

Preliminary Ecological Appraisal



Tyler
Grange

**Stour Power - Heat Project,
Stourhead
9th December 2025**

TG Report No. 18229_R01a_JS

Project No:	Report No.	Date	Revision
18229	R01a	9th December 2025	A
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Contents:

Summary	
Section 1: Introduction	2
Section 2: Ecological Features and Potential Impacts, Mitigation, and Enhancement	4
Section 3: Conclusions and Recommended Further Work	12

Appendices:

- Appendix 1: Legislation and Planning Policy
- Appendix 2: Methodology and Results
- Appendix 3: Badger Legislation, Methodology and Results

Plans:

- Plan 1: Habitat Features Plan 18229/P01



Summary

- S.1. This report has been prepared by Tyler Grange Group Ltd on behalf of the National Trust. It presents the findings of a Preliminary Ecological Appraisal at the National Trust Stourhead site, Stourton, Warminster, BA12 6QD ('the site').
- S.2. The report describes the important ecological features that could be affected by the proposed development, identified through desk study and a site survey; outlines known potential ecological constraints for planning; and identifies opportunities for ecological enhancements.
- S.3. The site comprises several small parcels of modified grassland and low-lying scrub associated with existing National Trust facilities. The proposal is for the installation of air source heat pump systems and a new transformer to provide energy-efficient heating. Trenching for cables is not included in this assessment.
- S.4. One statutory designated Site of Special Scientific Interest (Heath Hill Farm SSSI) and one Local Wildlife Site (Bonham Hanging LWS) are within 2 km of the site. Impacts to these designated sites are not anticipated, and consultation with Natural England is not required.
- S.5. The majority of the site comprises modified grassland of negligible ecological importance, with some mixed scrub of site-level importance.
- S.6. Habitats within the site provide limited opportunities for protected species including amphibians, badger, bats, birds, dormice and reptiles. The scale and quality of habitat are generally low, but precautionary measures are recommended in respect to nesting birds. No further protected species surveys are considered necessary, but ecological supervision during works is advised.
- S.7. The proposed development is very small in scale and meets the criteria for exemption from mandatory BNG under the Biodiversity Gain Requirements (Exemptions) Regulations 2024. The works will impact less than 25m² of habitat and less than 5m of linear habitat.
- S.8. Although not required to deliver BNG, the report recommends habitat retention where possible, new native planting, and features such as nest boxes and refugia to enhance biodiversity post-development.
- S.9. No issues have been identified that could affect the principle or significantly affect the quantum of development the site could support. With the recommendations and further work set out in this report, the site can be developed in accordance with relevant planning policy and legislation.



Section 1: Introduction

Introduction

- 1.1. This report has been prepared by Tyler Grange Group Ltd on behalf of the National Trust. This report sets out the findings of a Preliminary Ecological Appraisal at the National Trust Stourhead site, Stourton, Warminster, BA12 6QD (OS Grid Reference ST 77688 33841), hereafter referred to as 'the site'. See **Figure 1.1** for the indicative red line boundaries.



Figure 1.1. Indicative red line boundaries (indicative and not to scale) (© Google Aerial Imagery)

Site Context

- 1.2. The site boundaries comprise several small parcels in association with the existing National Trust facilities across the National Trust Stourhead site. These areas comprise small parcels of modified grassland and low-lying scrub (see **Plan 1**).

Development Proposals

- 1.3. The proposals for the site comprise the installation of air source heat pump systems and a new transformer that connects to existing infrastructure within the Stourhead site to provide energy efficient heating to the National Trust Stourhead site.
- 1.4. The trenching to facilitate the laying of new electrical cables will be evaluated within a separate assessment and, as such, is not included within this report.

Purpose

- 1.5. This report:



- Uses available background data and results of the field surveys to describe and evaluate the ecological features present within the likely “Zone of Influence”¹ (Zoi) of potential development of the site; and
- With reference to relevant planning policy and legislation (**Appendix 1**), describes the actual or potential ecological issues and opportunities that might arise as a result of the site’s development, or identifies issues that could affect the principle or quantum of development the site could support.

1.6. This assessment and the terminology used are consistent with the Guidelines for Preliminary Ecological Appraisal².

Methodology

1.7. Full methods for the data search, phase 1/UK Habitat Classification (UK Habs) survey, PRA and BNG work can be found in **Appendix 2**.

Quality Control

1.8. All ecologists at Tyler Grange Group Limited are members of the Chartered Institute of Ecology and Environmental Management (CIEEM) or are working towards membership and act under the direction of members, and abide by the Institute’s Code of Professional Conduct³.

Limitations

1.9. It is considered that there were no limitations to the surveys detailed within this report.

¹ Defined by the CIEEM (2018) Guidelines for Ecological Impact Assessment as the area over which ecological features may be affected by biophysical changes as a result of the proposed project and associated activities. This is likely to extend beyond the project site, for example where there are ecological or hydrological links beyond the site boundaries

² CIEEM (2017) Guidelines for Preliminary Ecological Appraisal, 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.

³ CIEEM (2022) Code of Professional Conduct, CIEEM, Winchester



Section 2: Ecological Features and Potential Impacts, Mitigation, and Enhancement

Designated Sites

- 2.1. The data search returned one statutory and one non-statutory designated site within 2 km of the site. These are detailed in **Table 2.1** over the page, along with potential impacts and mitigation measures which may be required.
- 2.2. No other statutory or non-statutory designated sites are located within 2 km of the site, and no special areas of conservation (SAC), special protection areas (SPA) or Ramsar sites are located within 10 km of the site.



Table 2.1. Designated Sites

Designated site	Distance and direction from site	Citation	Potential Impacts and Requirement for Mitigation	Ecological Importance
Heath Farm Hill Site of Special Scientific Interest (SSSI)	1.6 km west	Heath Hill Farm comprises a number of adjacent hay meadows and permanent pastures, which support floristically rich unimproved neutral to calcareous grassland, and rush pasture, in a mosaic with semi-improved and improved grassland.	The site falls into the SSSI Impact Risk Zone for Heath Hill Farm SSSI. However, the development does not fall into any of the criteria set out by Natural England requiring further assessment, such as residential development of 100 units or more. As such consultation with Natural England is not considered necessary, and this is not discussed further within this report.	National
Local Wildlife Sites (LWS)	0.4 km west at the closest point	12 LWS are located within 2 km of the site, the closest of which is the Bonham Hanging LWS, located 0.4 km west of the site. Bonham Hanging LWS is a broadleaved and coniferous plantation woodland on an ancient site on a steep west-facing slope on the Stourhead estate.	Standard construction safeguards, such as those in relation to noise, vibration, dust and contaminated run-off should be implemented to ensure that no impacts occur to any adjacent habitats and protected sites, or any other off-site receptors within the study area.	Local

Habitats and Protected Species

- 2.3. The habitats and presence of, or potential for, protected species that could be affected by the proposed development are summarised below in **Tables 2.2** and **2.3 respectively**. Species which are considered likely absent from the site based on professional judgement following consideration of the habitats within the site, signs of species presence at the time of survey and data search records, are not discussed. The locations of habitats are shown on the Habitats Features Plan **18229/P01**.



Table 2.2. Habitats, their Importance, Potential Impacts and Mitigation/Enhancement Opportunities

Habitats	Description and Species	Ecological Importance	Photograph
<u>Primary code:</u> Modified grassland g4 <u>Secondary code(s):</u> Mown 106	Areas of modified grassland were present across the site to providing amenity open spaces. These areas were intensively managed and appeared to be mown on a regular basis, and evidence of trampling was present in places. Species within the sward were very limited, with these areas dominated by Yorkshire fog <i>Holcus lanatus</i> and perennial rye <i>Lolium perenne</i>, along with occasional white clover <i>Trifolium repens</i>, daisy <i>Bellis perennis</i>, and dandelion <i>Taraxacum sp</i>, Nettles were also present adjacent to most of these areas, beyond the extent of the mown areas.	This habitat is maintained for its amenity value, rather for that of biodiversity, and is considered to be of negligible ecological importance.	
<u>Primary code:</u> Mixed scrub h3h <u>Secondary code(s):</u> Scattered scrub 10	The rear areas behind the existing buildings comprise patches of mixed scrub. Species present within the scrub margins include dogwood <i>Cornus sanguinea</i>, hawthorn <i>Crataegus monogyna</i>, holly, blackthorn <i>Prunus spinosa</i>, hazel <i>Corylus avellana</i>, field maple <i>Acer campestre</i>, cherry laurel <i>Prunus laurocerasus</i>, and elder <i>Sambucus nigra</i>. Parts of the scrub habitats appeared managed to maintain their accessibility. Ground flora within these areas was dominated by nettles <i>Urtica dioica</i>, along with bracken <i>Pteridium aquilinum</i>, creeping buttercup <i>Ranunculus repens</i>, ivy <i>Hedera helix</i> and bramble.	Mixed scrub habitats are widespread and common within the wider landscape, as such this habitat is considered to be of no more than site ecological importance.	

Table 2.3. Fauna (including Protected/Priority Species) their Importance, Potential Impacts and Mitigation/Enhancement Opportunities

Fauna (including Protected/Priority Species)	Data Search Results	Site Survey/Suitability for Protected Species	Constraints	Potential Impacts and Mitigation/Enhancement Opportunities	Ecological Importance
Amphibians	The data search returned one record of common toad <i>Bufo bufo</i> within 2 km of the site. This record of common toad was approx. 1.45 km west of the site in 2024. No records of great crested newt (GCN) <i>Triturus cristatus</i>, nor any European Protected Species (EPS) licences were returned for GCN within 2 km of the site.	The terrestrial habitats on site could offer some suitable habitat for GCN, however this is limited areas of mixed scrub. Other more mobile amphibian species such as common toad may be present within the site. Common toads are a priority species under the Natural Environment and Rural Communities (NERC) Act 2006. It is considered any population utilising terrestrial habitats on site will also be using further habitats beyond the site boundary and not reliant site alone.	Impacts to these habitats should be avoided or minimised where possible.	It is recommended that removal of suitable terrestrial habitats for amphibians is supervised by a suitably experienced Ecological Clerk of Works (ECoW) to avoid potential impacts to these species. The planting of new native scrub and pond or scrape creation within the site could provide new habitats of importance for amphibians. The creation of hibernacula would provide new areas of refugia for amphibians.	Owing to the lack of records within the local area, unsuitable waterbodies and limited terrestrial habitat, GCN considered likely absent from the site and are not discussed further within the report. Any population of common amphibians, such as common toad on site, would be of negligible ecological importance.
Badger	Six records of badger <i>Meles meles</i> were recorded within 2km of the site. The nearest record was 0.66 km southwest of the site.	The majority of the site provides suitable habitat for badger for commuting, foraging or sett building across the grassland and scrub, although no evidence of badger or their setts was recorded during the site survey.	Impacts to these habitats or minimised should be avoided where possible. An update survey for badgers is recommended within two weeks of commencement of on-site works.	If an active badger sett is recorded on site or within 30 m of the development area, a licence for disturbance from Natural England may be required before works can be undertaken. New native scrub or hedgerow planting would provide badger with additional foraging opportunities.	Given the extent of suitable habitat in the wider area for badger, it is not considered that any population of badgers would be reliant upon the site alone. It is therefore considered that the any population of badger utilising the site is of no more than site ecological importance.
Birds	The data search returned a number of records of protected and notable birds species within 2 km of the site. Of these, species of relevance to the site include lapwing <i>Vanellus vanellus</i>, skylark <i>Alauda arvensis</i>, hawfinch <i>Coccothraustes coccothraustes</i>, corn bunting <i>Emberiza calandra</i> and yellowhammer <i>Emberiza citronella</i>.	Habitats on site, such as the scrub, have the potential to support common and widespread nesting birds and unlikely to support protected and notable species.	Removal of these habitats should be avoided during the nesting season (March to September inclusive, though these dates are not defined in law and birds may nest outside of this time) wherever possible.	Should any of these habitats be cleared during the nesting bird season, pre-removal checks for nesting birds must be carried out by a suitably experienced ECoW, no more than 48 hours prior to the works commencing. New native hedgerow, tree or scrub planting would provide new habitat of importance for birds, and new nesting boxes would provide new roosting opportunities.	It is considered the assemblage of birds that may use the site for foraging and breeding is of negligible ecological importance.

Bats	The data search returned records for thirteen bat species within 2 km of the site. Including: • Barbastelle <i>Barbastella barbastellus</i>; • Bechstein's bat <i>Myotis bechsteinii</i>; • Brandt's Bat <i>Myotis brandtii</i>; • Brown long-eared bat <i>Plecotus auritus</i>; • Common pipistrelle <i>Pipistrellus pipistrellus</i>; • daubenton's bat <i>Myotis daubentoniid</i>; • Greater horseshoe bat <i>Rhinolophus ferrumequinum</i>; • Lesser horseshoe bat <i>Rhinolophus hipposideros</i>; • Natterer's bat <i>Myotis nattereri</i>; • Noctule <i>Nyctalus noctule</i>; • Serotine <i>Eptesicus serotinus</i>; • Soprano pipistrelle <i>Pipistrellus pygmaeus</i>; and • Whiskered bat <i>Myotis mystacinus</i>. The nearest of these was a record of lesser horseshoe bat approx. 0.3 km west of the site in 2025. In addition, two granted EPS licences for bats were returned within a 2 km radius of the site. The closest licence was adjacent to the northern boundary of the site (case reference: 2016-21127-EPS-AD2) and was granted for the damage of a breeding and resting place for brown long-eared and lesser horseshoe bats in 2016.	The habitats present within the site are of too small a scale to provide any real value to bat assemblages.	No constraints are provided by this species group. No artificial lighting is proposed.	Native species planting in unlit areas, including linear features, may enhance the site for commuting and foraging bats. Inclusion of bat boxes in the scheme would enhance the site for roosting bats.	The habitats present within the site are common within the wider area and do not provide any specific features or habitats that would not be readily available to bats within the near vicinity of the site. Any population of bats utilising the site is anticipated to be of negligible ecological importance.
Dormice	119 records of hazel dormouse <i>Muscardinus avellanarius</i> were returned within 2km of the site the closest being approx. 0.18km west in 2009. No EPS licences were recorded within 2km of the site.	The areas of scrub adjacent to the buildings may provide suitable habitat for dormice, however these areas predominantly comprised low-lying scrub habitat and are very small in scale, so the suitability is limited.	Impacts to these habitats or minimised should be avoided where possible. Dormice are known to be present in the local area.	Owing to the very small scale of the development and habitat to be impacted, any works within the scrub should be preceded by a check by a suitably qualified ecologist for the presence of dormice. A precautionary method of works should then be followed. It is not considered necessary that a Natural England Licence for dormice is required to facilitate the works. The planting of new native hedgerow and scrub would provide new habitat of importance for dormice within the site.	More suitable habitat for dormice is available within the wider area, and it is considered that any population of dormice would not be reliant upon the site alone. Any population present is therefore considered to be of site ecological importance.

Reptiles	The data search returned the records of four reptile species, including one record of slow worm <i>Anguis fragilis</i> , one record of adder <i>Vipera berus</i> , two records of grass snake <i>Natrix helvetica</i> and five records of common lizard <i>Zootoca vivipara</i> . Of these, the closest to the site was a common lizard, recorded in 2024 c. 0.2 km northwest of the site.	The majority of the site in its current state is unsuitable for reptiles, however the scrub margins provide limited suitable habitat.	Impacts to these habitats should be avoided or minimised where possible. If these habitats are to be lost or impacted, supervision by a suitably experienced ECoW should be undertaken to avoid impacts to reptiles.	Impacts to suitable habitats should be avoided wherever possible. The site may be enhanced by native species planting and inclusion of reptile refugia in the scheme design.	Given the extent of suitable reptile habitat within the wider area, any population of reptiles present within the site is considered to be of no more than site ecological importance .
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Biodiversity Net Gain

Design Evolution

2.9. The design of the Development should be iterative, and in accordance with policy and best practice guidance, follow the 'mitigation hierarchy'. As such, the Development should be designed to avoid and retain the most important ecological features to ensure they can be managed in the long-term to enhance their importance for biodiversity. Where this is not possible, new habitats should be proposed to compensate for habitat losses with the aim of maximising the ecological value of the habitats proposed on the site. Our recommendations for the design strategy are as follows:

- The development has been reduced to as small a scale as possible to ensure that impacts to habitats of importance are avoided.
- All impacts within the site are limited to development within the areas of scrub and modified grassland which are of low ecological importance within the context of the site.

Approach to BNG

2.10. The proposed development is very small in scale, being limited to the footprints of new air source heat pumps and the new transformer.

2.11. With the above in mind, the site is considered exempt from the requirement to deliver a net gain in biodiversity under the *de minimis* exemption of the Biodiversity Gain Requirements (Exemptions) Regulations 2024⁴:

"(1) The biodiversity gain planning condition does not apply in relation to planning permission for development which meets the first and second conditions.

(2) The first condition is that the development does not impact an onsite priority habitat.

(3) The second condition is that the development impacts—

(a) less than 25 square metres of onsite habitat that has biodiversity value greater than zero; and

(b) less than 5 metres in length of onsite linear habitat."

2.12. It is considered that both of the above criteria of the exemption are met, in that there is no priority habitat within the site, and the proposals will impact less than 25m² of habitat with a value greater than zero, and less than 5m of linear habitat.

2.13. Therefore, the proposed works can be considered exempt from the biodiversity net gain planning condition and are not required to provide a Biodiversity Net Gain Assessment report or calculations metric as part of the proposed planning application.

⁴ The Biodiversity Gain Requirements (Exemptions) Regulations 2024. Available at: <https://www.legislation.gov.uk/uksi/2024/47/regulation/4/made> [Accessed 22/10/2025].



Section 3: Conclusions and Recommended Further Work

Key Issues

- 3.1. The key ecological considerations of the development are as follows.
- The site is not covered by any statutory or non-statutory designations. Although the site is located within the IRZ for the Heath Hill Farm SSSI, the proposals do not meet any of the identified impact pathways, and consultation with Natural England is not necessary.
 - The impacts of the proposals are small in scale, and it is considered that any potential impacts are limited to nesting birds.
 - Ecological supervision during the works is recommended as a precautionary measure to ensure no impacts to protected species occur.
 - The installation of bat or bird boxes onto the buildings adjacent to the site could provide new features of importance to bats and birds as ecological enhancements.

Potential Further Work

- 3.2. No further survey work in respect to protected species is considered necessary.
- 3.3. Ecological supervision is recommended prior to and during the works on site, to insure that impacts to any protected species, namely nesting birds, is avoided.

Potential Control Mechanisms

- 3.4. A precautionary method of working will be followed throughout any habitat clearance required, with supervision provided by a suitably qualified ecologist / ecological clerk of works as necessary.

Conclusion

- 3.5. No issues that could affect the principle or significantly affect the quantum of development the site could support have been identified. With the recommendations and further work set out in this report, there can be confidence that the site could be developed in accordance with relevant planning policy and legislation.



Appendix 1: Legislation and Planning Policy

Legislation

- A1.1. Specific habitats and species receive legal protection in the UK under various pieces of legislation, including:
- The Environment Act 2021;
 - The Wildlife and Countryside Act (WCA) 1981 (as amended);
 - The Conservation of Habitats and Species Regulations 2017 (as amended);
 - The Countryside and Rights of Way (CROW) Act 2000;
 - The Natural Environment and Rural Communities Act (NERC) 2006;
 - The Hedgerows Regulations 1997; and
 - The Protection of Badgers Act 1992.
- A1.2. The European Council Directive on the Conservation of Natural Habitats and of Wild Flora and Fauna, 1992, often referred to as the 'Habitats Directive', provides for the protection of key habitats and species considered of European importance. Annexes II and IV of the Directive list all species considered of community interest. The legal framework to protect the species covered by the Habitats Directive has been enacted under UK law through The Conservation of Habitats and Species Regulations 2017 (as amended).
- A1.3. In Britain, the WCA 1981 (as amended) is the primary legislation protecting habitats and species. SSSIs, representing the best examples of our natural heritage, are notified under the WCA 1981 (as amended) by reason of their flora, fauna, geology or other features. All breeding birds, their nests, eggs and young are protected under the Act, which makes it illegal to knowingly destroy or disturb the nest site during nesting season. Schedules 1, 5 and 8 afford protection to individual birds, other animals and plants.
- A1.4. The CROW Act 2000 strengthens the species enforcement provisions of the WCA 1981 (as amended) and makes it an offence to 'recklessly' disturb a protected animal whilst it is using a place of rest or shelter or breeding/nest site.

Environment Act 2021: Upcoming Town and Country Planning Act

- A1.5. The Environment Act gained Royal Assent in November 2022. Whilst the premise of BNG has been around prior to this, the Assent of the Act sets the Framework for future legislation to be changed. This will be in the form of the Town and Country Planning Act (TaCPA), specifically Schedule 14 of the TaCPA, which will make Biodiversity Net Gain a condition of planning (not a planning condition). The target 'gain' is currently set at 10% but the Secretary of State has the ability to change this.



- A1.6. The timescales for changes to the wording of the TaCPA are that it will be legally mandated and enforceable from January 2024.

Natural Office of the Deputy Prime Minister (ODPM) Circular 06/2005: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System

- A1.7. ODPM Circular 06/05 was prepared to accompany PPS9, however continues to be valid, and material in the consideration of planning applications since PPS9's replacement by the NPPF.
- A1.8. ODPM Circular 06/05 provides guidance on applying legislation in relation to nature conservation and planning in England. Part I considers the legal protection and conservation of internationally designated sites (namely candidate Special Areas of Conservation (cSACs), SACs, potential Special Protection Areas (pSPAs), SPAs and Ramsar sites) and Part II considers the legal protection and conservation of nationally designated sites, namely Sites of Special Scientific Interest (SSSIs).
- A1.9. Part III considers the protection of habitats and species outside of designated areas (particularly UK Biodiversity Action Plan species and habitats, which it states are capable of being a material consideration in the preparation of local development documents and the making of planning decisions.
- A1.10. Part IV considers species protected by law and states that the presence of a protected species is a material consideration in the consideration of a development proposal that, if carried out, would be likely to result in harm to the species or its habitat and that it is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted.

National Planning Policy

National Planning Policy Framework (NPPF), December 2024

- A1.11. The National Planning Policy Framework (NPPF) was published in December 2024 and sets out the Government's planning policies for England and how these should be applied. It replaces the previous National Planning Policy Framework published in March 2012 and December 2023.
- A1.12. Paragraph 11 states that:
- “Plans and decisions should apply a presumption in favour of sustainable development.”
- A1.13. Section 11 of the NPPF, paragraph 125, sub-section a) states that planning policies and decisions should:
- a) *“encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;*
 - b) *recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production”*



- A1.14. Section 13 refers to development in the Green Belt and introduces 'Golden Rules' that, at paragraph 159, state how such development should *"support nature's recovery" and "where land has been identified as having particular potential for habitat creation or nature recovery within Local Nature Recovery Strategies, proposals should contribute towards these outcomes"*.
- A1.15. Section 15 of the NPPF (paragraphs 187 to 195) considers the conservation and enhancement of the natural environment.
- A1.16. Paragraph 187 states that planning and decisions should contribute to and enhance the natural and local environment by:
- a) *"protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
 - b) *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
 - c) *maintaining the character of the undeveloped coast, while improving public access to it where appropriate; and*
 - 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"*
- A1.17. Paragraph 188 states that 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.
- A1.18. Paragraph 192 states that in order 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 biodiversity⁵; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation⁶; 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."*

⁵ Circular 06/2005 provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system.

⁶ Where areas that are part of the Nature Recovery Network are identified in plans, it may be appropriate to specify the types of development that may be suitable within them.



A1.19. When determining planning applications, Paragraph 193 states that 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 reasons⁷ and a suitable compensation strategy exists; and*
- d) *development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate."*

A1.20. As stated in paragraph 187 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 sites⁸; and*
- c) *sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites."*

A1.21. Paragraph 195 states that

"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".

Local Planning Policy

Wiltshire Core Strategy 2015

A1.22. The Wiltshire Core Strategy Development Plan Document was formally adopted on 20th January 2015. The plan provides a positive and flexible overarching planning policy framework for Wiltshire

⁷ For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.

⁸ Potential Special Protection Areas, possible Special Areas of Conservation and proposed Ramsar sites are sites on which Government has initiated public consultation on the scientific case for designation as a Special Protection Area, candidate Special Area of Conservation or Ramsar site.



for the period up to 2026. Core Policy 50: Biodiversity and Geodiversity relates to ecology and nature conservation and is summarised as follows:

A1.23. Core Policy 50: Biodiversity and Geodiversity

'Protection

Development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term. Where it has been demonstrated that such features cannot be retained, removal or damage shall only be acceptable in circumstances where the anticipated ecological impacts have been mitigated as far as possible and appropriate compensatory measures can be secured to ensure no net loss of the local biodiversity resource, and secure the integrity of local ecological networks and provision of ecosystem services.

All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development.

Any development potentially affecting a Natura 2000 site must provide avoidance measures in accordance with the strategic plans or guidance set out in paragraphs 6.75-6.77 above where possible, otherwise bespoke measures must be provided to demonstrate that the proposals would have no adverse effect upon the Natura 2000 network. Any development that would have an adverse effect on the integrity of a European nature conservation site will not be in accordance with the Core Strategy.

Biodiversity enhancement

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

Local sites

Sustainable development will avoid direct and indirect impacts upon local sites through sensitive site location and layout, and by maintaining sufficient buffers and ecological connectivity with the wider environment. Damage or disturbance to local sites will generally be unacceptable, other than in exceptional circumstances where it has been demonstrated that such impacts:

- i. cannot reasonably be avoided*
- ii. are reduced as far as possible*
- iii. are outweighed by other planning considerations in the public interest*
- iv. where appropriate compensation measures can be secured through planning obligations or agreements.*



Development proposals affecting local sites must make a reasonable contribution to their favourable management in the long-term.'

Biodiversity Actions Plans⁹

A1.24. The Wiltshire Biodiversity Action Plan 2008 includes habitat and species action plans for Wiltshire. This includes the following habitats and species relevant to the site:

- Woodland;
- Wood-pasture, Parkland and Ancient Trees;
- Ancient and/or Species-rich Hedgerows;
- Farmland Habitat;
- Rivers, Streams and Associated Habitats;
- Bats;
- Water Vole;
- Otter;
- Brown Hare;
- Hazel Dormouse;
- Skylark;
- Kingfisher;
- Linnet;
- Quail;
- Grey Partridge;
- Bullfinch
- Song Thrush;
- Barn owl;
- Lapwing; and
- Great Crested Newt.

⁹ Wiltshire Biodiversity Action Plan(2008) Available at: <https://www.wiltshirewildlife.org/sites/default/files/2022-08/wiltshirebap2008%281%29.pdf> [accessed 13/03/2024]



Appendix 2: Methodology and Results

Data Search

- A2.1. A desk-based study was conducted whereby records of designated sites and records of protected and priority species were purchased and interrogated for the site and the surrounding landscape. The aim of the data search is to collate existing ecological records for the site and adjacent areas. Obtaining existing records is an important part of the assessment process as it provides information on issues that may not be apparent during a single survey, which by its nature provides only a 'snapshot' of the ecology of a given site.
- A2.2. The following resources were consulted/contacted:
- Multi-Agency Geographic Information for the countryside (MAGIC) website¹⁰;
 - Wiltshire & Swindon Biological Records Centre (WSBRC)¹¹; (Data ordered on 03/09/2025 and received on 12/09/2025);
 - Wiltshire Council website¹²;
 - Joint Nature Conservation Committee (JNCC) website¹³,
 - Natural England (NE) designated sites website¹⁴,
 - Ordnance Survey mapping; and
 - Google Maps, including aerial photography.
- A2.3. The following areas of search around the boundary of the site boundary were applied:
- 2 km for protected and priority species, national statutory designated and non-statutory sites; and
 - 10 km for European statutory sites.

'Extended' Phase I Survey and UK Habs

- A2.4. An 'extended' Phase 1 survey was carried out on the 13th of August 2025 by Joseph Small BSc (Hons), a suitably experienced ecologist and qualifying member of CIEEM. The methods used during the walkover survey broadly followed methods used in an 'extended' Phase I habitat survey¹⁵ and entailed recording the main plant species and classifying and mapping habitat types

¹⁰ <https://magic.defra.gov.uk/> [Accessed 12/08/2025]

¹¹ <https://www.wsbr.org/> [Accessed: 03/09/2025]

¹² <https://www.wiltshire.gov.uk/> [Accessed 03/09/2025]

¹³ <http://jncc.defra.gov.uk/ProtectedSites/> [Accessed 03/09/2025]

¹⁴ <https://designatedsites.naturalengland.org.uk/> [Accessed 12/08/2025]

¹⁵ Joint Nature Conservation Committee (2010). Handbook for Phase 1 habitat survey - a technique for environmental audit. JNCC, Peterborough.



with reference to the Habitat Definitions provided by the UK Habitat Classification Working Group¹⁶.

- A2.5. Additionally, the habitats identified were evaluated for their potential to support legally protected and notable fauna species. Where access allowed, adjacent habitats were also considered in order to assess the site within the wider landscape and to provide information with which to assess possible impacts within the context of the site boundary.
- A2.6. All habitats were assessed utilising the relevant condition criteria for the relevant habitat type under the Statutory Biodiversity Metric which included confirming 'pass' / 'fail' criteria taken from the UK Habitat/Phase 1 methodology where necessary.

Preliminary Bat Surveys

- A2.7. The surveys followed standard methodologies set out in the Bat Mitigation Guidelines¹⁷, the Bat Workers Manual¹⁸ and Bat Surveys for Professional Ecologists- Good Practice Guidelines 4th Edition¹⁹ and comprised:
- Preliminary Roost Assessment (PRA) – External and internal building inspection survey to assess potential of buildings on site to support roosting bats;
 - Ground Level Tree Assessment (GLTA) – Ground level inspection of trees to assess potential of trees on site to support roosting bats; and
 - Day-time Bat Walkover (DBW) – Walkover of the sites to assess potential bat activity including foraging areas and potential commuting routes.

Ground Level Tree Assessment (GLTA)

- A2.8. A GLTA was undertaken on all trees within the Site boundary. The assessment was undertaken on 13th of August 2025 by Joseph Small BSc (Hons). All surveys were daytime inspections and the conditions for all surveys was considered optimal. All trees were inspected from the ground using binoculars, high powered torch and digital camera for accessible features. Potential Roosting Features (PRFs) of interest include at detailed in **Table A2.1** below.

Table A2.1: PRF Types that can be Exploited by Bats and How they Form - adapted from Collins, 2023.

PRFs formed by disease and decay	PRFs formed by damage	PRFs formed by association
Woodpecker Holes Squirrel Holes Knot Holes Pruning Cuts	Lightning Strikes Hazard Beams Subsidence Cracks Shearing Cracks Transverse Snaps	Fluting Ivy

¹⁶ UKHab Ltd. (2023). UK Habitat Classification Version 2.0 (at <https://www.ukhab.org>)

¹⁷ Reason, P.F. and Wray, S. (2023). UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Chartered Institute of Ecology and Environmental Management, Ampfield.

¹⁸ Mitchell-Jones, A.J., & McLeish, A.P. (eds). (2004) 3rd Edition Bat Workers' Manual., JNCC, Peterborough, ISBN 1 86107 558 8

¹⁹ Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th Edition). The Bat Conservation Trust, London. ISBN-978-1-7395126-0-6



Tear Outs Wounds Cankers Compression Forks Butt Rots	Welds Lifting Bark Desiccation Fissures Frost Cracks	
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A2.9. The potential of trees to support roosting bats was assessed using the criteria shown in **Table A2.2** below.

Table A2.2: Assessment of Tree Suitability Criteria - adapted from Collins, 2023.

Roost Suitability	Description of Roosting Habitat
NONE	Either no PRFs in the tree or highly unlikely to be any.
FAR	Further assessment required to establish if PRFs are present in the tree.
PRF	A tree with at least one PRF present.

Day-time Bat Walkover (DBW)

A2.10. A DBW was undertaken on all habitats within the Site boundary. The assessment was undertaken on 13th of August 2025 by Joseph Small BSc (Hons). All surveys were daytime inspections and the conditions for all surveys were considered optimal. The DBW assessed habitats on-site for the likelihood to be used by foraging and commuting bats as detailed in **Table A2.3** below. This combined with desk study records of local bats and bat roosts, and potential for roosting bats on-site is used to determine suitability of the site for bat activity.

Table A2.3: Flight Path and Foraging Habits Assessment Criteria - adapted from Collins, 2023.

Suitability	Description of Roosting Habitats
None	No habitat features on site likely to be used by any commuting or foraging bats at any time of the year (i.e. no habitats that provide continuous lines of shade/protection for flight-lines, or generate/shelter insect populations available to foraging bats).
Negligible	No obvious habitat features on site likely to be used as flight-paths or by foraging bats; however, a small element of uncertainty remains in order to account for non-standard bat behaviour.
Low	Habitat that could be used by small numbers of bats as flight-paths such as a gappy hedgerow or unvegetated stream, but isolated, i.e. not very well connected to the surrounding landscape by other habitat. Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub.
Moderate	Continuous habitat connected to the wider landscape that could be used by



Suitability	Description of Roosting Habitats
	bats for flight-paths such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.
High	Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by bats for flight-paths such as river valleys, streams, hedgerows, lines of trees and woodland edge. High-quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses and grazed parkland. Site is close to and connected to known roosts.

Evaluation

- A2.11. The evaluation of habitats and species is defined in accordance with published guidance²⁰. The scale of importance of each ecological feature is assigned within a defined geographical context, namely international and European, national, regional, county, and local. Below these are features considered to be of negligible importance.
- A2.12. Consideration will also be given to legally protected or controlled species which are 'important features' in the context of this assessment, for which mitigation measures are required to ensure legal compliance, regardless of their geographic scale of importance. Thus, it is possible for a feature of negligible ecological importance to be legally protected and hence require mitigation.
- A2.13. Evaluation is based on various characteristics that can be used to identify ecological features likely to be important in terms of biodiversity. These include site designations (such as Sites of Species Scientific Interest (SSSIs), or for undesignated features, the size, conservation status (locally, nationally or internationally), and the quality of the ecological feature. In terms of the latter, quality can refer to habitats (for instance if they are particularly diverse, or a good example of a specific habitat type), other features (such as wildlife corridors or mosaics of habitats) or species populations or assemblages.



Appendix 3: Badger Legislation, Methodology and Results

Legislation and Conservation Status

- A3.1. The Protection of Badgers Act 1992 consolidates the previous Badger Acts of 1973 and 1991. The legislation aims to protect the species from persecution, rather than being a response to an unfavourable conservation status. As well as protecting the animal itself, the 1992 Act also makes the intentional or reckless destruction, damage, or obstruction of a badger sett an offence.
- A3.2. A sett is defined as 'any structure or place which displays signs indicating current use by a badger'. In addition, the intentional elimination of sufficient foraging area to support a known social group of badgers may, in certain circumstances, be construed as an offence by constituting 'cruel ill treatment' of a badger. Badgers are not the subject of conservation action.
- A3.3. Due to the continued persecution of this species, all details relating to the location of badger setts must be kept out of the public domain and not submitted to any public portal as part of the application submission.

Badger Surveys

- A3.4. A badger survey was undertaken at the site, and within 30m, where accessible, on 13th of August 2025 by Joseph Small BSc (Hons). This survey comprised two main elements, the first of these was a thorough search for evidence of badger setts. If any setts were encountered each sett entrance was noted and plotted even if the entrance appeared disused.
- A3.5. The number of holes comprising each sett was recorded and setts classified as disused, partially used or active. Sett descriptions and categories of use are set out in **Tables A3.1** and **A3.2** below.
- A3.6. Sett classification is only possible in relation to the other setts within a clan's territory and if the entire territory range cannot be assessed, classification may not be possible.
- A3.7. The following information was recorded:
- The number and location of well used or very active entrances; these are clear from any debris or vegetation and are obviously in regular use and may, or may not, have been excavated recently;
 - The number and location of partially-active entrances; these are not in regular use and have debris such as leaves and twigs in the entrance or have plants growing in or around the edge of the entrance; and
 - The number of disused entrances; these have not been in use for some time, are partly or completely blocked and cannot be used without considerable clearance. If the entrance has been disused for some time all that may be visible is a depression in the ground where the hole used to be and the remains of the spoil heap.
- A3.8. Secondly, the survey area was walked, and signs of badger activity recorded in order to determine the classification of each sett present within proximity of the site. Typical badger field signs include:



- Tracks and mammal pathways;
- Push-throughs (gaps where badgers regularly push their way through fencing or hedgerows);
- Latrines and dung pits;
- Badger hairs;
- Badger prints;
- Foraging activity (e.g. snuffle holes); and
- Additional sett entrances.

A3.9. For any setts recorded, these were examined and assigned to one of four categories of importance to the badger clan, as defined by published guidance^{21 22 23 24 25 26}.

Table A3.1. Classification of Badger Setts

Type of Badger Sett	Description
Main Sett	The continuously used, breeding and over-wintering sett for the social group of badgers (clan). Main setts usually more entrances than the rest of clans setts, with large spoil heaps and the setts generally look well used. There are well-used paths to and from the sett and between sett entrances.
Annex Sett	Annex setts are often close to a main sett, usually less than 150m away, and are often connected to the main sett by one or more obvious well-worn paths. Annex setts usually have several holes, but may not be in use all the time, even if the main sett is very active.
Subsidiary Sett	Subsidiary setts often only have a few holes. They are usually at least 50m from a main sett and do not have an obvious path connecting with another sett. They are not continuously active, with seasonal use.
Outlier Sett	Outlier setts usually have only one or two holes, often have little spoil outside the hole, with no obvious path connecting with another sett and are only used sporadically. When not in use by badgers, they are often taken over by foxes or rabbits. However, they can still be recognised as badger setts by the shape of the tunnel (not the actual entrance hole), which is usually at least 250mm in diameter, and is rounded or a flattened oval shape. Fox and rabbit tunnels are smaller and often taller than broad.

Table A3.2. Indicators of Badger Sett use

Classification of Use	Description
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²¹ Harris S., Cresswell, P., Jefferies, D. (1989) *Surveying Badgers*. The Mammal Society, London.

²² Wilson, G., Harris, S., McLaren, G. (1997) *Changes in the British badger population 1988 to 1997*. People's Trust for Endangered Species, London.

²³ Cresswell, P., S. Harris, D. J. Jefferies (1990) *The history, distribution, status and habitat requirements of the badger in Britain*. Nature Conservancy Council, Peterborough, England.

²⁴ Natural England (2022) Badgers: surveys and mitigation for development projects, Natural England standing advice, Available at: <https://www.gov.uk/guidance/badgers-surveys-and-mitigation-for-development-projects> [Accessed: XX/XX/XXXX]

²⁵ Andrews, R. (2013). The Classification of Badger (*Meles meles*) Setts in the UK: A Review and Guidance for Surveyors. Chartered Institute of Ecology and Environmental Management - *In Practice* **82**: 27-31

²⁶ Scottish Badgers (2018). *Surveying for Badgers: Good Practice Guidelines*. Version 1. https://www.scottishbadgers.org.uk/wp-content/uploads/2020/12/Surveying-for-Badgers-Good-Practice-Guidelines_V1-2020-2455979.pdf



Active	Clear of debris and vegetation, obviously in regular use
Partially-active	Not in regular use, with leaves or twigs in entrance or moss and other plants growing around the entrance.
Disused	Partially or completely blocked entrances, unable to be used without a considerable amount of clearance.

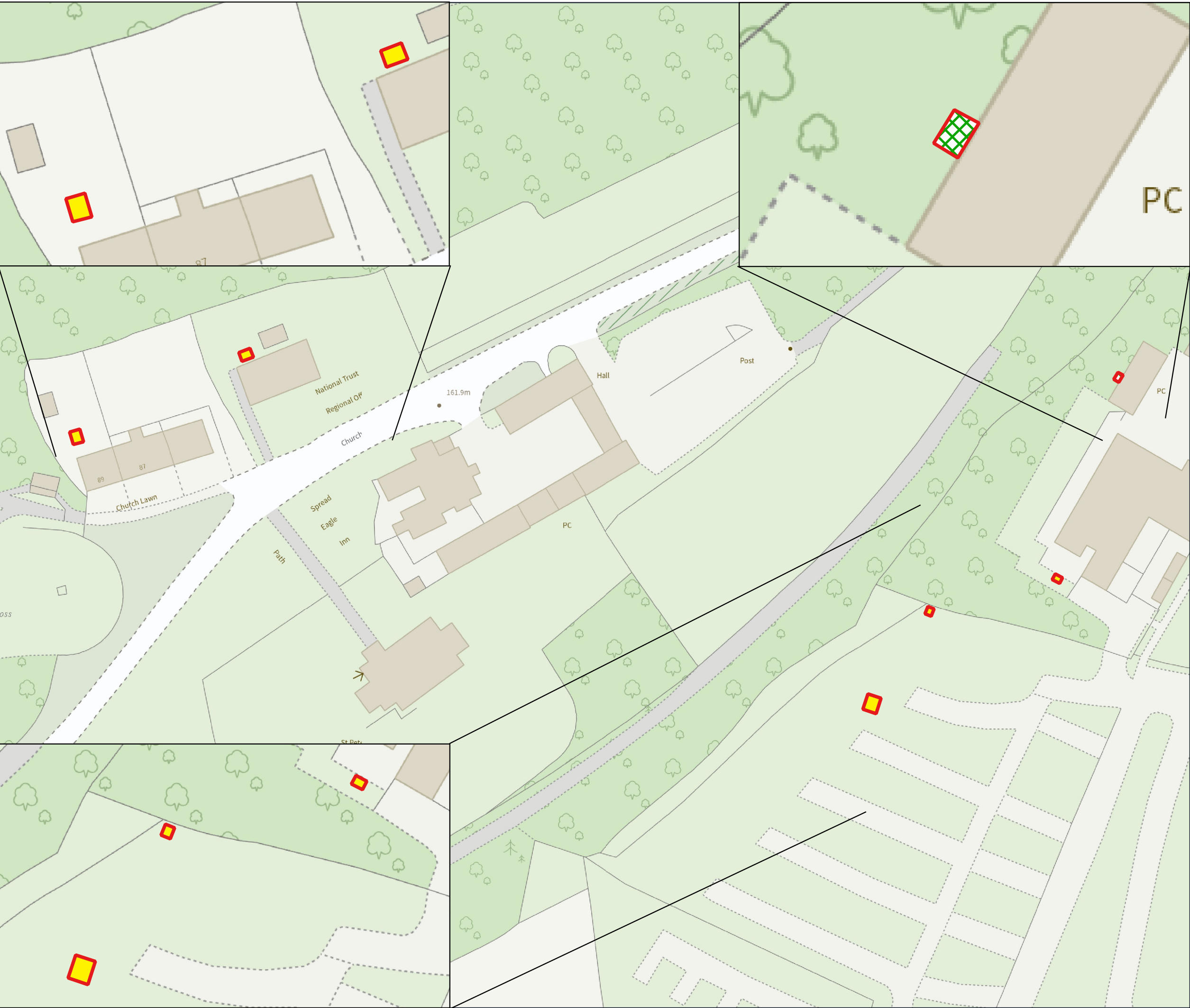
A3.10. The survey area was searched systematically, with particular attention paid to areas where the vegetation and/or the topography offered good suitability for sett creation. Areas with dense ground cover (hedges, scrub, woodland, etc) were examined closely; if the vegetation prevented entry, then the perimeter was examined in order to detect paths suggesting a hidden sett within the area.



Plans:

Plan 1: Habitat Features Plan **18229/P01**





Legend

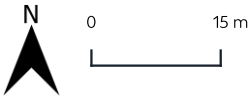
Boundaries

 Redline boundary

Baseline Habitats

 Grassland - Modified grassland

 Heathland and shrub - Mixed scrub



Project	Stour Power - Heat
Drawing Title	Habitat Features
Scale	Scale: 1:877
Drawing No.	18229/P01
Date	November 2025
Checked	JS/LH





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