conservation Trust, London

³ BSI (British Standards Institute) BS4202:2013 *Biodiversity – A code of practice for planning and development*. BSI, London.

National Planning Policy Framework (NPPF) 2026

- 2.2 National planning policy on biodiversity and conservation is set out in the National Planning Policy Framework (NPPF). The 2026 revision of the National Planning Policy Framework (NPPF) introduces strengthened national policy provisions relating to the conservation and enhancement of biodiversity. The updated framework aligns more explicitly with the statutory requirements established under the Environment Act 2021, including the mandatory Biodiversity Net Gain (BNG) regime, and reinforces the expectation that development proposals must contribute positively to ecological recovery.
- 2.3 Chapter 19: Conserving and Enhancing the Natural Environment, is of particular relevance to this report as it relates to ecology and biodiversity. Relevant policies are set out below:
- 2.4 National decision-making policy N2: *'Improving the natural environment'*. This policy states that development should:
- '1: contribute positively to the natural environment, and support nature's recovery, development proposals should'*, in summary:
- a. Consider the environmental qualities of land proposed for development and identify opportunities for those qualities to be conserved or enhanced (including through requirements for biodiversity net gain where these apply);
 - b. Take into account the quality of agricultural land;
 - c. Take suitable opportunities to connect to and strengthen ecological networks that extend beyond the site, drawing on the measures proposed by Local Nature Recovery Strategies, National Forest Strategies and Community Forest Plans, where present, and other relevant assessments;
 - d. Conserve and enhance existing natural features of visual, historic or nature conservation value (such as established trees and hedgerows) where possible; and use appropriate landscaping to help create a well-designed place and integrate the development into its surroundings;
 - e. Use green infrastructure provided as part of the scheme and nature-based solutions to secure multiple benefits;
 - f. Minimise any adverse impacts on biodiversity and include features which support priority or threatened species such as swifts, bats and hedgehogs. Development proposals should incorporate integrated nest boxes (commonly known as swift bricks) into their construction unless there are compelling technical reasons which prevent their use, or would make them ineffective; and
 - g. Ensure that green infrastructure and other features to support nature are located and designed to minimise risk of future failure, and that appropriate measures are in place for any necessary long-term management.

2. 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 the development should be refused.

3. Relates to development proposals that exceed the statutory objective for BNG.

N3: *'Trees in new development'*. This policy relates to the benefits which trees can provide for biodiversity, climate change mitigation and adaptation, and the character and quality of the built environment, development proposals.

N6: *'Areas of particular importance for biodiversity and geodiversity'*. This policy sets out the conservation of important habitats and species with regard to sites of international importance i.e. Special Areas of Conservation (SAC) and Special Protection Areas (SPA) and Ramsar sites, and National importance i.e. Sites of Special Scientific Interest (SSSI), and local importance i.e. local or County wildlife sites.

British Standard BS 42020:2013 – Biodiversity: Code of Practice for Planning and Development

2.5 BS 42020:2013 provides a nationally recognised code of practice for biodiversity in the planning and development process. It sets out principles for ensuring that ecological information is proportionate, robust, and fit for purpose, and that biodiversity considerations are integrated effectively into land-use planning and development management.

2.6 It states the following step-wise process:

- Avoidance – avoiding adverse effects through good design;
- Mitigation – where it is unavoidable, mitigation measures should be employed to minimise adverse effects;
- Compensation – where residual effects remain after mitigation it may be necessary to provide compensation to offset any harm; and
- Enhancement – planning decisions often present the opportunity to deliver benefits for biodiversity, which can also be explored alongside the above measures to resolve potential adverse effects.

2.7 The measures for avoidance, mitigation, compensation, and enhancement should be *'proportionate to the predicted degree of risk to biodiversity and to the nature and scale of the proposed development'*

Conservation of Habitats and Species Regulations 2017 (as amended)

2.8 In summary these regulations, also referred to as the Habitat Regulations, cover the designation and protection of European sites and the protection of European protected species (EPS).

Environment Bill and Biodiversity Net Gain

- 2.5 The Environment Bill received Royal Assent on 9th November 2021, becoming the Environment Act; this includes the provision of biodiversity gain for developments in England, which will be mandated through an amendment to the Town and Country Planning Act 1990. The two-year transition period that follows Royal Assent means that mandatory Biodiversity Net Gain (BNG) became law on 12th February 2024, with small sites being mandatory on the 2nd April 2024 under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).
- 2.6 The BNG Regulations also include 'The Biodiversity Gain Requirements (Exemptions) Regulations 2024' which prescribe exemptions for categories of development to which biodiversity net gain does not apply. The exemption policy was subsequent updated on the 6th August 2026, which includes the following:

'Developments of 0.2 hectares or below:

From 6 August 2026, BNG does not apply to planning applications for developments where the site area within the red line boundary is 0.2 hectares or below.'

- 2.7 This exemption is not applicable where a Priority Habitat is present within the application boundary.

Local Plan

- 2.8 The Wiltshire Core Strategy Development Plan Document ('the plan') was formally adopted on 20 January 2015. The plan provides a positive and flexible overarching planning policy framework for Wiltshire for the period up to 2026. Policy 50 'Biodiversity and Geodiversity' states that: *'Development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term.... All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development.* The policy goes on to state that all developments should seek opportunities to enhance biodiversity.

Species Protection

- 2.9 A number of species, including all bats and great crested newts, are afforded protection under The Wildlife and Countryside Act 1981 (as amended).
- 2.10 Under this legislation, a person is guilty of an offence if a person intentionally or recklessly:
- disturbs any animal while it is occupying a structure or place which it uses for shelter or protection;
 - obstructs access to any structure or place which any animal uses for shelter or protection.

- 2.11 In addition the protection afforded through UK legislation, further protection is provided to a small group of species, commonly referred to as 'European Protected Species' under the Conservation of Habitats and Species 2017 (as amended) (also known as the Habitats Regulations), including bats and great crested newts.
- 2.12 With regards to European Protected Species listed under Schedule 2 of the Act, it is an offence to:
- Intentionally or deliberately capture or kill, or intentionally injure the animal;
 - Deliberately disturb the animal or intentionally or recklessly disturb them in a place used for shelter or protection;
 - Damage or destroy a breeding site or resting place;
 - Intentionally or recklessly damage, destroy or obstruct access to a place used for shelter or protection.
- 2.13 The Habitats Directive provides for the derogation from these above prohibitions for specified reasons and providing certain conditions are met. Those derogations are transposed into the Regulations by way of a licensing regime that allows what would otherwise be an unlawful act to be carried out lawfully. Among the reasons why a licence may be granted and the reason relied upon by developers when seeking a licence to carry out operations for the purposes of development, is that there are imperative reasons of overriding public interest why the operation should be carried out.
- 2.14 Whilst Natural England is the licensing body, the LPA must have due regard for the Habitat Regulations during the planning process and that the following three derogation tests will be met:
- Test 1: *Regulation 53(2)(e) states: 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: *Regulation 53(9)(a) states: the appropriate authority shall not grant a licence unless they are satisfied "that there is no satisfactory alternative".*
 - Test 3: *Regulation 53(9)(b) states: 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*
- 2.15 The NERC Act also listed species of principle importance under Section 41 of the Act. This places further duties on the LPA to have due regard for the conservation of these species, such as hedgehog or certain bird species, which may be present on-site.

3.0 Methodology

Data Search

- 3.1 Online sources were reviewed, such as MAGIC⁴, to search for designated sites, priority habitats and records of local European Protected Species (EPS) licence. In addition, the Wiltshire Council planning portal was searched for nearby applications. Given the small scale and nature of the development, a data request from the records centre was not considered necessary to support this application.

Preliminary Ecological Appraisal

- 3.2 A Preliminary Roost Assessment was initially undertaken on 16th February 2023 and updated on the 16th January 2026. The surveys were conducted by Ceri Griffiths, Director of Herdwick Ecology, with full membership of Chartered Institute of Ecology and Environmental Management (CIEEM) and a Natural England bat licence holder. The survey included an inspection of agricultural barn and adjacent open sided sheds, as illustrated in Figure 1 below. Each building was systematically inspected, and the exterior assessed, with the aid of binoculars (Pentax 10 X 36), endoscope and high powered torch, where necessary. A description of the building was made, and the location of any potential access points or roost locations were noted.
- 3.3 The internal assessment involved a search to look for bats, or evidence of bats such as droppings or staining around common roost locations. A high-powered torch and endoscope were used where necessary to inspect the building more closely.
- 3.4 The surrounding habitat was also surveyed and assessed for its potential to support potential for notable species.
- 3.5 Following the inspection, an assessment was made of the building's suitability to support a bat roost, following the criteria set out in Table 1 below.

Table 1 Suitability Assessment⁵

Suitability	Roosting Habitat
Negligible	Negligible habitat features on site likely to be used by roosting bats.
Low	A structure with one or more potential roost sites 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 larger numbers of bats

⁴ <https://magic.defra.gov.uk/>

⁵ Collins, J (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th. Ed.) The Bat Conservation Trust, London.

Moderate	A building with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status
High	A building with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat.
Roost	Bats or evidence of bats recorded.

- 3.6 In many situations it is not possible to inspect all locations where bats may be present, or any bats that may be present, may not be visible at the time of the survey. Hence, an absence of bats does not necessary mean that a roost is not present and further activity surveys may be required to confirm presence or absence.

4.0 Baseline Conditions

Site Location

- 4.1 The site lies in a rural location to the south of the village of Lower Seagry. The wider farm complex comprises the main farmhouse and Grade II listed gatehouse/tithe barn with a number of modern agricultural barns within a large farmyard. The agricultural barn proposed for conversion lies on the northern edge of the farm complex. The River Avon lies 300m to the south of the barn.
- 4.2 The wider landscape predominately comprises agricultural and equestrian land, with a mix of arable and pasture/silage crop, interspersed by intensively managed hedgerows, with scattered mature trees. The M4 lies 900m to the south. A parcel of deciduous woodland and woodpasture/parkland – a priority habitat – lies 1.2km to the east, with parcels of floodplain grazing marsh to the north and south along the River Avon corridor.



Plate 1: Site Location

Data Search

Designated Sites

- 4.3 There are no statutory designated sites within 2km of the site and the site does not lie within any specific bat consultation zones or SSSI risk area.

Species

- 4.4 Three bat European Protected Species (EPS) licences were identified within 4km of the site. These included:
- Brown long-eared roost resting place 2.8km to the southwest (dated 2018-2019);
 - Common and soprano pipistrelle and brown long-eared bat resting place 2.29km to the north (dated 2016-2021); and
 - Common and soprano pipistrelle bat resting place 2.8km southwest dated (2015)

Habitats

- 4.5 No parcels of Priority Habitat have been identified within 500m of the Application Boundary.
- 4.6 No ponds have been identified within 250m. There are two visible on OS mapping within 250-500m of the site to the northeast and northwest.

Preliminary Ecological Appraisal

- 4.7 The Application Site predominately comprises hardstanding and buildings, which are described below. There is a small section of grassland to the west and rear (north of the barn) which is currently used for grazing. The field was of a level sward and dominated by rye grass *Lolium*, with some Yorkshire fog *Holcus lanatus* and false oat grass *Arrhenatherum elatius*. Forbs were limited at the time of the survey with cleavers *Galium aparine*, creeping buttercup *Ranunculus repens*, broad leaved dock *Rumex obtusifolius*, rib-wort plantain *Plantago lanceolata*, white clover *Trifolium repens*, dandelion *Taraxacum officinale* and chickweed *Stellaria media*. Whilst the survey was not conducted at the optimum time of year for vegetation, the habitats were consistent with well grazed and management pasture and the time of year is not considered to be a significant constraint.
- 4.8 A young hedgerow runs offsite along the fenceline with the boundary of the field, comprises hawthorn and blackthorn.



Plate 2: Application Boundary and Baseline Habtiats

- 4.9 The barn is a constructed of single skin breeze block with a shallow pitched asbestos sheet roof. There are large metal doors and timber windows on the southern elevation. The asbestos barge boards on the gables are well sealed albeit with ivy growth on the western gable.



Plate 3: Front (southern) elevation of the main barn

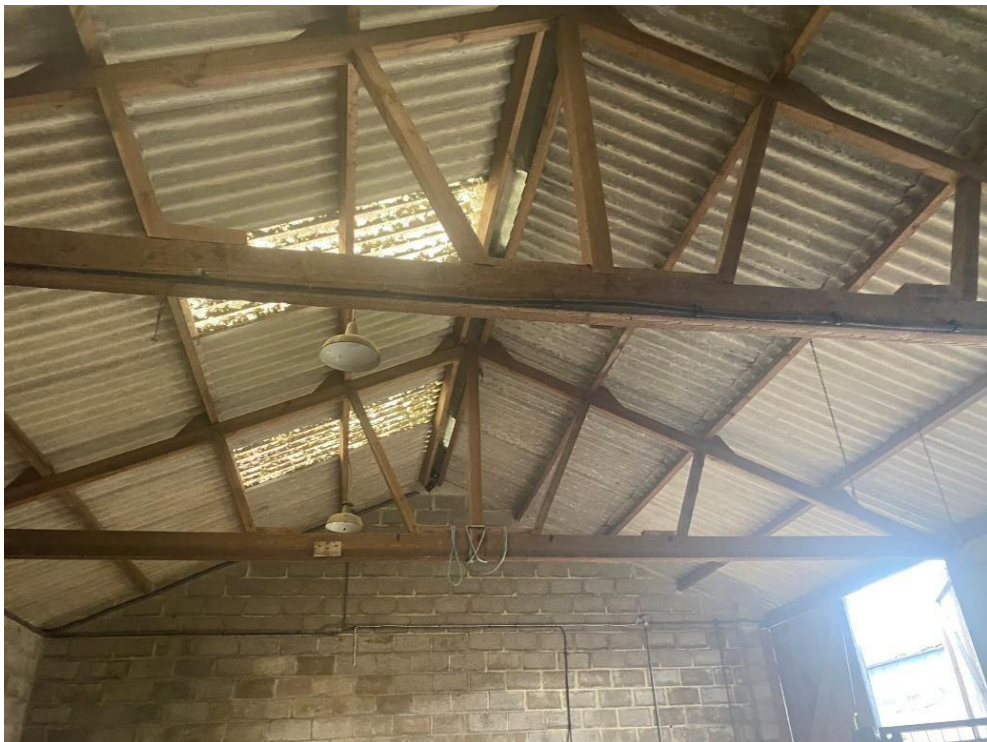


Plate 4: Interior view of the main barn

- 4.10 Internally, the barn is light and open to the asbestos roof, with the timber rafters. There is no separate roof void or any potential day roosting opportunities. No bats or evidence of bats was identified and the barn is considered to have negligible potential for the species. The open sided sheds adjoins the main barn on the eastern elevation. There are two sheds divided by a breeze

block wall. They are of the same construction as the main barn, with metal supports along the open fronted section. The sheds lack any potential roosting features and no bats or evidence of bats were noted. The sheds are considered to have negligible potential for bats.



Plate 5: Open sided barns to the east of the main barn

- 4.11 An old blackbird nest was noted on the defunct light fitting within the open sided barn. This building could also offer potential for species such as swallows. Precautionary working methods and enhancement measures have been included in the following section.
- 4.12 The cattle shed to the south of the yard are of a similar construction and opened sided to the north with an asbestos sheet roof and block wall. Again, this section is considered to offer negligible potential for bats.



Plate 6: Interior view of cattle shed looking north east across the farmyard and application site

Other Protected/Notable Species

- 4.13 Whilst the wider habitats surrounding the Application Site offer habitats for numerous species, given the small red line boundary/scale of the works and the minimal habitats that will be directly impacted, no further species surveys are recommended.
- 4.14 Precautionary and best practice construction methods have been set out below, together with recommendations for enhancements for species.

5.0 Avoidance, Mitigation and Enhancement Measures

- 5.1 The buildings are considered to offer negligible potential for roosting bats and hence no further surveys are required to inform the application.
- 5.2 In line with National and Local planning policies, developments should seek to ensure the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species populations. Therefore the following section sets out avoidance and mitigation measures that should be implemented, together with enhancement opportunities, with the aim of delivering a net gain in biodiversity.

Biodiversity Net Gain Assessment

- 5.3 As set out in Section 2, applications with a red line boundary of less than 0.2ha do not require a BNG assessment. There is still the expectation that there will be no net loss and developments should seek to provide ecological enhancements in line with local planning policies.

Other Mitigation Measures

- 5.4 The following mitigation measures will be implemented and can be also be secured within a planning condition:
- Any new lighting will need to be sensitively designed to avoid all impacts to the hedgerows/trees and adjacent buildings to ensure a dark continuous corridor is maintained. Any lighting should adhere to the principles set out in the ILP Guidance Note 08/18 Bats and artificial lighting in the UK⁸.
 - It is not anticipated that the proposals will require any vegetation clearance that could support nesting birds. However, the open sided barns had some evidence of nesting and may be used in the active season by species such as swallows. Therefore, works should avoid the nesting bird season, which is considered to be March to August, although swallows can continue to nest into the autumn. If works are to be undertaken during the active nesting season then a pre commencement inspection should be undertaken. If a nest is identified, an appropriate buffer will need to be implemented, or works should wait until the checks have fledged.
 - Foundation trenches and all excavations must either be covered overnight or must have scaffolding boards, or similar, placed within them to ensure that any animals that fall in are able to escape.
 - Raise stored materials (that might act as temporary resting places for species such as amphibians and reptiles) off the ground, e.g. on pallets.
 - Any close board fencing should have occasional gaps along the base of at least 13cm x13cm to allow movement of species such as hedgehog.

Species Enhancements

- 5.5 It is recommended that three in built bat boxes are installed. They should be positioned as high as possible on the south/southeast elevation and away from windows, door or any light sources. Three universal swift boxes should also be installed on each new unit. These bird boxes should be positioned at least 6-7m in height on the north/northwestern elevation, again, away from any window and light sources.
- 5.6 There are minimal opportunities to incorporate habitat enhancements due to the spatial restrictions of the red line, but where feasible/applicable, wildlife friendly garden plant species could be used, together with a more diverse lawn mixture.

- 5.14 Taking the above into account, the Application Site is considered to be of low ecological value and the proposed development does not contravene the local planning policies and will seek to deliver a net gain in biodiversity in line NPPF

