7.6. The present Conservation Area was first designated in 1973 with a large extension added in November 1983. Within the existing Conservation Area there are 48 listed buildings the location of which are shown on Figure 3 and listed within Appendix 1.

7.7. The town centre exhibits an informal but closely grouped network of streets which appears to be of medieval origin. This is also reflected in street names that hint at considerable antiquity, Cornhill, Paternoster Row, The Flexton, Jesu Street and Yonder Street. A settlement would already have become established when Bishop Grandisson's collegiate church for 40 monks was established in 1335.

7.8. The ecclesiastical centre of Ottery St Mary, focused in proximity to the Grade I Listed Church of St Mary (Fig. 3, **23**), is in contrast to the town centre and is of exceptional quality in terms of historic interest, townscape and spatial arrangement of buildings, further enhanced by some sharp differences in level. There are relatively few jarring features and a quality of timelessness in the contrast between important urban spaces and close proximity to the adjoining countryside. This contrasting juxtaposition has clearly changed little for several centuries. The Parish Church, is understandably a building of national renown, but it is the group that consists also of the Chanter's House, Manor House, Warden's House, Vicarage, Town Hall, and fine 18th century town houses fronting Cornhill and Paternoster Row that endows this part of the town with such unique character.

7.9. From within the Conservation Area, the greater rural landscape to the south, including land within the Site, is not discernible. The key experiences of the Conservation Area, including all of the constituent designated heritage assets, is had from within the its boundaries. This is in the context of the historic streetscape, which affords an opportunity to appreciate the component architecture and thus its evidential, historic, and aesthetic values.

7.10. The proposed development, which is located *c.* 350m to the south, is separated from the Conservation Area's boundaries by a hill upon which a substantial amount of 20th and 21st century development has occurred. From ground level within the Site, views towards the Conservation Area are blocked the local topography of the hill and modern housing along its ridge (Fig. 10). This modern housing is most prominent along the routes of Claremont Field, Winter's Lane and Clapps Lane which overlook the north of the Site.

Figure 10: *Facing north from within the Site, the vista is dominated by modern development and local topography*

7.11. The setting of designated heritage assets within the Ottery St Mary Conservation Area discounted as part of Step 1 comprise a historic settlement, a setting in which they are best perceptible and intelligible as heritage assets. There is no visual relationship between any of the land within the Site or the Conservation Area.

Further Designated Heritage Assets

7.12. The setting of designated heritage assets outside of the Conservation Area boundary largely is one of a landscape dominated by heavily wooded areas, rural fields and undulating topography. Views of the surrounding landscape (including the Site) from these assets are blocked by tall vegetative barriers, local topography and further built form. There are no other discernible (non-visual) historical or landscape associations between any of these assets and the Site.

7.13. St Saviour's Bridge (Fig. 3, **41**), providing the road crossing of the River Otter, was completed in 1851 in a Gothic style and consists of five-arched cast-iron girders supporting cast-iron trays carrying the road surface and railings above (Fig. 11). At *c.* 425m to the north west, the

bridge represents the closest Listed Building to the Site boundary. It was constructed by Joseph Butter and Company of Stanningley Ironworks, Leeds and replaced a previous bridge.

Figure 11: *The Grade II Listed St Saviours Bridge is nestled within substantial vegetation on the eastern edge of Ottery St Mary. View to the north*

7.14. There is no intervisibility between St Saviours bridge and the Site. Whilst looking south from the bridge towards the Site, views are blocked by substantial vegetation along the north west and the west Site boundary (Fig. 12). As such, the proposed development within the Site would not be discernible from the location of the bridge nor would it detract from its experience. As such, the bridge has not been assessed in any further detail.

7.15. A further cluster of designated heritage assets are located within the west of the study area *c.* 625m west of the Site boundary. The closest and most substantial of these is the Grade II Listed Salston built by William Hart Coleridge in the mid-18th century (Fig. 3, **42**; Fig. 13). The building, which is imbued with a degree of associative value due to its affiliation with the famous Coleridge family, represents a large red brick mansion, built to imitate an Elizabethan mansion with gables, finials and projecting porch.

Figure 12: *Views south towards the Site from the Grade II Listed St Saviours Bridge are blocked by substantial vegetative barrier and local topography*

Figure 13: *The Grade II Listed Salston. View to the south east*

7.16. Similar to the other designated heritage assets within the study area, there is no direct visual relationship between the Site and Salston. This is due to substantial, tall vegetation along the western boundary of the Site which prevents any views towards the west of the study area (Fig. 14). The proposed development would not be at all discernible from Salston and the Site does not form a part of the setting of the asset. As such, Salston has not been assessed in any further detail.

Figure 14: *Tall vegetation along the western boundary of the Site. View to the west*

Summary

7.17. The setting of all designated heritage assets discounted as part of Step 1 would not be altered, and would be preserved, as would each asset's key contributing values and views. The proposals would therefore not result in any non-physical harm to the significance of these assets, and they have not been assessed in any further detail.

7.18. All relevant heritage assets assessed as part of Step 1 are included in the gazetteer in Appendix 1 of this report.

8. CONCLUSION

8.1. This assessment has included a review of a comprehensive range of available sources, in accordance with key industry guidance, in order to identify known and potential heritage assets located within the Site and its environs which may be affected by the proposed development. The potential effects of the proposals on the significance of identified heritage assets, including any potential physical effects upon buried archaeological remains, and potential non-physical effects resulting from the anticipated changes to the settings of heritage assets, have been assessed. The effect of the development proposals on the historic environment will be a material consideration in determination of the planning application.

8.2. This assessment has identified no overriding heritage constraints which should preclude development in accordance with the proposed scheme.

Physical effects

8.3. Evidence from the Historic Environment Record suggests that there was widespread activity during the prehistoric period within the study area. Although none of these records are within the Site, they appear to be most prevalent in proximity to the River Otter, the valley of which bounds the Site to the west. A number of undated anomalies from the recent geophysical survey, especially possible ditches and enclosures that are not in alignment with the current field system and appear to pre-date the 1843 Tithe Map, may represent features of prehistoric origin.

8.4. Should such features be present, they would be of evidential and historic (illustrative) value and thus comprise heritage assets. However, it is unlikely that they would be of such significance as to preclude the development of the Site. The development impacts would need to be mitigated through a programme of appropriate and proportionate archaeological works to be agreed with East Devon District Council and DCC HET.

8.5. The resource discussed in this assessment demonstrates that the study area includes a historic agricultural landscape. Whilst likely modified over time, it retains some of the character of a medieval and/or post-medieval strip field system. Further evidence from the recent geophysical survey demonstrates with confidence where these former field boundaries are located within the Site. Cartographic regression has demonstrated that majority of boundaries associated with this strip field system were removed and the ditches backfilled during the latter half of the 20th century. Medieval and later field boundaries as

well as plough marks and other ephemeral remains associated with agriculture would be of relatively limited significance due to the frequency of well-preserved examples throughout the county. Moreover, field boundaries that remained in use into the latter half of the 20th century are of negligible heritage significance.

Non-physical effects

8.6. The proposals are considered to be consistent with the requirements of Paragraph 207 of the NPPF (2024) by describing the significance of any heritage assets affected, including any contribution made by their setting in appropriate detail.

8.7. The character and land-use of the Site has been assessed as playing no meaningful role in the heritage significance of designated heritage assets within Ottery St Mary Conservation Area. Due to substantial modern development adjacent to the north of the Site along the ridge of a hill, there would be no shared visibility between the Conservation Area or land within the Site. Moreover, appreciation of the designated components of Conservation Area are to be had from within the boundaries of the historic settlement. The Site does not form a component of these views. As such, the proposed development would result in **no harm** to the heritage significance of the Conservation Area or the way in which it is experienced.

8.8. No further designated heritage assets were identified which would be susceptible to indirect impacts as a result of residential development of the Site. This includes 48 Listed Buildings within the Ottery St Mary Conservation Area and a further 13 Listed Buildings outside of the Conservation Area. Views of the surrounding landscape (including the Site) from these assets are blocked by local topography, vegetation or modern built form, and there are no other discernible (non-visual) historical or landscape associations between any of these assets and the Site.

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APPENDIX 1: GAZETTEER OF SELECTED RECORDED HERITAGE ASSETS

Non-Designated Heritage Assets (Fig. 2)

MAP_ID	Period	HER No.	Description
1	Palaeolithic	MDV10768	Palaeolithic tools from Friars Gate, Ottery St. Mary
2	Prehistoric	MDV112984	Concentration of Iron Slag and flint scatters
3	Mesolithic	MDV14982	Tranchet from field to south-east of Pixies Parlour, Ottery St. Mary
4	Neolithic	MDV60898	ARTEFACT SCATTER in the Parish of Ottery St. Mary
5	Previous Archaeological Investigation	EDV6921	Evaluation: Former Gerway Nurseries, Ottery St. Mary, East Devon
6	Neolithic	MDV114004	Neolithic Pit at Pixies Parlour, Ottery St. Mary
7	Previous Archaeological Investigation	EDV5439	Archaeological Investigations Along Gas Pipeline, South-West Reinforcement Project
8	Neolithic	MDV119425	Prehistoric Pit at Island Farm, Ottery St Mary
9	Previous Archaeological Investigation	EDV5876	Evaluation on Land at Island Farm, Ottery St Mary
10	Bronze Age	MDV14166	FINDSPOT in the Parish of Ottery St. Mary
11	Bronze Age	MDV114020	Bronze Age Pit at Pixies Parlour, Ottery St. Mary
12	Bronze Age	MDV114024	Early Bronze Age Cremation Pit to south-west of Salston, Ottery St. Mary
13	Bronze Age	MDV102400	Bronze Age Palstave from Island Farm, Ottery St Mary
14	Mesolithic	MDV10426	Worked Flint from Pixies Parlour, Ottery St. Mary
15	Prehistoric	MDV10326	FINDSPOT in the Parish of Ottery St. Mary
16	Prehistoric	MDV69509	FINDSPOT in the Parish of Ottery St. Mary
17	Prehistoric	MDV59679	FINDSPOT in the Parish of Ottery St. Mary
18	Prehistoric	MDV113757	Cropmarks to south of Salston Hotel, Ottery St. Mary
19	Prehistoric	MDV134628	Ring ditch circa 45m east of Otter Holt, Ottery St Mary
20	Iron Age	MDV114002	Iron Age Pit 240 metres south-east of Slade Farm, Ottery St. Mary
21	Romano-British	MDV114022	Roman or Early Medieval Pit at Pixies Parlour
22	Romano-British	MDV127416	Roman box-flue tile, land west of Kings School, Ottery St Mary
23	See Fig. 3		

24	Medieval	MDV19992	Ottery St Mary, Priory
25	Medieval	MDV10343	School, Ottery St. Mary
26	Medieval	MDV19996	Ottery St Mary, College, Canons & Ministers Houses
27	Medieval	MDV83169	WARDEN'S HOUSE
28	Medieval	EDV6971	Archaeological monitoring and recording on land behind, 11 Silver Street, Ottery St Mary, Devon
29	Previous Archaeological Investigation	EDV5282	Archaeological Evaluation on Land off Hind Street, Ottery St Mary
30	Medieval	MDV10344	CHURCH in the Parish of Ottery St. Mary
31	Medieval	MDV10964	CHURCH in the Parish of Ottery St. Mary
32	Medieval	MDV79491	Medieval/Post Medieval Mill Leat, Ottery St. Mary
33	Medieval	MDV119518	Hearth at Island Farm, Ottery St Mary
34	Medieval	MDV130935	Medieval pottery at Ottery St Mary
35	Post-medieval	MDV71631	Copper alloy pins and lace-tags from Hind Street, Ottery St Mary
36	Post-medieval	MDV79512	Tanyard to North of Town Mills, Ottery St. Mary
37	Modern	MDV53961	RAILWAY STATION in the Parish of Ottery St. Mary
38	Medieval	MDV16945	Salston Barton, Ottery St. Mary
39	Undated	MDV113764	Cropmarks to south of Gerway Farm, Ottery St. Mary

Designated Heritage Assets (Fig. 3)

MAP_ID	NHLE No.	Name	HE Grade
23	1212599	CHURCH OF ST MARY	Grade I Listed Building
	1213714	KNIGHTSTONE	Grade I Listed Building
	1212838	THE MANOR HOUSE AND GARDEN WALL TO THE SOUTH OF THE MANOR HOUSE	Grade II Listed Building
	1212843	2, CORNHILL	Grade II Listed Building
	1212844	4, CORNHILL	Grade II Listed Building
	1212845	STAFFORD BOOK SHOP	Grade II Listed Building
	1212961	VICARAGE	Grade II Listed Building
	1213005	3, CORNHILL	Grade II Listed Building
	1213126	THE NOOK	Grade II Listed Building
	1213195	KINGS ARMS	Grade II Listed Building
	1213212	RALEIGH HOUSE	Grade II Listed Building
	1213322	CONGREGATIONAL CHURCH	Grade II Listed Building
	1213365	TOWN MILL AND CIRCULAR WEIR TO NORTH WEST	Grade II Listed Building
	1213367	2, PATERNOSTER ROW	Grade II Listed Building
	1213371	6 AND 8, PATERNOSTER ROW	Grade II Listed Building
	1213374	3, PATERNOSTER ROW	Grade II Listed Building
	1213405	THE FACTORY	Grade II Listed Building
	1213432	ALMA COTTAGE	Grade II Listed Building
	1213444	PATERNOSTER HOUSE	Grade II Listed Building
	1213445	TUDOR HOUSE	Grade II Listed Building
	1213447	SALSTON LODGE	Grade II Listed Building

	1213448	OLD MANOR HOUSE	Grade II Listed Building
	1213450	11, SILVER STREET	Grade II Listed Building
	1213524	GODFREY	Grade II Listed Building
	1213666	17, SILVER STREET	Grade II Listed Building
	1213667	19, SILVER STREET	Grade II Listed Building
	1213668	23, SILVER STREET	Grade II Listed Building
	1213669	WHEEL HOUSE	Grade II Listed Building
	1213670	2, SILVER STREET	Grade II Listed Building
	1213671	BROOK HOUSE	Grade II Listed Building
	1213716	WINKHOUSE FARMHOUSE	Grade II Listed Building
	1213812	ST EDWARD'S CHAPEL	Grade II Listed Building
	1213903	93-99, MILL STREET	Grade II Listed Building
	1213904	BANK COTTAGE	Grade II Listed Building
	1263001	HOLLYBROOK AND ROSE COTTAGE	Grade II Listed Building
	1288846	BELAIR COTTAGE	Grade II Listed Building
	1288857	COTTAGE ON NORTH SIDE OF SANDYGATE LANE, TO SOUTH WEST OF ST EDWARDS'S CHAPEL	Grade II Listed Building
	1289045	LODGE OPPOSITE ENTRANCE TO SALSTON HOTEL	Grade II Listed Building
	1289048	NUMBER 5 AND NUMBER 7 (MANLEY) AND GARDEN WALL	Grade II Listed Building
42	1289052	SALSTON HOTEL	Grade II Listed Building
	1289096	TOWN MILLHOUSE	Grade II Listed Building
	1289097	HOUSE OPPOSITE FACTORY, TO SOUTH EAST	Grade II Listed Building
	1289124	THE DOUNTHORNES	Grade II Listed Building
	1289211	2 AND 3, GOLD STREET	Grade II Listed Building
	1289212	NUMBER 5 (EAST PORTION)	Grade II Listed Building
	1289269	CORNHILL HOUSE	Grade II Listed Building
	1289272	JUBILEE MEMORIAL	Grade II Listed Building
	1289282	WARDEN'S HOUSE	Grade II Listed Building
	1289348	6 AND 11, CORNHILL	Grade II Listed Building
	1365708	VILLAGE STOCKS, TO SOUTH, IN CHURCHYARD	Grade II Listed Building
41	1389504	ST SAVIOURS BRIDGE	Grade II Listed Building
	1212841	THE CHANTER'S HOUSE	Grade II* Listed Building
	1213364	COLBY HOUSE	Grade II* Listed Building
	1213372	The Priory	Grade II* Listed Building
	1213783	FRONT GARDEN WALL OF KNIGHTSTONE	Grade II* Listed Building

APPENDIX 2: HERITAGE STATUTE POLICY AND GUIDANCE

Heritage Statute: Scheduled Monuments

Scheduled Monuments are subject to the provisions of the Ancient Monuments and Archaeological Areas Act 1979. The Act sets out the controls of works affecting Scheduled Monuments and other related matters. Contrary to the requirements of the Planning Act 1990 regarding Listed buildings, the 1979 Act does not include provision for the 'setting' of Scheduled Monuments.

Heritage Statute: Listed Buildings

Listed buildings are buildings of 'special architectural or historic interest' and are subject to the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act'). Under Section 7 of the Act 'no person shall execute or cause to be executed any works for the demolition of a listed building or for its alteration or extension in any manner which would affect its character as a building of special architectural or historic interest, unless the works are authorised.' Such works are authorised under Listed Building Consent. Under Section 66 of the Act 'In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any feature of special architectural or historic interest which it possesses'.

Note on the extent of a Listed Building

Under Section 1(5) of the Act, a structure may be deemed part of a Listed Building if it is:

(a) fixed to the building, or

(b) within the curtilage of the building, which, although not fixed to the building, forms part of the land and has done so since before 1st July 1948

The inclusion of a structure deemed to be within the 'curtilage' of a building thus means that it is subject to the same statutory controls as the principal Listed Building. Inclusion within this duty is not, however, an automatic indicator of 'heritage significance' both as defined within the NPPF (2024) and within Conservation Principals (see Section 2 above). In such cases, the significance of the structure needs to be assessed both in its own right and in the contribution, it makes to the significance and character of the principal Listed Building. The practical effect of the inclusion in the listing of ancillary structures is limited by the requirement that Listed Building Consent is only needed for works to the

'Listed Building' (to include the building in the list and all the ancillary items) where they affect the special character of the Listed building as a whole.

Guidance is provided by Historic England on Listed Buildings and Curtilage: Historic England Advice Note 10 (Historic England 2018).

Heritage assets and heritage significance

Heritage assets comprise 'a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest' (the NPPF (2024), Annex 2). Designated heritage assets include World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Parks and Gardens, Registered Battlefields and Conservation Areas (designated under the relevant legislation; NPPF (2024), Annex 2). The NPPF (2024), Annex 2, states that the significance of a heritage asset may be archaeological, architectural, artistic or historic. Historic England's 'Conservation Principals' looks at significance as a series of 'values' which include 'evidential'. 'historical', 'aesthetic' and 'communal'.

The updated July 2019 revision of the Planning Practice Guidance (PPG) expanded on the definition of non-designated heritage assets. It states that 'Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets.' It goes on to refer to local/neighbourhood plans, conservation area appraisals/reviews, and importantly, the local Historic Environment Record (HER) as examples of where these assets may be identified, but specifically notes that such identification should be made 'based on sound evidence', with this information 'accessible to the public to provide greater clarity and certainly for developers and decision makers'.

This defines non-designated heritage assets as those which have been specially defined as such through the local HER or other source made accessible to the public by the plan-making body. Where HERs or equivalent lists do not specifically refer to an asset as a non-designated heritage asset, it is assumed that it has not met criteria for the plan-making body to define it as such and will be referred to as a heritage asset for the purpose of this report.

Designated heritage assets

Paragraph 202 of the NPPF (2024) explains that heritage assets 'are an irreplaceable resource and should be conserved in a manner appropriate to their significance'. Paragraph 212 notes that 'when considering the impact of a proposed development on the significance of a designated heritage asset,

great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'. Paragraph 214 goes on to note that 'substantial harm to or loss of a grade II listed building…should be exceptional and substantial harm to or loss of designated heritage assets of the highest significance (notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites)…should be wholly exceptional'.

Paragraph 215 clarifies that 'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate, securing its optimum viable use'.

Heritage Statue: Conservation Areas

Conservation Areas are designated by the local planning authority under Section 69(1)(a) of the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act'), which requires that 'Every local planning authority shall from time to time determine which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance'. Section 72 of the Act requires that 'special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area'.

The requirements of the Act only apply to land within a Conservation Area; not to land outside it. This has been clarified in various Appeal Decisions (for example APP/F1610/A/14/2213318 Land south of Cirencester Road, Fairford, Paragraph 65: 'The Section 72 duty only applies to buildings or land in a Conservation Area, and so does not apply in this case as the site lies outside the Conservation Area.').

The NPPF (2024) also clarifies in Paragraph 220 that 'Not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance'. Thus land or buildings may be a part of a Conservation Area, but may not necessarily be of architectural or historical significance. Similarly, not all elements of the setting of a Conservation Area will necessarily contribute to its significance, or to an equal degree.

Effects upon heritage assets

Heritage benefit

The NPPF clarifies that change in the setting of heritage assets may lead to heritage benefit. Paragraph 219 of the NPPF (2024) notes that 'Local planning authorities should look for opportunities for new

development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably'.

GPA3 notes that 'good design may reduce or remove the harm, or provide enhancement' (Paragraph 28). Historic England's 'Conservation Principals' states that 'Change to a significant place is inevitable, if only as a result of the passage of time, but can be neutral or beneficial in its effects on heritage values. It is only harmful if (and to the extent that) significance is reduced' (Paragraph 84).

Specific heritage benefits may be presented through activities such as repair or restoration, as set out in Conservation Principals.

Heritage harm to designated heritage assets

The NPPF (2024) does not define what constitutes 'substantial harm'. The High Court of Justice does provide a definition of this level of harm, as set out by Mr Justice Jay in Bedford Borough Council v SoS for CLG and Nuon UK Ltd. Paragraph 25 clarifies that, with regard to 'substantial harm': 'Plainly in the context of physical harm, this would apply in the case of demolition or destruction, being a case of total loss. It would also apply to a case of serious damage to the structure of the building. In the context of non-physical or indirect harm, the yardstick was effectively the same. One was looking for an impact which would have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced'.

APPENDIX 3: AN ARCHAEOLOGICAL MAGNETOMETER SURVEY: LAND AT GERWAY FARM, OTTERY ST. MARY, DEVON

Substrata

Archaeological Geophysical Surveyors

An archaeological magnetometer survey

Land at Gerway Farm, Ottery St. Mary, Devon Centred on NGR: 309888,94741

Report: 2302OTT-R-1

Mark Edwards
Dr Steven Trick

16th March 2023

Unit 6, Creative Court
Clovelly Road Industrial Estate
Devon
EX39 3HN
Tel: 07504688135
markedwards@substrata.co.uk
Web: substrata.co.uk

Client
AC Archaeology Ltd
4 Halthaies Workshops
Bradninch
Nr Exeter
Devon EX5 4LQ
Tel: 01392 882410

Substrata Limited
Company number: 10348811
Registered office: Units 20 & 21, Bude Business Centre, Kings Hill Industrial Estate, Bude, Cornwall, England EX23 8QN

Contents

Figures

Tables

1 Introduction

This report presents the results of an archaeological magnetometer survey at the proposed development site listed in Section 4.

The survey was commissioned by AC Archaeology Ltd on behalf of Clients in advance of a planning application. The commissioning of this report was in keeping with the National Planning Policy Framework, Chapter 16, Paragraph 194 (Ministry of Housing, Communities & Local Government, 2021). The survey and report were completed in compliance with a Survey Method Statement (Substrata Ltd, 2021).

2 Client

AC Archaeology Ltd, 4 Halthaies Workshops, Bradninch Nr Exeter, Devon, EX5 4LQ

3 Copyright

4 Survey type and location

4.1 Survey

Method:	shallow depth magnetometer survey
Instrument:	twin-sensor fluxgate gradiometer
Survey Date(s):	Feb / Mar 2023
Investigation level:	Level 2 (prospection and delineation)
Survey resolution:	1m by 0.25m
Survey Size:	c.14.7 ha (site),

4.2 Location

Name:	Land at Gerway Farm, Ottery St. Mary
Parish:	Ottery St. Mary
County:	Devon
Nearest Postcode:	EX11 1PT
Survey centre NGR:	SY099947
Survey centre NGR (E/N):	309924,094715 (point)
Historic environment designation:	None
OASIS ID:	substrat1-514491

5 Summary

An archaeological magnetometer survey was carried out on fourteen hectares of land on the southwestern fringe of the town of Ottery St. Mary in East Devon. Twenty-seven anomalies were detected, of which 22 are considered to represent potential buried archaeological deposits. The majority of anomalies detected were curvilinear anomalies, likely to be former field boundaries delineating long narrow fields as depicted on the tithe map of 1845. In Area F, a T-shaped arrangement of linear anomalies may indicate a former field system on a different alignment, possibly predating the tithe map. In Area A, a rectangular anomaly may represent an early enclosure, and similarly in Area B, a squarish anomaly is also tentatively interpreted as an early enclosure. Long curvilinear dipolar anomalies skirting the northern edge of the Survey Area and crossing Area B are likely to be modern services. Spread across the Survey Area are isolated dipolar anomalies which are likely to represent modern ferrous rubbish.

6 Standards

The standards that were used to complete this survey are defined by the Chartered Institute for Archaeologists (2014a) and the European Archaeological Council (Schmidt *et al.* 2016). The codes of approved practice to be followed are those of the Chartered Institute for Archaeologists (2014b) and Archaeology Data Service (Schmidt and Ernenwein, undated).

7 Survey aims and objectives

7.1 Aims

1. Within the framework set out in Chartered Institute for Archaeologists (2014a) and European Archaeological Council (Schmidt *et al.* 2016), complete an archaeological geophysical survey and report which will, as far as possible, establish the presence or absence, extent and character of any buried archaeology within the survey area.
2. Provide sufficient information on the nature of any archaeological remains to facilitate the assessment of their interest prior to the determination of the planning application.

7.2 Objectives

1. Complete a magnetometer survey across the Survey Area.
2. Identify any magnetic anomalies that may be related to buried archaeology.
3. Within the limits of the technique and dataset, archaeologically characterise any such anomalies or patterns of anomalies.
4. Accurately record the location of the identified anomalies.
5. Produce a report based on the survey that is sufficiently detailed to inform any subsequent development on the survey area about the location and possible archaeological character of the recorded anomalies.

8 Methodology

The magnetometer survey was undertaken in accordance a Survey Method Statement (Substrata Ltd, 2021) using the standards specified in Section 6 to achieve the aims and objectives set out in Section 7. The survey method was selected to provide a relatively fast and cost-effective evaluation of any buried archaeology across the Survey Area (see Section 14).

Data processing was undertaken using appropriate software (Table 2), with all anomalies being digitised and geo-referenced. The final report (this document) includes a graphical and textual account of the techniques undertaken, the data obtained and an archaeological interpretation of that data and conclusions about any likely archaeology. The survey and report conform to the Chartered Institute for Archaeologists standard for geophysical survey (Chartered Institute for Archaeologists, 2014a) and European Archaeological Council (Schmidt *et al.* 2016).

9 Survey Area

9.1 Location and description

The land designated for survey, hereafter referred to as the 'Survey Area', consists of a large area of amalgamated fields (Area A), and four further fields (Areas B, C, D, E and F), on the southern fringe of the town of Ottery St. Mary in Devon. To the north and northeast are the residential areas of Otter St. Mary, with the wooded bank of the river Otter to the west, allotments to the east, and open fields to the south. An electrical distribution compound is located 230m to the west, and electrical cabling crosses the Survey Area along four paths supported by pylons. For Areas A, B, C, the terrain slopes gently down east to west, with elevations in the east c.55m amsl, and c. 50m amsl in the west. For Areas D and E, c.65m amsl in the east, down to c. 59m amsl in the west. Area F is c. 57m amsl in the east, and c.55m amsl in the west.

9.2 Geology and sub-surface deposits

The underlying solid geology consists of the Helsby Sandstone Formation - Sandstone. Sedimentary bedrock formed between 247.1 and 241.5 million years ago during the Triassic period (British Geological Survey undated).

In terms of superficial geology, in a strip along the very extreme northern edge of the Survey Area is recorded Head - Sand with clay and gravel. Sedimentary superficial deposit formed between 2.588 million years ago and the present during the Quaternary period.

A magnetometer survey can be recommended over any sedimentary geology. There are few significant distorting factors although a wide range of magnetic susceptibility in the parent rock results in a very variable background response to survey (English Heritage 2008, Table 4).

9.3 Soils

The soils within the Survey Area Freely draining slightly acid loamy soils (www.landis.org.uk, undated).

10 Archaeological background

10.1 Historic landscape characterisation

Post-Medieval: Medieval strip-enclosures: These narrow, curving strip-enclosures derive from the enclosure of open-field strips with hedge-banks during the later middle ages.
Modern: Modern enclosures: These modern fields have been created out of probable medieval enclosures. The sinuous medieval boundaries survive in places.

10.2 Summary of the archaeological background

This section is not designed to provide a comprehensive understanding of the historic environment of the surrounding area and should not be used as a source for further work. There follows a brief description of heritage assets located within the Survey Area itself as mapped by the Devon County Council Environment Viewer (Devon County Council, undated) and any assets in the immediate vicinity thought of relevance.

There are no scheduled monuments within the Survey Area. There is one non-designated polygonal asset covering a wide area including the Survey Area: “Field system on the south side of Ottery St Mary....An extensive former field system is recorded on the 19th century Tithe Map comprising series of long narrow fields. A number of these are still extant.”(MDV114394).

At 80m east of the Survey Area, the DCC mapping locates three non-designated assets on the same spot (SY 10 95) . The identical grid reference is likely due to the generalised grid reference recorded on the older source material, and therefore should be considered approximate. These are listed below:

DCC Ref	Class	Description
MDV60898	ARTEFACT SCATTER	In the Parish of Ottery St. Mary a neolithic flint scatter from Bayre Hill, Ottery St. Mary, is in Exeter City Museum
MDV14166	FINDSPOT	In the Parish of Ottery St. Mary a rough chert axe shaped like a bronze axe was found in Ottery St. Mary. Now in Exeter Museum
MDV130935	POTTERY MANUFAC-TURING SITE?	Medieval pottery at Ottery St Mary

An archaeological evaluation was carried out prior to the construction of the housing immediately east of Survey Area, Area B, at the former Gerway Nurseries (EDV6921), no further information provided.

11 Results

11.1 Scope and definitions

This survey was designed to record magnetic anomalies. A magnetic anomaly is a local

variation in the Earth's magnetic field. Such variations can result from differences in the magnetic properties of the underlying solid geology, superficial geology and other near-surface deposits including those altered and created by past human activities. Near-surface artefacts can also create magnetic anomalies.

The dimensions of magnetic anomalies mapped as representing potential buried archaeology do not represent the dimensions of any associated archaeology.
The analysis presented below identifies and characterises anomalies and anomaly groups that may relate to buried archaeology.

11.2 Analysis

Figure 2 shows the interpretation of the survey data and includes the anomaly groups identified as possibly relating to buried archaeology along with their identifying numbers. Table 1 is an extract of the detailed analysis of the survey data sourced from the attribute tables of the GIS project provided in the project archive.

Figure 2 and Table 1 comprise the analysis of the survey data.

Figure 3 is a plot of the processed data as specified in Table 3. Figure 4 is a plot of minimally processed data as specified in Table 4. Figure 5 shows the location of the survey grid and grid data files.

12 Discussion

12.1 General points

Scope

Not all anomalies or anomaly groups identified in Table 1 are necessarily discussed below. All identified anomaly groups are recorded in the GIS project held in the survey archive.

Data collection

Data collection along the survey area edges was restricted as shown in the figures due to the presence of magnetic materials within and adjacent to the plot boundaries. Strong magnetic responses mapped close to the boundaries are likely to relate to the magnetic materials except where otherwise indicated in Figure 2 and Table 1.

Anomaly characterisation

There are a number of anomaly groups that could be interpreted as relating to large postholes or pits although most will have natural origins. Anomalies of this sort are mapped as potential archaeology when they are well defined in the data, associated with other significant anomaly groups or otherwise formed recognisable patterns as listed in Table 1.

Anomalies thought to relate to natural features and recent man-made objects such as manholes, water management equipment, drains, cables and other services are only mapped where they comprise significant magnetic responses across the dataset that need clarification.

Numerous dipole magnetic anomalies are present within the dataset. These are likely to represent recent ferrous objects. They are only mapped if they could influence the analysis of anomaly groups thought to have an archaeological origin.

Parallel, linear anomalies following the approximately north-south trend of the extant field boundaries (Figures 3 to 4) and not otherwise discussed below are likely to represent relatively recent ploughing disturbance.

12.2 Data relating to historic maps and other records

Anomaly Groups 1, 2, 3, 4, 5, 8, 11, 12, 13 are likely to be field boundaries visible on the Ottery St. Mary tithe map of 1845. The geophysical signature suggests most of these were

hedgebanks with flanking ditches.

12.3 Data with no previous archaeological provenance

Anomaly Group 6 is possibly a ditch of uncertain function and dating.

Anomaly Group 7 is a negative rectilinear anomaly of uncertain interpretation. Note that this anomaly is clearer on the minimally processed plot (Fig. 4).

Anomaly Group 9 is an apparent rectangular enclosure of unknown date. There is possibly an entrance in the middle of the eastern side.

Anomaly Group 10 is a subtle rectilinear anomaly possibly a large enclosure or elements of a former field system. The proximity to Group 9 may suggest a similar date.

Anomaly Group 15 may be an enclosure of uncertain date. Its closeness to (and possible interference from) a former field boundary and a modern service trench makes identification as a discrete feature tentative.

Anomaly Group 14 is possibly a ditch that may have served as a land division role in the past.

Anomaly Groups 16 and 17 are possibly former field boundaries as they align with the field system depicted on the tithe map.

Anomaly Group 18 is possibly a former field boundary as it aligns with the local system and conveniently bisects this field in two.

Anomaly Group 19 coincides with a minor terrace on the LIDAR plot, and is aligned on the modern field boundary, which may suggest this is a modern feature, however an archaeological origin is possible.

Anomaly Groups 20 and 21 are possibly former field boundaries. Their incongruity with the modern and 19th century field system alignment may suggest they pre-date the latter.

Anomaly Group 22 is possibly an irregular cut feature, which is equally plausibly a natural subsoil feature.

Potential modern and services
Anomaly Groups 101, 103, 104 and 105 are dipolar anomalies which are likely to be modern services. Anomaly Group 102 coincides with a modern public right of way and may reflect a dump of metaling material along the route.

13 Conclusions

The geophysical survey was successful in detecting and locating anomalies of possible and likely archaeological origin. Twenty-seven anomaly groups were detected of which 22 are considered to represent potential buried archaeological deposits, with the remainder thought to be modern.

The Devon County Council HER maps this area as being notable for its field system of long narrow fields as depicted on the Ottery St. Mary tithe map of 1845. The present survey confidently detected many of these former field boundaries, although inconsistencies in the spatial data of the tithe map makes this identification difficult at times. In Area F there is evidence for a field system on a different alignment which may predate those of the tithe map. The potential enclosure in the east of Area A, and less defined rectilinear shapes around it may be evidence of early, possibly prehistoric activity on the site. The smaller postulated enclosure in Area B may be of similar antiquity.

14 Disclaimer

The description and discussion of the results presented in this report are the authors', based on their interpretation of the survey data. Every effort has been made to provide accurate descriptions and interpretations of the geophysical data set. The nature of archaeological geophysical surveying is such that interpretations based on geophysical data, while informative, can only be provisional. Geophysical surveys are a cost-effective early step in the multi-phase process that is archaeology.

15 Archive

15.1 Online Access to the Index of archaeological investigationS (OASIS)

OASIS ID: substrat1-514491

The OASIS entry has been completed and the boundary file and report uploaded with six months delay in publication.

15.2 Substrata Limited archive

A full archive of this survey will be held by Substrata Limited on cloud and local hard drive storage as specified in Appendix 3.

15.3 Archaeological Data Service (ADS)

Depending on local authority policy, an archive may be deposited with the ADS as specified in Appendix 3.

15.4 Historic Environment Record (HER)

Subject to any contractual requirements on confidentiality, a PDF or printed copy of the report will be submitted to the appropriate HER within six months of completion.

16 Acknowledgements

Substrata would like to thank John Valentin of AC Archaeology Ltd for commissioning us to complete this survey.

17 Bibliography

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file/1005759/NPPF_July_2021.pdf [Accessed 02/03/23]

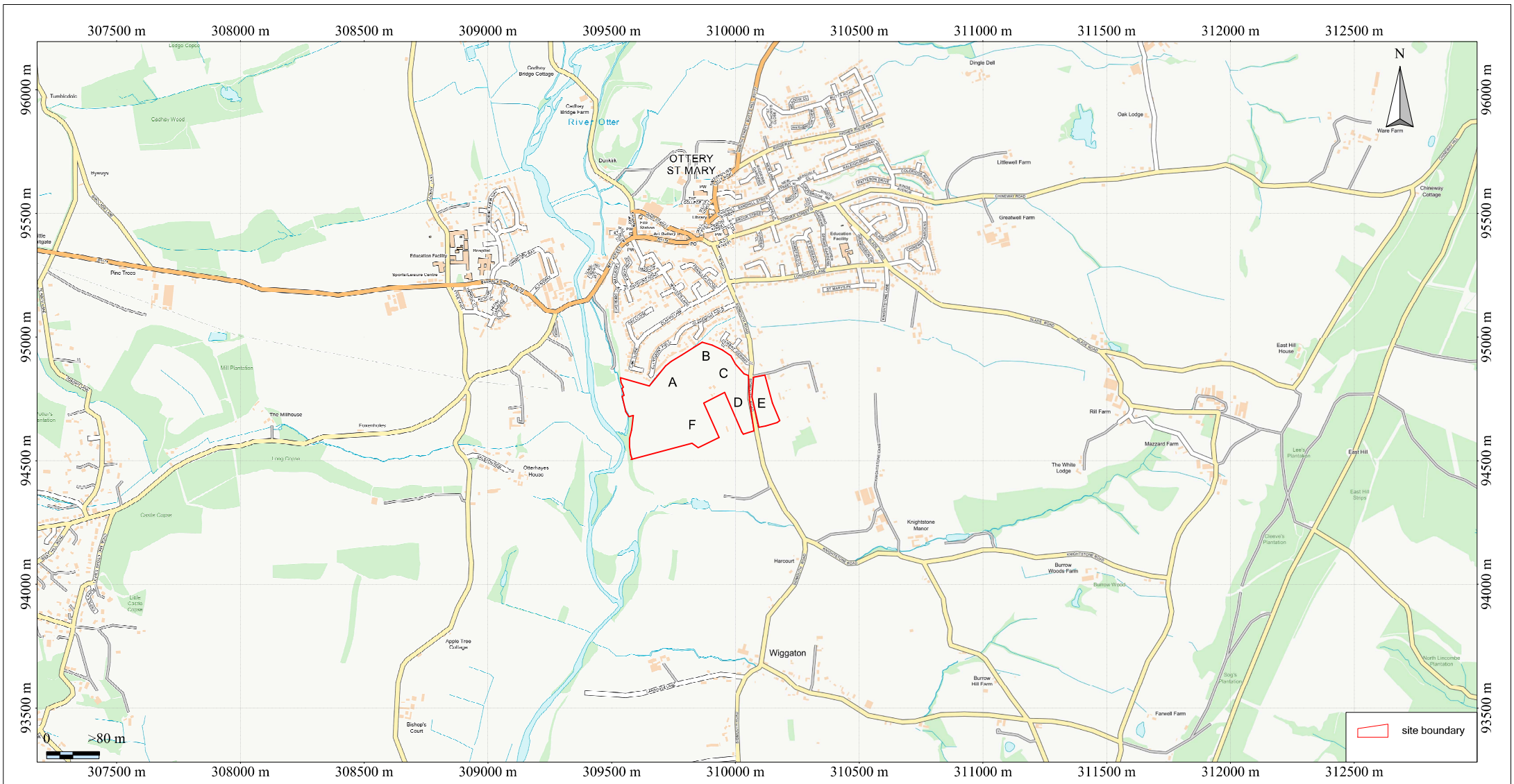
Schmidt, A., Linford, P., Linford, N., David, A., Gaffney, C., Sarris, A. and Fassbinder, J. 2016. *EAC Guidelines for the use of Geophysics in Archaeology: Questions to Ask and Points to Consider*. EAC Guidelines 2. European Archaeological Council. https://f64366e3-8f7d-4b63-9edf-5000e2bef85b.filesusr.com/ugd/881a59_fdb1636e95f64813a65178895aea87cf.pdf. Accessed 23.09.21.

Appendix 1 Figures

General Guidance

The anomalies represented in the survey plots provided in this appendix are magnetic anomalies. The apparent size of such anomalies and anomaly patterns are unlikely to correspond exactly with the dimensions of any associated archaeological features .

A rough rule for interpreting magnetic anomalies is that the width of an anomaly at half its maximum reading is equal to the width of the buried feature, or its depth if this is greater (Clark, 2000: 83). Caution must be applied when using this rule as it depends on the anomalies being clearly identifiable and distinct from adjacent anomalies. In northern latitudes the position of the maximum of a magnetic anomaly will be displaced slightly to the south of any associated physical feature.



British Grid
centre X: 310087.34 m, centre Y: 94737.99 m

Scale: 1:15000 @ A3. Spatial Units: Meter. Do not scale off this drawing

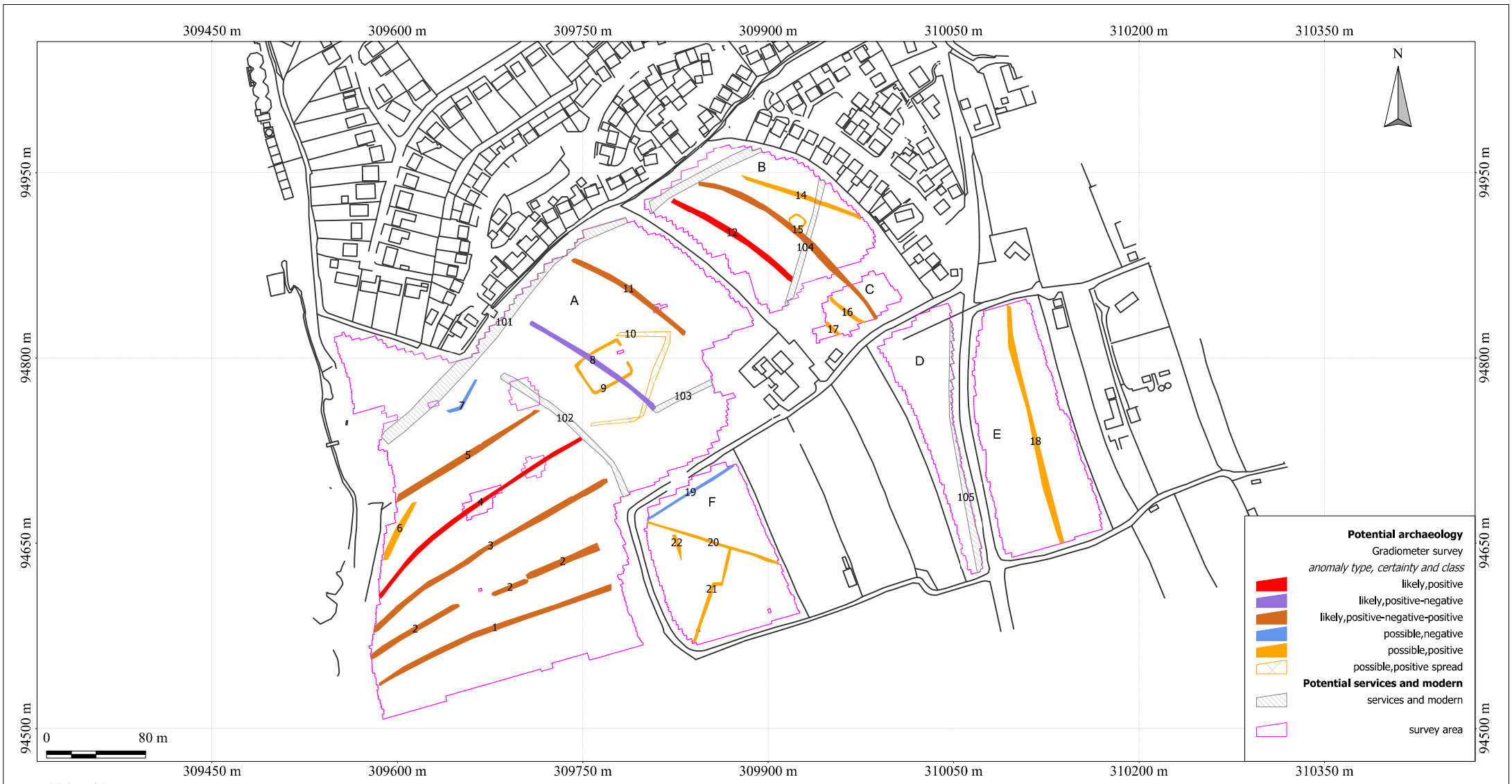
Notes:

1. All interpretations are provisional and represent potential archaeological deposits.
2. 'Anomaly type' is a description of the magnetic anomaly. See the report text or GIS for an archaeological characterisation.
3. Anomalies designated "likely archaeology" have supporting evidence e.g. historical maps and or visible earthworks.
4. Not all instances are mapped.
5. Anomalies likely to represent recent deposits or ground disturbance, or geological and other natural deposits are not mapped unless relevant to potential buried archaeology.

An archaeological magnetometer survey
Land at Gerway Farm, Ottery St Mary
Centred on NGR: 309775 , 094811
Report: 2303GER-R

Figure 1: location plan

Substrata Limited
Unit 6, Clovelly Court Ind Est
Bideford, Devon EX39 3HN
markedwards@substrata.co.uk
Web: substrata.co.uk



British Grid
centre X: 309890.16 m, centre Y: 94764.63 m

Scale: 1:3000 @ A3. Spatial Units: Meter. Do not scale off this drawing

Notes:
1. All interpretations are provisional and represent potential archaeological deposits.
2. 'Anomaly type' is a description of the magnetic anomaly. See the report text or GIS for an archaeological characterisation.
3. Anomalies designated "likely archaeology" have supporting evidence e.g. historical maps and or visible earthworks.
4. Not all instances are mapped.
5. Anomalies likely to represent recent deposits or ground disturbance, or geological and other natural deposits are not mapped unless relevant to potential buried archaeology.

An archaeological magnetometer survey
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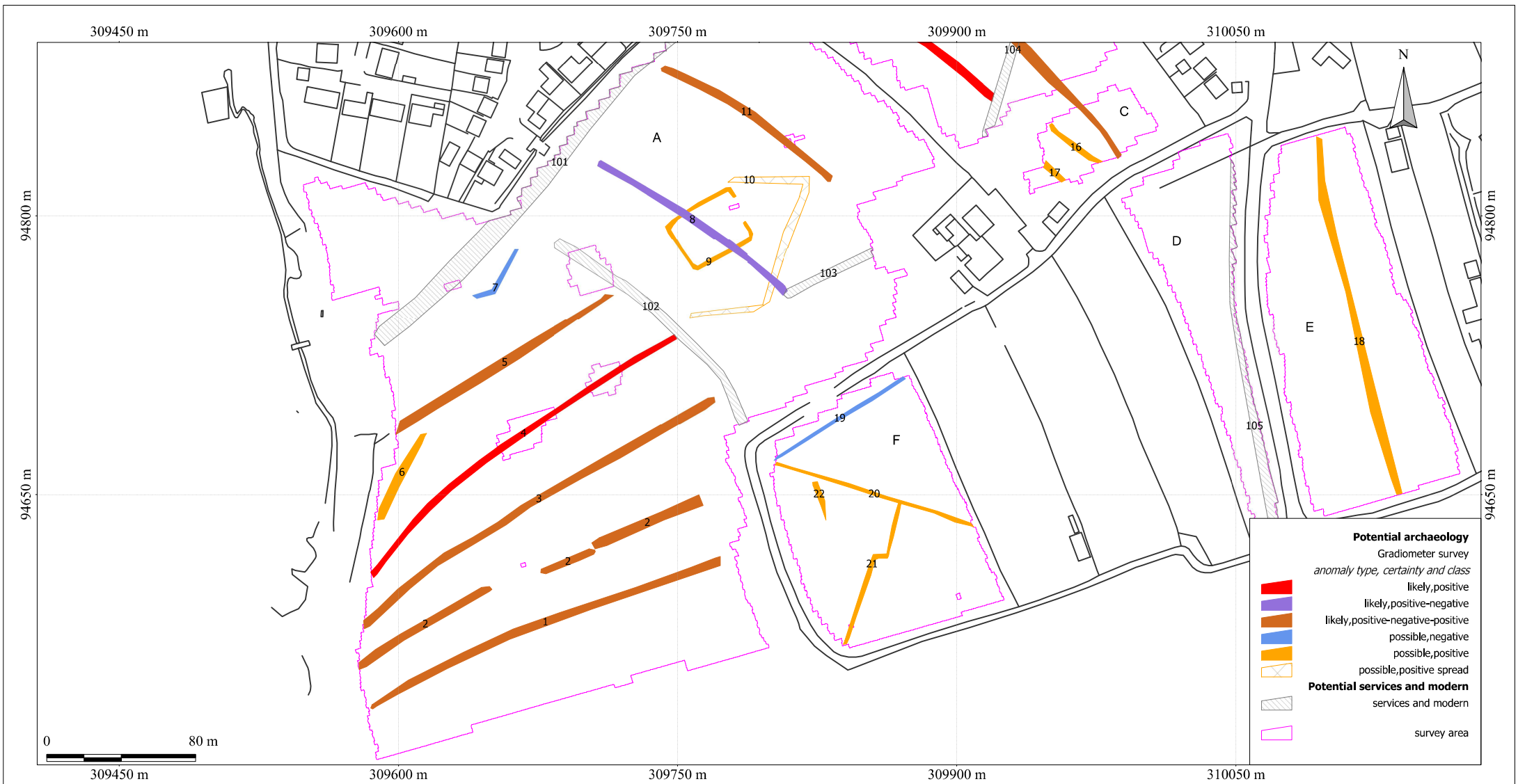
Centred on NGR: 309775 , 094811
Report: 2303GER-R

Figure 2: survey interpretation

Substrata Limited
Unit 6, Clovelly Court Ind Est
Bideford, Devon EX39 3HN
markedwards@substrata.co.uk
Web: substrata.co.uk



British Grid
centre X: 309793.76 m, centre Y: 94698.95 m

Scale: 1:2000 @ A3. Spatial Units: Meter. Do not scale off this drawing

Notes:
1. All interpretations are provisional and represent potential archaeological deposits.
2. 'Anomaly type' is a description of the magnetic anomaly. See the report text or GIS for an archaeological characterisation.
3. Anomalies designated "likely archaeology" have supporting evidence e.g. historical maps and or visible earthworks.
4. Not all instances are mapped.
5. Anomalies likely to represent recent deposits or ground disturbance, or geological and other natural deposits are not mapped unless relevant to potential buried archaeology.

An archaeological magnetometer survey
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Figure 2.1: survey interpretation

Substrata Limited
Unit 6, Clovelly Court Ind Est
Bideford, Devon EX39 3HN
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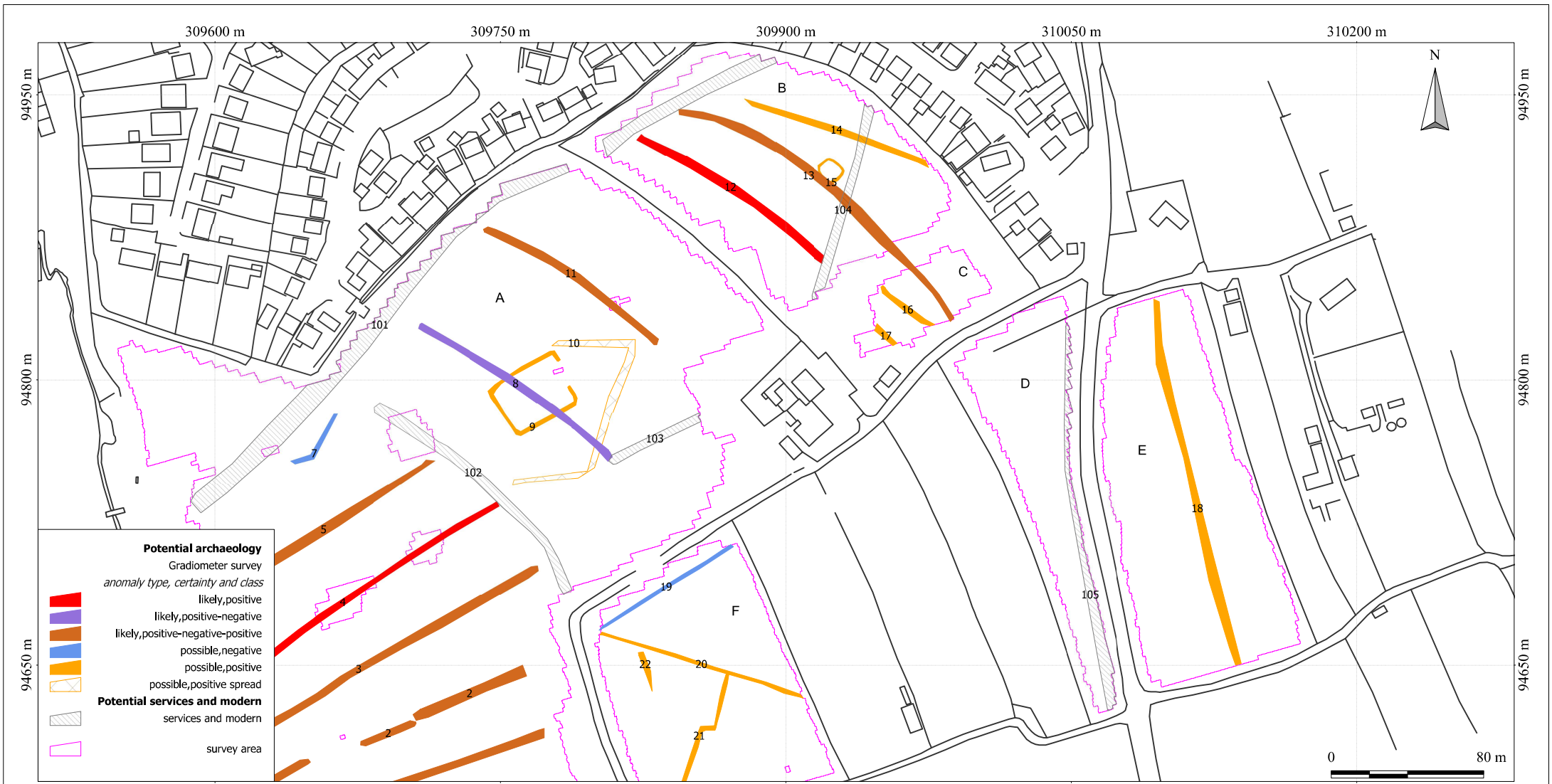
Web: substrata.co.uk



British Grid
centre X: 309894.83 m, centre Y: 94783.09 m

Scale: 1:2000 @ A3. Spatial Units: Meter. Do not scale off this drawing

Notes:
1. All interpretations are provisional and represent potential archaeological deposits.
2. 'Anomaly type' is a description of the magnetic anomaly. See the report text or GIS for an archaeological characterisation.
3. Anomalies designated "likely archaeology" have supporting evidence e.g. historical maps and or visible earthworks.
4. Not all instances are mapped.
5. Anomalies likely to represent recent deposits or ground disturbance, or geological and other natural deposits are not mapped unless relevant to potential buried archaeology.

An archaeological magnetometer survey
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Centred on NGR: 309775 , 094811
Report: 2303GER-R

Figure 2.2: survey interpretation, east

Substrata Limited
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markedwards@substrata.co.uk
Web: substrata.co.uk

British Grid
centre X: 309890.16 m, centre Y: 94764.63 m

Scale: 1:3000 @ A3. Spatial Units: Meter. Do not scale off this drawing

Notes:
1. All interpretations are provisional and represent potential archaeological deposits.
2. 'Anomaly type' is a description of the magnetic anomaly. See the report text or GIS for an archaeological characterisation.
3. Anomalies designated "likely archaeology" have supporting evidence e.g. historical maps and or visible earthworks.
4. Not all instances are mapped.
5. Anomalies likely to represent recent deposits or ground disturbance, or geological and other natural deposits are not mapped unless relevant to potential buried archaeology.

An archaeological magnetometer survey
Land at Gerway Farm, Ottery St Mary
Centred on NGR: 309775 , 094811
Report: 2303GER-R

Figure 3: processed magnetometer data

Substrata Limited
Unit 6, Clovelly Court Ind Est
Bideford, Devon EX39 3HN
markedwards@substrata.co.uk
Web: substrata.co.uk

British Grid
centre X: 309785.47 m, centre Y: 94692.35 m

Scale: 1:2000 @ A3. Spatial Units: Meter. Do not scale off this drawing

Notes:
1. All interpretations are provisional and represent potential archaeological deposits.
2. 'Anomaly type' is a description of the magnetic anomaly. See the report text or GIS for an archaeological characterisation.
3. Anomalies designated "likely archaeology" have supporting evidence e.g. historical maps and or visible earthworks.
4. Not all instances are mapped.
5. Anomalies likely to represent recent deposits or ground disturbance, or geological and other natural deposits are not mapped unless relevant to potential buried archaeology.

An archaeological magnetometer survey
Land at Gerway Farm, Ottery St Mary
Centred on NGR: 309775 , 094811
Report: 2303GER-R

Figure 3.1: processed magnetometer data, west

Substrata Limited
Unit 6, Clovelly Court Ind Est
Bideford, Devon EX39 3HN
markedwards@substrata.co.uk
Web: substrata.co.uk

British Grid
centre X: 309889.72 m, centre Y: 94786.01 m

Scale: 1:2000 @ A3. Spatial Units: Meter. Do not scale off this drawing

Notes:
1. All interpretations are provisional and represent potential archaeological deposits.
2. 'Anomaly type' is a description of the magnetic anomaly. See the report text or GIS for an archaeological characterisation.
3. Anomalies designated "likely archaeology" have supporting evidence e.g. historical maps and or visible earthworks.
4. Not all instances are mapped.
5. Anomalies likely to represent recent deposits or ground disturbance, or geological and other natural deposits are not mapped unless relevant to potential buried archaeology.

An archaeological magnetometer survey
Land at Gerway Farm, Ottery St Mary
Centred on NGR: 309775 , 094811
Report: 2303GER-R

Figure 3.2: processed magnetometer data, east

Substrata Limited
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Web: substrata.co.uk

British Grid
centre X: 309890.16 m, centre Y: 94764.63 m

Scale: 1:3000 @ A3. Spatial Units: Meter. Do not scale off this drawing

Notes:
1. All interpretations are provisional and represent potential archaeological deposits.
2. 'Anomaly type' is a description of the magnetic anomaly. See the report text or GIS for an archaeological characterisation.
3. Anomalies designated "likely archaeology" have supporting evidence e.g. historical maps and or visible earthworks.
4. Not all instances are mapped.
5. Anomalies likely to represent recent deposits or ground disturbance, or geological and other natural deposits are not mapped unless relevant to potential buried archaeology.

An archaeological magnetometer survey
Land at Gerway Farm, Ottery St Mary
Centred on NGR: 309775 , 094811
Report: 2303GER-R

Figure 4: unprocessed magnetometer data

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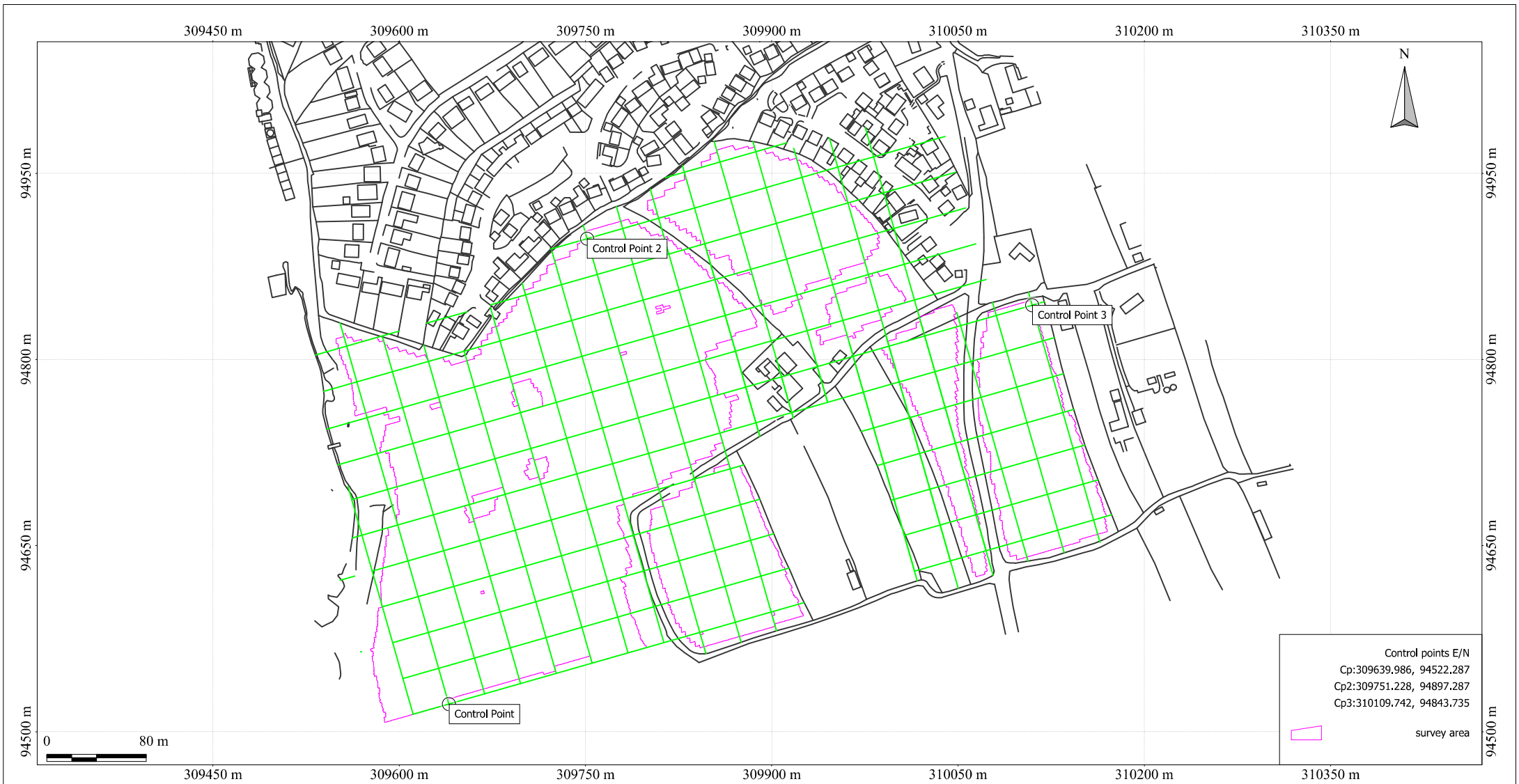

British Grid
centre X: 309890.16 m, centre Y: 94764.63 m

Scale: 1:3000 @ A3. Spatial Units: Meter. Do not scale off this drawing

Notes:
1. All interpretations are provisional and represent potential archaeological deposits.
2. 'Anomaly type' is a description of the magnetic anomaly. See the report text or GIS for an archaeological characterisation.
3. Anomalies designated "likely archaeology" have supporting evidence e.g. historical maps and or visible earthworks.
4. Not all instances are mapped.
5. Anomalies likely to represent recent deposits or ground disturbance, or geological and other natural deposits are not mapped unless relevant to potential buried archaeology.

An archaeological magnetometer survey
Land at Gerway Farm, Ottery St Mary
Centred on NGR: 309775 , 094811
Report: 2303GER-R

Figure 5: grid plan and control points

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Bideford, Devon EX39 3HN
markedwards@substrata.co.uk
Web: substrata.co.uk

Appendix 2 Tables

Site: Land at Gerway Farm, Ottery St Mary
Centred on NGR: 309775 , 094811

plot	anomaly group	associated anomaly group	anomaly characterisation certainty & class	anomaly form	additional archaeological characterisation	comments	supporting evidence
A	1		likely,positive-negative-positive	curvilinear	former field boundary?	visible on tithe map. slighter at west end?	Ottery St Mary tithe map 1845
A	2		likely,positive-negative-positive	curvilinear	former field boundary?	visible on tithe map. uncertain why there are gaps.	Ottery St Mary tithe map 1845
A	2		likely,positive-negative-positive	curvilinear	former field boundary?	visible on tithe map. uncertain why there are gaps.	Ottery St Mary tithe map 1845
A	2		likely,positive-negative-positive	curvilinear	former field boundary?	visible on tithe map. uncertain why there are gaps.	Ottery St Mary tithe map 1845
A	3		likely,positive-negative-positive	curvilinear	former field boundary?	visible on tithe map.	Ottery St Mary tithe map 1845
A	4		likely,positive	curvilinear	former field boundary?	visible on tithe map	Ottery St Mary tithe map 1845
A	5		likely,positive-negative-positive	linear	former field boundary?	visible on tithe map	Ottery St Mary tithe map 1845
A	6		possible,positive	curvilinear	uncertain.ditch?		
A	7		possible,negative	rectilinear	uncertain	clearer on unprocessed data	
A	8		likely,positive-negative	curvilinear	former field boundary?	visible on tithe map	Ottery St Mary tithe map 1845
A	9		possible,positive	rectilinear	enclosure?	late prehistoric/early historic?	
A	10	9?	possible,positive spread	rectilinear	uncertain.enclosures?		
A	11		likely,positive-negative-positive	curvilinear	former field boundary?	visible on tithe map	Ottery St Mary tithe map 1845
B	12		likely,positive	curvilinear	former field boundary?	visible on tithe map	Ottery St Mary tithe map 1845
B	13		likely,positive-negative-positive	curvilinear	former field boundary?	visible on tithe map	Ottery St Mary tithe map 1845
B	14		possible,positive	linear	uncertain.ditch?	different pattern to field system?	
B	15		possible,positive	rounded square	enclosure?	possibly disturbed by hedgebank and service	
C	16		possible,positive	curvilinear	uncertain.ditch?		
V	17		possible,positive	linear	uncertain.ditch?	part of field system to north?	
E	18		possible,positive	curvilinear	former field boundary?		
F	19		possible,negative	linear	uncertain.bank?	coincides with minor terrace on LIDAR. Modern?	
F	20	21	possible,positive	linear	former field boundary?	at odds to 19th century field system. earlier?	
F	21	20	possible,positive	rectilinear	former field boundary?	at odds to 19th century field system.earlier?	
F	22		possible,positive	irregular	uncertain. pit?		
A	101		likely,dipolar	curvilinear	modern service		
A	102		possible,dipolar	curvilinear	modern surface of footpath?	corresponds to former road	Tithe map
A	103		likely,dipolar	linear	modern service/drain		
B	104		likely,dipolar	curvilinear	modern service		
D	105		likely,dipolar	curvilinear	modern service		

Table 1: data analysis

<table>
<tr><td colspan="2">Grid
Method of Fixing: DGPS set-out using pre-planned survey grids and Ordnance Survey coordinates.
Composition: 30m by 30m grids
Recording: Geo-referenced and recorded using digital map tiles.
DGPS used: Spectra Precision PM5V2 GPS with external antenna and survey pole and DigiTerra Explorer 7 as the survey control program.</td></tr>
<tr><td>Equipment
Instrument: Bartington Instruments grad601-2
Firmware: version 6.1</td><td>Data Capture
Sample Interval: 0.25m
Traverse Interval: 1 metre
Traverse Method: zigzag
Traverse Orientation: GN</td></tr>
<tr><td colspan="2">Data Processing, Analysis and Presentation Software
IntelliCAD 8.4
DW Consulting TerraSurveyor3
Manifold System 8 GIS
Microsoft Corp. Office 365: Excel, Publisher, Word
Adobe Systems Inc Adobe Acrobat 9 Pro Extended</td></tr>
</table>

Table 2: methodology information

Description:
Instrument Type: Grad 601 (Magnetometer)
Units: nT
Direction of 1st Traverse: 0 deg
Collection Method: ZigZag
Sensors: 2 @ 1.00 m spacing.
Dummy Value: 32702

Dimensions
Composite Size (readings): 1080 x 390
Survey Size (meters): 270 m x 390 m
Grid Size: 30 m x 30 m
X Interval: 0.25 m
Y Interval: 1 m

Stats
Max: 13.15
Min: -14.74
Std Dev: 4.03
Mean: 0.08
Median: 0.00

Processes: 4
1 Base Layer
2 Clip at 1.00 SD
3 De Stagger: Grids: All Mode: Both By: -2 intervals
4 DeStripe Median Sensors: All

Note: Input to the GIS results in slight changes to the stats shown above. The data stored in the archives (Appendix 3) will have the above metadata and the values quoted in the report figures will be those quoted in this metadata table.

Table 3: processed data metadata

Description:
Instrument Type: Grad 601 (Magnetometer)
Units: nT
Direction of 1st Traverse: 0 deg
Collection Method: ZigZag
Sensors: 2 @ 1.00 m spacing.
Dummy Value: 32702

Dimensions
Composite Size (readings): 1080 x 390
Survey Size (meters): 270 m x 390 m
Grid Size: 30 m x 30 m
X Interval: 0.25 m
Y Interval: 1 m

Stats
Max: 98.79
Min: -100.00
Std Dev: 7.44
Mean: 6.15
Median: 6.05

Processes: 1
1 Base Layer

Note: Input to the GIS results in slight changes to the stats shown above. The data stored in the archives (Appendix 3) will have the above metadata and the values quoted in the report figures will be those quoted in this metadata table.

Table 4: Unprocessed raw data metadata

Appendix 3 Project archive contents

A3.1 Substrata Limited archive

A full archive of this survey will be held by Substrata Limited on cloud and local hard drive storage as follows:

Report:	Adobe PDF (.pdf), Microsoft Publisher (.pub)
Raw grid data files:	DW Consulting TerraSurveyor 3 (.xgd) and
Raw data composite files:	CSV (.xyz)
Minimally processed data composite files:	DW Consulting TerraSurveyor 3 (.xgd) and CSV (.xyz)
Final data processing composite files:	DW Consulting TerraSurveyor 3 (.xgd) and CSV (.xyz)
GIS project:	GIS project Manifold 8 (.map)
Survey interpretation:	ESRI shape files
AutoCAD version of the survey interpretation: (if generated)	AutoCAD (.dwg)
All project working files:	IntelliCAD 8.4 Microsoft Corp. Office 365: Excel, Publisher, Word Adobe Systems Inc Adobe Acrobat 9 Pro Extended

A3.2 Online Access to the Index of archaeological investigationS (OASIS)

Metadata:	online form
Georeferenced survey boundary file:	ESRI shape file
Report:	Adobe PDF (.pdf)

A3.3 Archaeological Data Service

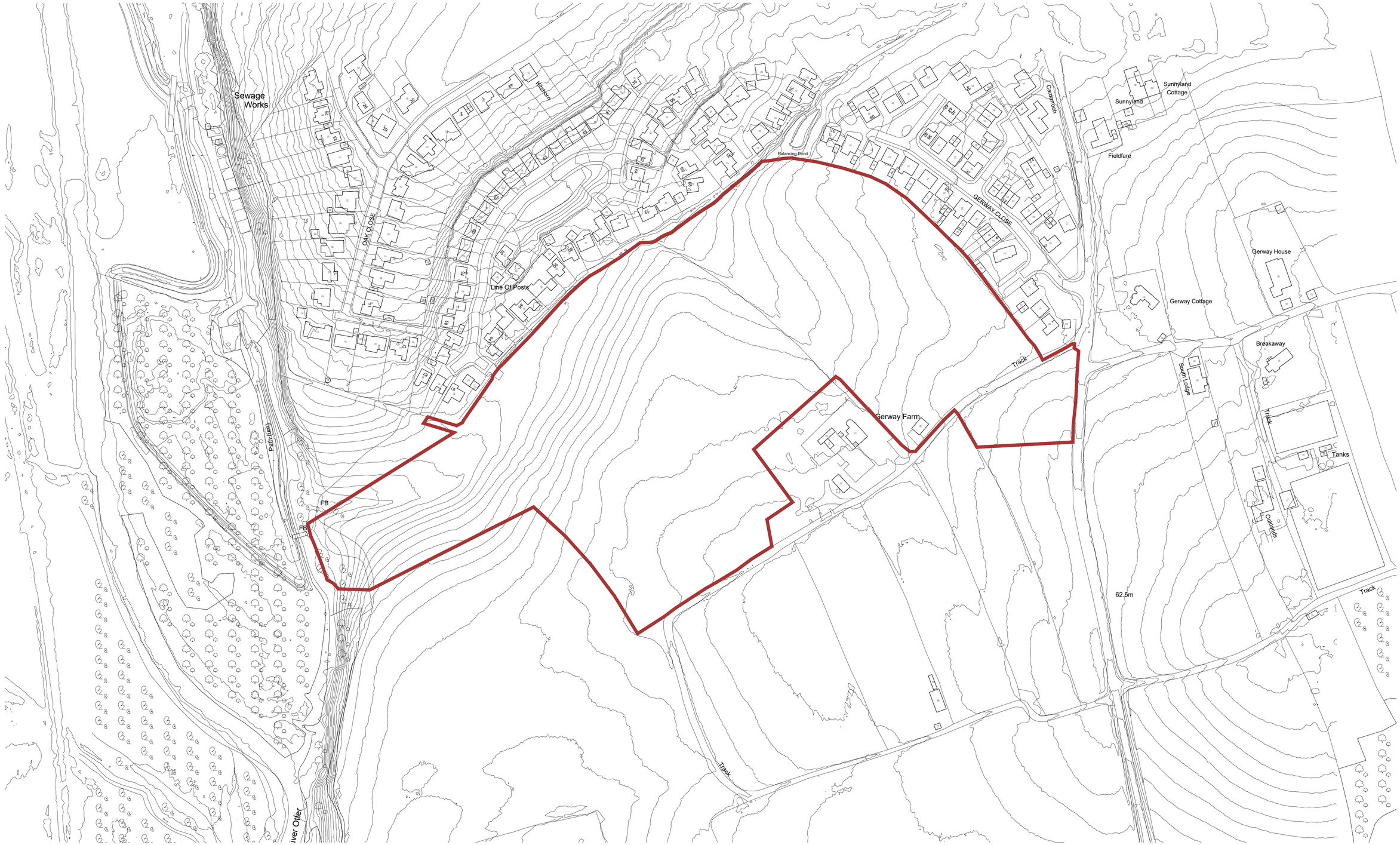
Depending on local authority policy, an archive may be deposited with the ADS as follows:

Raw data composite file:	CSV (xyz)
Processed data plot:	rendered images in TIFF format
Survey grid plot:	image in TIFF format
Details of data processing:	image in TIFF format
Interpretation plot:	rendered images in TIFF format
Metadata:	Microsoft Excel format

A3.4 Historic Environment Record (HER)

Subject to any contractual requirements on confidentiality, a PDF copy of the report will be submitted to the appropriate HER within 6 months of the completion of this report via the OASIS process or by other means, depending on the relevant HER process.

APPENDIX 4: CURRENT SITE LAYOUT



therichardspartnership 1 Agincourt Square, Monmouth, NP25 3BT T: +44(0)1600 772251	**Project:** Land at Gerway Farm, Ottery St. Mary	**Title:** Site Location Plan	**Revisions:** Rev 0: Drawing Created 11/09/2025	**Drawn by:** JG	**Checked by:** PJR	**Status:** Planning	**Date:** 11/09/2025	**Drawing no:** 24-54-PL-202	**Rev:** 0

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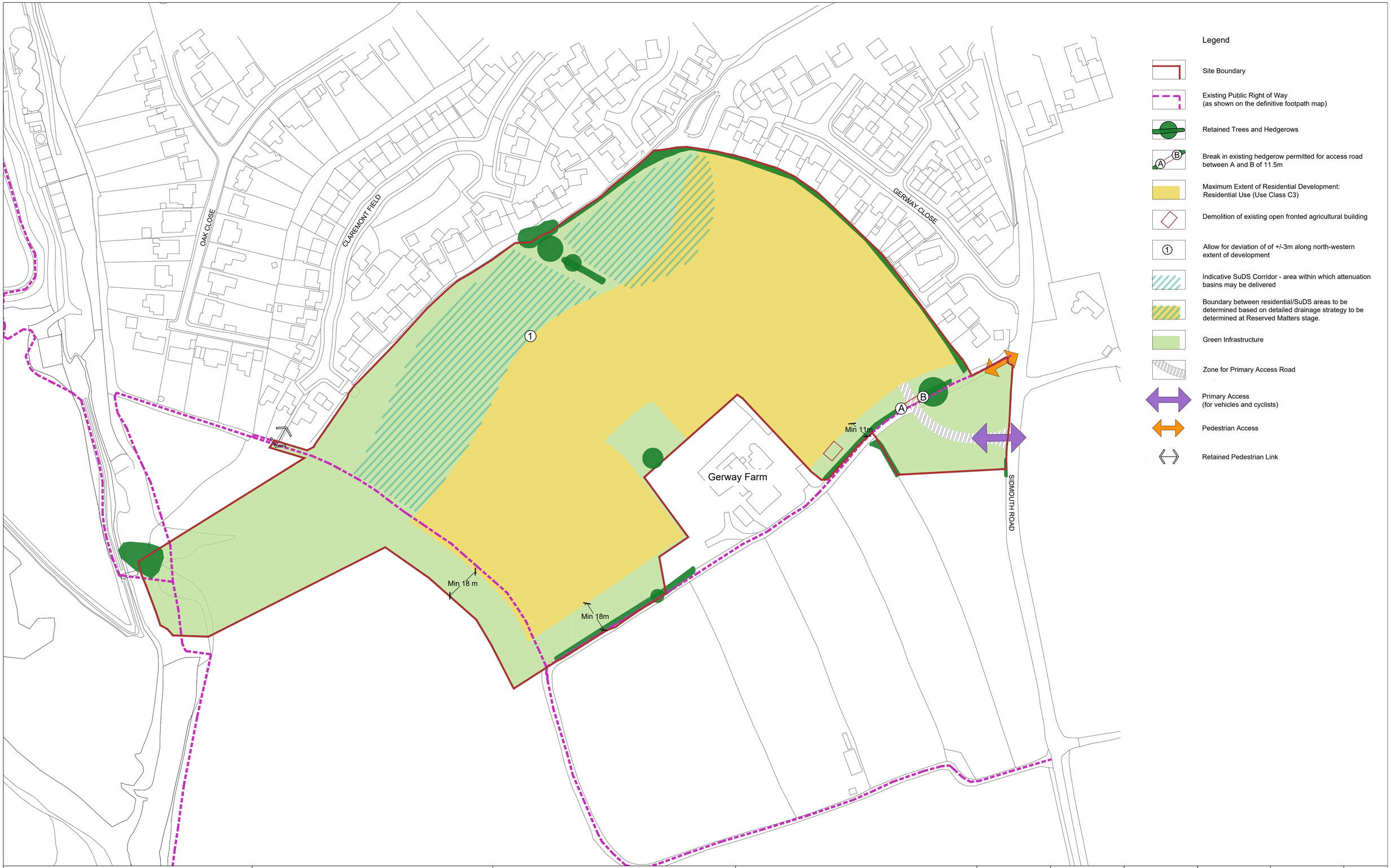

therichardspartnership
1 Agincourt Square, Monmouth, NP25 3BT
T: +44(0)1600 772251

Project:
Land at Gerway Farm, Ottery St. Mary

Title:
Land Use Parameter Plan

Revisions:
Rev B: Layout amended 19/11/2025
Rev A: Annotation amended 22/10/2025
Rev 0: Drawing created 11/09/2025

Drawn by:	Checked by:	Status:	Date:	Drawing no:	Rev:
JG	PJR	Planning	11/09/2025	24-54-PL-204	B

Scale: 1:1000 @ A1

0 50 100

Legend

- Site Boundary
- Existing Public Right of Way (as shown on the definitive footpath map)
- Retained Trees and Hedgerows
- Break in existing hedgerow permitted for access road between A and B of 11.5m
- New hedgerow provided along frontage (in part replacement of removed c.20m section of existing hedgerow)
- Green Infrastructure
  Anticipated to include (but not limited to):
  - Cycleways
  - Footopaths
  - Lighting
  - Subterranean services infrastructure
  - SuDS
  - Play Equipment
- Proposed Mixed Native Field Boundary Hedgerows
- Planting Buffer - Informal large and medium stature tree planting in species rich grassland with informal mixed native hedgerow along boundary
- Bat Sensitive Corridor
- Indicative SuDS Corridor - area within which attenuation basins maybe delivered
- Indicative Area for Play
- Boundary between residential/SuDS areas to be determined based on detailed drainage strategy to be determined at Reserved Matters stage.
- Zone for Primary Access Road
- Primary Access (for vehicles and cyclists)
- Pedestrian Access
- Retained Pedestrian Link
- Indicative Agricultural Access (to align with internal road where relevant). Up to 4.5m break in hedgerow and associated planting

therichardspartnership
1 Agincourt Square, Monmouth, NP25 3BT
T: +44(0)1600 772251

Project: Land at Gerway Farm, Ottery St. Mary

Title: Green and Blue Infrastructure Parameter Plan

Revisions:
Rev B: Layout amended 19/11/2025
Rev A: Annotation amended 22/10/2025
Rev 0: Drawing created 11/09/2025

Drawn by:	Checked by:	Status:	Date:	Drawing no:	Rev:
JG	PJR	Planning	11/09/2025	24-54-PL-205	B

Scale: 1:1000 @ A1

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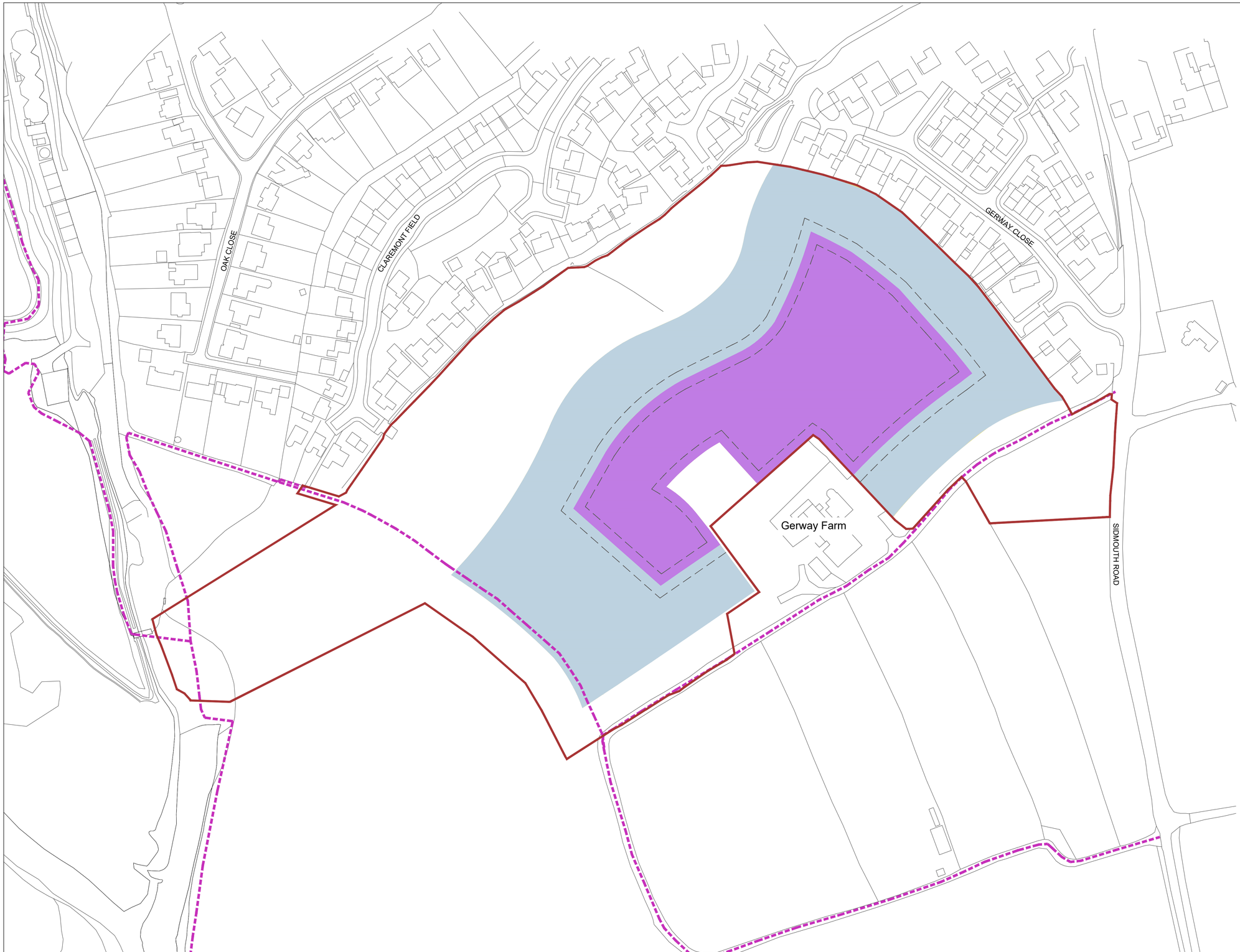

Legend

- Site Boundary
- Existing Public Right of Way (as shown on the definitive footpath map)
- Up to 2 Storey (Maximum height of 9.0m from FFL to ridge)
- Up to 2.5 Storey (Maximum height of 10.5m from FFL to ridge)
- +/- 5m deviation to provide flexibility in location of roads and adjoining housing cells

Notes

- Building heights may deviate vertically by +/-1m from existing levels within a house footprint to allow for ground modeling.
- Maximum heights exclude chimneys, flues etc.

therichardspartnership
1 Agincourt Square, Monmouth, NP25 3BT
T: +44(0)1600 772251

Project: Land at Gerway Farm, Ottery St. Mary

Title: Building Heights Parameter Plan

Revisions:

Rev B: Layout amended 19/11/2025
Rev A: Annotation amended 22/10/2025
Rev 0: Drawing created 11/09/2025

Drawn by:	Checked by:	Status:	Date:	Drawing no:	Rev:
JG	PJR	Planning	11/09/2025	24-54-PL-206	B

Scale: 1:1000 @ A1

0 50 100

Appendix 6 Ecological Assessment

Bennu Environmental Limited

LANDRA Developments Ltd

LAND AT GERWAY FARM
OTTERY ST MARY
EAST DEVON

ECOLOGICAL ASSESSMENT

November 2025
BEL-0013-EcoAss-v5

CONFIDENTIAL INFORMATION

This report contains sensitive ecological information
relating to the presence and/or potential presence of protected species.
This report, or any sections referring to sensitive species,
should not be shared in the public domain
without prior agreement and appropriate redaction.

CONTENTS

PLANS

APPENDICES

1. INTRODUCTION

Background and Proposals

1.1 Bennu Environmental Limited was commissioned by Landra Developments Ltd in February 2025, to produce an ecological appraisal in respect of land at Gerway Farm, Ottery St. Mary, East Devon (the "Site"). Further to this Bennu Environmental Limited were instructed to produce an Ecological Assessment to support an outline planning application for proposed development at the Site.

Site Characteristics

1.2 The Site predominantly comprises of several fields of improved grassland. Additional habitats include rank grassland, a small area of ruderal vegetation, bare ground, a woodland edge, and developed land consisting small livestock shelter and area of hardstanding leading up to the Site.

1.3 Woodland habitat borders the Site to the west (with the River Otter beyond). Residential housing borders the Site to the north, with Sidmouth Road running along the eastern boundary. Open fields, hedgerows, and trees are located beyond the southern boundary.

Ecological Assessment

1.4 The report also sets out the existing baseline conditions for the Site and its immediate surrounds, setting these in the correct planning policy and legal framework and assessing any potential ecological effect and impacts which may occur as a result of the proposals. Where necessary, appropriate and proportionate mitigation is identified. Any ecological enhancements that are to be delivered as part of the proposal are described.

1.5 This assessment has been prepared with regard to relevant guidance, such as that published by the Chartered Institute of Ecology and Environmental Management (CIEEM) including Guidelines for Ecological Impact Assessment (CIEEM, 2024) and Guidelines for Ecological Report Writing (CIEEM, 2017).

2. METHODOLOGY

2.1 The methodology utilised for this appraisal can be split into two areas, namely a desk survey and a field survey. These are discussed in more detail below.

Desk Study

2.2 To gather existing ecological data for the Site and its immediate surroundings, records were sought from Devon Biodiversity Records Centre (DBRC).

2.3 In addition, pre-existing survey information has been used to inform this assessment wherever appropriate.

2.4 Information on statutory designated sites within the wider area was sourced from the online Multi-Agency Geographic Information for the Countryside (MAGIC) database. Relevant findings are presented in Appendix 1 and illustrated where appropriate on Plan ECO1.

Field Survey

2.5 A field survey of the Site was undertaken on 14 May 2025 by an experienced ecologist to assess both the habitats present and the potential for use by notable or protected faunal species.

2.6 The survey involved mapping and classifying the Site's habitats with regard to the Extended Phase 1 Habitat Survey methodology (JNCC, 2010), as recommended by Natural England. This involved identifying and recording the habitat types present, mapping their extent, and compiling representative species lists for each.

2.7 In parallel, the Site was assessed with regard to UK Habitat Classification system (UKHab Ltd., 2023) to provide additional context on the habitats present and to further inform and support any future biodiversity impact assessments.

Species Survey

2.8 During the course of the habitat survey, incidental observations of fauna were recorded, including sightings and calls of birds and mammals. Special attention was given to the presence or potential presence of protected species, Priority Species, and other fauna of conservation interest.

2.9 The survey also included an appraisal of the Site's suitability for supporting key protected species. Field signs, habitat features and environmental conditions were assessed in relation to:

i. Badger *Meles meles*;

ii. Bats;

iii. Hazel Dormouse *Muscardinus avellanarius*; and

iv. Reptiles.

2.10 Further to the above suitability appraisals, further species-specific surveys were undertaken. The methodologies of these surveys are presented below for each species / species group.

Badgers

2.11 Specific surveys for Badgers were carried out in May 2025.

2.12 The surveys comprised two main elements. Firstly, searching thoroughly for evidence of Badger setts. If any setts were found, standard survey practice would involve recording the location of each sett entrance, even if the entrance appeared disused. The following information was recorded if appropriate:

I. The number and location of well used or very active entrances; these are clear of any debris or vegetation and are obviously in regular use and may, or may not, have been excavated recently.

II. The number and location of inactive 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.

III. 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.

2.13 Secondly, any evidence of Badger activity such as well-worn paths, run-throughs, snagged hair, footprints, latrines and foraging signs were recorded so as to build up a picture of the use of the site, if any, by Badgers.

Hazel dormouse

2.14 Surveys for Hazel Dormice have been undertaken across all suitable hedgerows and woodland within the Site.

2.15 The survey technique involves the erection of nest tubes within hedgerows and woodland in the Site. Features of importance to Dormice include diverse well-structured hedgerows offering a range of food sources throughout the year. Good arboreal links through the canopy layer of hedgerows / woodlands are required along with suitably dense cover for nest sites and good hibernation sites. Typical indicator tree / plant species include Hazel *Corylus avellana,* Honeysuckle *Lonicera periclymenum* and Bramble *Rubus fruticosus* agg.).

2.16 50 Nest tubes were placed in accordance with the guidance provided by the Mammal Society and Natural England on 21 May 2025. Typically, tubes are placed within hedgerows approximately every 20 metres where suitable locations can be identified. The nest tubes were attached with wire ties underneath suitably sturdy horizontal branches and positioned on average at approximately 1.5 metres above ground level.

2.17 The survey methodology applies a scoring system designed to reflect the likelihood of detecting dormice, if present. This scoring system acts as an indicator of survey thoroughness and is calculated based on two main factors: the number of nest tubes deployed and the duration (in months) for which they were in place.

2.18 Each month is weighted according to the expected likelihood of detecting dormice activity during that period, following the guidance set out by Chanin & Woods (2003), as shown in Table 1 below.

Month	Weighting
April	1
May	4
June	2
July	2
August	5
September	7
October	2
November	2

Table 1: Monthly Score Weighting (Chanin & Woods 2003)

2.19 The index of effort is calculated using a baseline of 50 nest tubes as the standard minimum. A total score of 20 or more is considered indicative of a

thorough survey. Scores between 15 and 19 may be regarded as adequate in situations where constraints (e.g. time, access) prevent a higher level of effort, particularly if other survey methods have also returned negative results.

2.20 Monthly monitoring surveys were conducted on 24 June, 18 July, 20 August, and 25 September 2025.

Bats

2.21 Field surveys for bats were undertaken with regard to best practice guidelines issued by Natural England, the Joint Nature Conservation Committee and the Bat Conservation Trust.

Building and Tree Assessment

2.22 Specific bat surveys were undertaken in May 2025 to assess the potential for roosting bats within any trees and buildings / structures within the Site. The work was undertaken by an experienced bat worker and aimed to establish the likelihood of the presence or absence of bats.

2.23 The probability of a building / structure being used by bats as a summer roost site increases if it:

i. is largely undisturbed;
ii. dates from pre-20th Century;
iii. has a large roof void with unobstructed flying spaces;
iv. has access points for bats (though not too draughty);
v. has wooden cladding or hanging tiles; and
vi. is in a rural setting and close to woodland or water.

2.24 Conversely, the probability decreases if a building / structure is of a modern or prefabricated design / construction, is in an urban setting, has small or cluttered roof voids, has few gaps at the eaves or is a heavily disturbed premises.

2.25 The main requirements for a winter / hibernation roost site are that it maintains a stable (cool) temperature and humidity. Sites commonly utilised by bats as winter roosts include cavities / holes in trees, underground sites and parts of buildings. Whilst different species may show a preference for one of these types of roost site, none are solely dependent on a single type.

2.26 In addition, all trees at the Site were appraised for their potential to support bat roosts. For a tree to be classed as having some potential for roosting bats it must usually have one or more of the following characteristics:

i. obvious holes, e.g. rot holes and old woodpecker holes;

ii. dark staining on the tree below a hole;

iii. tiny scratch marks around a hole from bats' claws;

iv. cavities, splits and/or loose bark from broken or fallen branches, lightning strikes etc.; and

v. very dense covering of mature Ivy *Hedera helix* over trunk.

Activity Surveys

2.27 Bat activity surveys were undertaken at the Site between May and October to determine whether the habitats present are of any importance for foraging and commuting bats. Activity surveys were undertaken twice a month on the following dates: 20 May, 12 June, 30 June, 17 July, 31 July, 13 August, 2 September, 17 September, and 7th October. Surveyors walked transects around the Site, taking in any features of potential interest for commuting and foraging bats and recording any bat activity. Surveys started at sunset and lasted for approximately two to three hours.

2.28 Following the activity surveys, three Song Meter 4-FS static detectors were left out overnight in strategic locations within the Site to ascertain the level of bat activity throughout the night. The location of these detectors is shown on the Plan ECO3. An additional static detector was deployed in September to gain a better understanding of bat movement across the site, in line with the proposed development, following analysis of data from the initial survey months.

2.29 Echo Meter Touch 2 Pro bat detectors were used for the activity, with all data recorded subsequently analysed using Kaleidoscope bat sound analysis software.

2.30 All the surveys were completed during favourable weather conditions, with further detail provided in Table 2.

Date	Temperature	Weather conditions
20.05.25	18^{0}C	cloud cover 20%, Dry
12.06.25	16^{0}C	cloud cover 10%, Dry
30.06.25	19^{0}C	cloud cover 20% Dry
17.07.25	21^{0}C	cloud cover 15%, Dry
31.07.25	20^{0}C	cloud cover 15%, Dry
13.08.25	19^{0}C	cloud cover 100%, Dry
02.09.25	16^{0}C	cloud cover 95%, Dry
17.09.25	17^{0}C	cloud cover 100%, Dry
07.10.25	14^{0}C	cloud cover 25%, Dry

Table 2: Bat activity survey weather conditions

Reptiles

2.31 Reptile surveys were undertaken within areas of suitable habitat for this group within the Site. On the 14 May 2025 a total of 124 'tins' (0.5 x 0.5 metre squares of heavy roofing felt which are often used as refuges by reptiles) were distributed over the suitable reptile habitat within the Site.

2.32 These tins were left in place for at least two weeks to 'bed in' and subsequently surveyed for reptiles beneath or upon the tins during suitable weather conditions.

2.33 The tins provide shelter and heat up quicker than the surroundings in the morning and can remain warmer than the surroundings in the late afternoon. Being ectothermic (cold blooded), reptiles use them to bask and raise their body temperature which allows them to forage earlier and later in the day

2.34 Surveys were undertaken during suitable weather conditions over seven visits between June and September, as outlined in Table 3.

Date	Weather summary
05.06.25	13^{0}C, 100% cloud cover
13.06.25	18^{0}C, 75% cloud cover
25.06.25	19^{0}C, 100% cloud cover
02.07.25	18^{0}C, 20% cloud cover
08.07.25	17^{0}C, 40% cloud cover
14.08.25	19^{0}C, 30% cloud cover
02.09.25	16^{0}C, 100% cloud cover

Table 3: Reptile survey weather conditions

Assumptions and Limitations

2.35 As with all ecological surveys, there is potential for some species to be missed due to seasonal or temporal constraints. However, the timing of the botanical survey in mid-May coincides with a suitable period for assessment, ensuring that representative plant species present were identifiable. The species-specific surveys were all undertaken regarding recognised methodologies and during appropriate seasonal windows. As a result, the data collected is considered to represent an accurate and comprehensive picture of the Site's habitat value. On this basis it is considered that the survey information available forms a robust basis on which to undertake an assessment.

2.36 With respect to bats and detector-based surveys, it is recognised that automated detector–based species identification is subject to inherent limitations, particularly in relation to Myotis and Nyctalus / Eptesicus species groups, which exhibit overlapping echolocation call frequencies and structures. Consequently, automated identifications are treated as indicative and have been subject to manual review by an experienced bat ecologist. In instances where diagnostic certainty is insufficient, records are reported to genus level (e.g. *Myotis* sp., *Nyctalus* sp.) in accordance with BCT guidance. It is also acknowledged that detector surveys represent a sample of periods of bat activity and detectability; therefore, a lack of registrations does not necessarily confirm absence of a species from the survey area.

3. ECOLOGICAL BASELINE

3.1 In this section, available information is presented that highlights designated sites nearby, baseline habitat conditions of the Site, and the suitability of the Site to support protected and notable species. Reference is made to data search information where appropriate.

Designated sites

3.2 The Site does not form part of any site designated for its nature conservation value, nor does any such designated site exist in the immediate vicinity of the Site.

3.3 The closest Habitats Sites are the East Devon Pebblebed Heaths Special Area of Conservation (SAC) and East Devon Heaths Special Protection Area (SPA) which are contiguous at their closest point to the Site. These sites are located approximately 4km southwest of the Site and are underpinned by the East Devon Pebblebed Heaths SSSI.

3.4 The East Devon Pebblebed Heaths SAC / SSSI is designated primarily for its European dry heaths and Northern Atlantic wet heaths with cross-leaved heath, both priority habitats under the Habitats Directive. The site also supports important populations of invertebrates, reptiles, and heathland flora associated with these habitats. The East Devon Heaths SPA is designated under the Birds Directive for its breeding populations of Nightjar *Caprimulgus europaeus* and Dartford Warbler *Sylvia undata*, which depend on the mature and regenerating heathland mosaic for nesting and foraging.

3.5 For clarity, the Site is located within the Zone of Influence for the Pebblebed Heath Habitats Site. In addition, the Pebblebed Heaths are further designated as the Pebblebed Heaths National Nature Reserve NNR. The locations of these designated sites are shown at Appendix 1.

3.6 The next nearest designated sites are Ladram Bay to Sidmouth SSSI, Sidmouth to Beer Coast SSSI, Sidmouth to West Bay SAC, Otter Estuary SSSI and Budleigh Salterton Cliffs SSSI. All of these designated sites are in excess of 8km from the Site.

3.7 In relation to non-statutory designated sites, there are no such designated sites located within the Site. The data search did return records of Salston Barton Other Site of Wildlife Interest (OWSI) that overlaps minimally with the Site's

northwestern corner. The OWSI is noted for its scrub and riverside tall herb vegetation. In addition, along the western boundary is the Otter Valley Bottom Unconfirmed Wildlife Site (UWS) that is noted as potential floodplain grazing marsh.

3.8 For clarity, an OWSI are defined as sites of significant wildlife interest within a local context, which have been surveyed but do not reach the criteria for County Wildlife Sites (CWS). They are not covered by the National policy, but may be included in Local Plans.

3.9 UWSs are identified as having possible wildlife interest but not fully surveyed. Some of these will be sites of significant wildlife interest. The UWS dataset may also contain proposed County Wildlife Sites (labelled pCWS): these are usually sites that have been surveyed but are awaiting consideration by the CWS Designation Panel, or sites that have been surveyed at an unfavourable time of year and are awaiting a re-survey.

Ancient Woodland and Priority Habitat

3.10 There is no Ancient Woodland located within or adjacent to the Site.

3.11 Some woodland associated with the River Otter corridor to the west of the Site is classified as being UK Priority Habitat – Deciduous Woodland. Parts of this corridor are also noted to comprise the UK Priority Habitat – Coastal and Floodplain Grazing Marsh.

Habitats

3.12 The Site was subject to Phase 1 habitat survey work in May 2025. The vegetation present enabled the habitat types to be satisfactorily identified and an accurate assessment of the ecological interest of the habitats to be undertaken

3.13 The following main habitat / vegetation types were identified:

i. Improved Grassland;

ii. Rank Grassland;

iii. Ruderal Vegetation;

iv. Hedgerows/treelines;

v. Woodland;

vi. Bareground; and

vii. Building and Harstanding.

3.14 Each habitat present is described below with an account of their representative plant species. The location of these habitats is shown on Plan ECO2.

Improved Grassland

3.15 Broadly, the Site comprises grassland under agricultural management as silage fields with a small field to the east also used as grazed pasture. The grassland is dominated by what is considered to be a seeded sward composed primarily of rye grasses such as Perennial Rye-grass *Lolium perenne* and White Clover *Trifolium repens*, characteristic of agriculturally improved grassland managed for silage production. The sward's short height, sparse and even structure indicate regular management, likely due to cutting and fertilisation.

3.16 Other species recorded within the sward, though at lower frequencies, include Broad-Leaved Dock *Rumex obtusifolius*, Curled dock *Rumex crispus*, Rough-Stalked Meadow Grass *Poa trivialis*, Creeping Buttercup *Ranunculus repens*, Yorkshire Fog *Holcus lanatus*, Sweet Vernal Grass *Anthoxanthum odoratum*, Red Dead-Nettle *Lamium purpureum*, and Shepherd's Purse *Capsella bursa-pastoris*. The distribution of these species suggests some degree of limited ecological variability within the fields, but the overall community remains indicative of improved, heavily modified and species-poor agricultural grassland.

Rank Grassland

3.17 To the northwest of the Site is an area of grassland associated with a low topological point in the context of the Site. This area has a taller and more rank sward which in combination with its species composition makes it distinct compared to the silage fields. Species recorded include Common Nettle *Urtica dioica*, Yorkshire Fog, Cock's-Foot Grass *Dactylis glomerata*, Meadow Foxtail *Alopecurus pratensis*, Creeping Buttercup and Bulbous Buttercup *R. bulbosus*.

Ruderal Vegetation

3.18 Ruderal vegetation occurs in localised areas across the Site, typically associated with disturbed ground and areas of nutrient enrichment. These stands generally lack significant areas of bare or open ground and are

characterised by a mix of tall herbaceous (forb) species, often dominated by one or a small number of species.

3.19 Species recorded includes; Common Nettle, Teasel *Dipsacus fullonum*, Perennial Rye-Grass, False Oat-Grass, Soft Brome *Bromus hordeaceus*, and Buddleia *Buddleja davidii*.

3.20 On the boundary adjacent to the offsite farm buildings and along a linear strip between the southern end of Treeline H4 and the farm buildings, nettle beds have developed that also include a limited number of woody species. The woody plants present are Elder *Sambucus nigra*, Grey Willow *Salix cinerea* subsp. *oleifolia*, and Bramble. The ground flora is also includes: Great Brome *Anisantha diandrus*, Burdock *Arctium* sp., Cleavers, White Dead-nettle, Teasel, Broad-leaved Dock, and Common Nettle.

3.21 Alongside footpaths, northern boundary next to rear gardens and around the bases of telegraph poles are areas of ruderal vegetation. Species recorded include; Broad-leaved Dock, Cow Parsley, Common Nettle, Bramble, Cock's-Foot and Barren Brome.

Hedgerows / treelines

3.22 Several hedgerows and treelines, are present within and at the boundaries of the Site. In the main, the hedgerows and treelines are well maintained with good structure although some were noted to contain gaps along their length. Woody species recorded across the hedgerows and tree lines included English Elm *Ulmus procera*, Blackthorn *Prunus spinosa*, Hazel *Corylus avellana*, Holly *Ilex aquifolium*, Common Hawthorn *Crataegus monogyna*, Field Maple *Acer campestre*, Elder *Sambucus nigra*, Privet *Ligustrum* sp., Pedunculate Oak *Quercus robur*, Bramble *Rubus fruticosus* agg., and Ash *Fraxinus excelsior*. Each of the hedgerows are described further below with locations of each feature shown graphically on Plan ECO2.

3.23 Hedgerow **H1** is approximately 2 metres tall and 2 metres wide that runs adjacent to the access track. The woody species include English Elm, Blackthorn, Dog Rose, Hawthorn, Privet *Ligustrum ovalifolium*, Bramble, and Pedunculate Oak. The ground flora includes Cleavers, White Dead-nettle, Red Campion *Silene dioica*, Greater Stitchwort *Stellaria holostea*, Rough Meadow-grass *Poa trivialis*, and Broad-leaved Dock.

3.24 Hedgerow **H2** is approximately 2.5 metres tall and 2 metres wide, with a large gap in the southern section. It contains English Elm, Hazel, Elder, Ivy *Hedera helix*, Blackthorn, Dog Rose, Oak hybrid *Quercus* x *rosacea*, Dogwood *Cornus sanguinea*, and Ash. The herbaceous layer includes Broad-leaved Dock, Creeping Thistle *Cirsium arvense*, and Cow Parsley.

3.25 Hedgerow **H3** is approximately 2 metres tall, 1.5 metres wide, with defunct sections along its length. The woody species include Field Maple, Hazel, Pedunculate Oak, Dog Rose, Bramble, Elder, and English Elm. The ground flora includes Bluebell *Hyacinthoides non-scripta*, White Dead-nettle, Cleavers, Common Nettle, Bracken *Pteridium aquilinum*, Greater Stitchwort, Barren Brome, Cut-leaved Crane's-bill *Geranium dissectum*, Shining Crane's-bill *Geranium lucidum*, Common Vetch *Vicia sativa* subsp. *segetalis*, Creeping Buttercup *Ranunculus repens*, Green Alkanet, Rough Meadow-grass, Cow Parsley, White Mustard *Sinapis alba*, and Red Campion

3.26 Treeline **H4** is approximately 15 metres tall and 2 metres wide. The woody species present are Ash, Blackthorn, Hazel, Hawthorn, and Field Maple. The ground flora includes Cleavers, Cow Parsley, and Common Nettle.

3.27 Hedgerow **H5** is approximately 6 metres tall and 2 metres wide, with a relatively sparse woody component. The woody species include Field Maple, Blackthorn, and Hazel. The ground flora includes Broad-leaved Dock, Creeping Buttercup, Common Nettle, False Oat-grass *Arrhenatherum elatius*, Cock's-foot *Dactylis glomerata*, and Cow Parsley.

3.28 Hedgerow **H6** is approximately 4 metres tall and 2 metres wide, with a mix of shrub and tree species. The woody species include English Elm, Blackthorn, Bramble, and Willow *Salix* sp. The herbaceous flora includes Common Nettle, Creeping Buttercup, Hedge Bindweed *Calystegia sepium*, Cleavers, Barren Brome and Cow Parsley.

3.29 Hedgerow **H7** is approximately 4 metres tall and 2 metres wide, with trees reaching up to 18 metres. The woody species include Pedunculate Oak, Elder, and English Elm. The herbaceous flora includes Hemlock and Common Nettle.

3.30 Hedgerow **H8** is approximately 3 metres tall and 3 metres wide, with trees reaching up to 18 metres. The woody species include Sycamore, Field Maple, Hazel, Dog Rose, Bramble, and English Elm. The ground flora includes Common Nettle, Barren Brome, Cock's-foot, Perennial Rye-grass, Cleavers,

Creeping Thistle, Hemlock *Conium maculatum*, Green Alkanet, Red Campion, and Bittersweet *Solanum dulcamara*.

Woodland

3.31 To the west of the Site lies the River Otter and its riparian corridor which is dominated by a mix of woodland, scrub and grassland. The woodland is set on a steep slope with the following species recorded; Sycamore, Elm *Ulmus* sp., Cow Parsley *Anthriscus sylvestris*, Scaly Male-Fern *Dryopteris affinis* agg., Hazel, Hogweed *Heracleum sphondylium*, Bluebell *Hyacinthoides non-scripta*, blackthorn *Prunus spinosa*, Horse Chestnut *Aesculus hippocastanum*, Wild Cherry *Prunus avium*, and Pedunculate Oak.

3.32 The invasive non-native species Himalayan Balsam *Impatiens glandulifera* was also noted along the riparian corridor within the woodland.

Bare ground

3.33 Areas of bare ground are present where material has been stockpiled and where regular vehicular access is made. This is restricted to the field access to the east of the Site. Some sparse vegetation is present, which is similar in composition to the ruderal vegetation described above.

Building and Hardstanding

3.34 A single livestock shelter, constructed of timber and corrugated metal sheeting, with an open-fronted on the northwestern elevation is also present onsite.

3.35 Leading to the farmhouse adjacent to the Site is an access that is comprised of hardstanding.

Faunal Species

3.36 The results of species-specific surveys are set out below.

<u>Bats</u>

Building and tree assessment

3.37 The Site supports several mature hedgerows, scattered trees and a line of unmanaged trees along the north-western boundary. These features offer good potential for use by foraging and commuting bats. However, it is noted that connectivity is poor through the majority of the Site, with limited internal

hedgerows present. No confirmed roost features were recorded within the Site itself.

3.38 The onsite livestock shelter is considered to offer negligible roosting habitats. This is due to the lack of enclosed roosting features (such as the open front) and the type of construction materials (timber and corrugated metal), which do not provide the stable microclimates typically preferred by bats.

3.39 Trees onsite are considered to be of low bat roosting potential at best, with a general lack of features that could be utilised by bats for roosting observed.

Activity surveys

3.40 Bat activity surveys were undertaken across the Site to ascertain any features of any particular significance for foraging and commuting bats, as outlined in section 2 above.

Activity Survey 20 May

3.41 The activity survey undertaken on 20 May recorded a total of 231 registrations, most of which were Common Pipistrelle (80) and Soprano Pipistrelle (71). Other species recorded were Serotine (31), Leisler's Bat (28) and Noctule (5). A single registration was recorded for each of Nathusius' Pipistrelle and Brown Long-eared Bat.

Activity Survey 12 June

3.42 The activity survey undertaken on 12 June recorded a total of 312 registrations, most of which were Common Pipistrelle (149) and Soprano Pipistrelle (117). Other species recorded were Serotine (37) and Noctule (5). A single registration was recorded for each of the following bat species: Daubenton's, Leisler's, Nathusius' Pipistrelle, and Brown Long-eared Bat.

Activity Survey 1 July

3.43 The activity survey undertaken on 1 July recorded a total of 276 registrations, most of which were Noctule (95), Soprano Pipistrelle (83) and Common Pipistrelle (82). Other species recorded were Leisler, Serotine and Nathusius' Pipistrelle.

Activity Survey 17 July

3.44 The activity survey undertaken on 17 July recorded a total of 207 registrations, most of which were Common Pipistrelle (96), Soprano Pipistrelle (67) and

Noctule (34). Other species recorded were Serotine (6), Barbastelle (3) and Nathusius' Pipistrelle.

Activity Survey 31 July

3.45 The activity survey on 31 July recorded a total of 119 registrations, with the most common species being Common Pipistrelle (73) and Soprano Pipistrelle (40). Other species recorded included Noctule (2), and single registrations of Serotine, Whiskered bat, Leisler's, and Nathusius' Pipistrelle.

Activity Survey 13 August

3.46 The activity survey on 13 August recorded a total of 98 registrations, most of which were Common Pipistrelle (49) and Soprano Pipistrelle (39). Other species included Noctule (4), *Myotis* spp. (3), and single registrations of Serotine, Leisler's and Nathusius' Pipistrelle.

3.47 *Activity Survey 2 September*

The activity survey on 2 September recorded a total of 186 registrations, the majority of which were Soprano Pipistrelle (82) and Noctule (49). Other species recorded included Common Pipistrelle (38), Leisler's bat (4), Brown Long-eared Bat (3), Serotine (3), *Myotis* spp. (2), Daubenton's Bat (1), and Natterer's Bat (1).

Activity Survey 17 September

3.48 The activity survey on 17 September recorded a total of 236 registrations, most of which were Common Pipistrelle (115) and Soprano Pipistrelle (94). Other species recorded included Noctule (11), Brown Long-eared Bat (6), Serotine (4), Leisler's (4) and single registrations of *Myotis* sp and Grey long-eared bat.

Activity Survey 7 October

3.49 The activity survey on 7 October recorded a total of 145 registrations, most of which were Soprano Pipistrelle (114) and to lesser extent Common Pipistrelle (29). Other species included single registrations of Noctule and Brown Long-eared Bat.

Summary

3.50 Bat activity surveys undertaken throughout the active period of 2025 show that most of the bat activity can be attributed to Common pipistrelle and Soprano pipistrelle. Activity levels were highest during the June 12 survey, with the

highest overall registrations recorded. All other species recorded were Noctule, Serotine, *Myotis* spp., Daubenton, Leisler, Nathusius' Pipistrelle, Whiskered Bat, Grey Long-eared Bat, and Brown Long-eared Bat.

3.51 Given the generally sporadic and low numbers of registrations for notable species such as Barbastelle, Grey Long-eared Bat and Brown Long-eared Bat, it is considered that the Site is used occasionally by individual bats or a small number of individuals.

Static Detector Surveys

3.52 Two bat surveys per month were undertaken since May, in line with the methodology outlined in section 2 above. The full results of the 2025 surveys are tabulated in Appendix 2.

Automated Detector Survey 20 May – 25 May

3.53 The automated detector survey, conducted between 20th May and 25th May, recorded mostly consistent bat activity at locations D1 (located at the woodland edge to the west) and D2 (located to the north of the Site along H4). However, location D3 (to the south of the Site along hedgerow H2) showed noticeably higher levels of activity, registering nearly twice as much bat activity as D1 and D2.

3.54 The detector placed at D1 recorded the lowest number of bat registrations, with most of these registrations consisting of Soprano Pipistrelle and Common Pipistrelle. However, several notable species were also recorded in relatively high numbers at this location, including Greater Horseshoe Bat (49 registrations) and Barbastelle (232 registrations).

3.55 The detector placed at D2 was the only one to register Alcathoe Bat, with a total of 14 registrations, all recorded on a single night.

3.56 The detector placed at D3 recorded the highest number of bat registrations. As with the other locations, most of the registrations were Soprano Pipistrelle and Common Pipistrelle, and to a lesser extent Serotine. D3 also recorded the highest total registrations of the notable species Barbastelle (1,161 total registrations) and Grey Long-eared Bat (32 registrations).

Automated Detector Survey June 12 – 17

3.57 The automated detector survey, undertaken over this period, showed mostly consistent activity within the Site. The highest number of registrations across all three locations were from Common Pipistrelle and Soprano Pipistrelle, with Noctule and Serotine also recorded to a lesser extent. However, there were notable differences in the number of registrations between the statics.

3.58 The detector placed at D1 recorded the highest amount of bat registrations (47,955). Although Soprano Pipistrelle made up approximately three-quarters of the registrations (33,221). Other notable species were recorded in low numbers, including Grey Long-eared Bat (10 registrations), Greater Horseshoe Bat (12 registrations), and Barbastelle (17 registrations).

3.59 The detector placed at D3 recorded the lowest amount of bat registrations (5,371). However, D3 recorded the highest number of registrations for notable species, including Lesser Horseshoe Bat (414 registrations), Barbastelle (94), and Grey Long-eared Bat (24). Although most of these calls were recorded on singular nights rather than across the survey period.

Automated Detector Survey June 30th to 7th July

3.60 The automated detector survey undertaken between June 30th to 7th July showed mostly consistent activity within the Site, with the highest bat registrations of Common and Soprano Pipistrelle, and to a lesser extent Noctule.

3.61 The detector placed at location D1 experienced technical difficulties resulting in no recordings being made for this survey period. However, given the coverage provided by the other detectors deployed, this is not considered to have significantly impacted the robustness of the survey.

3.62 The detector placed at D2 recorded the highest number of total registrations (53,484). A small number of notable species such as Barbastelle (14 registrations) and Greater Horseshoe Bat were also recorded (73 registrations).

3.63 The detector placed at D3 recorded a similar total number of registrations (39,356). However, D3 had a notably higher number of species detected, including several species recorded only at this location: Whiskered Bat (10), Brown Long-eared Bat (51), Daubenton's Bat (70), and Grey Long-eared Bat (119). It's worth noting that most of these calls were concentrated on specific days rather than consistently throughout the entire survey period.

Automated Detector Survey July 17th – 22nd

3.64 The automated detector survey undertaken between July 17th – 22nd showed mostly consistent results with the highest bat registrations of Common Pipistrelle and Soprano Pipistrelle.

3.65 The detector placed at D2 recorded highest number of total registrations (74,003), however most registrations were Common pipistrelle and Soprano pipistrelle, and to a lesser extent Noctule. A small number of notable species such as Grey Long-eared Bat (12 registrations) and Greater Horseshoe Bat were also recorded (50 registrations).

3.66 The detector placed at D3 recorded the lowest amount of bat registrations (44,165). Despite the lower overall activity, D3 detected the notable species Barbastelle (10 registrations) that were not recorded at the other locations. As well as Grey long-eared Bat (36 registrations) and Greater Horseshoe Bat (31 registrations).

Automated Detector Survey 31st July – 5th August

3.67 The automated detector survey conducted between 31st July and 5th August recorded frequent bat activity across the Site, although levels of activity varied between detectors and across different nights, with some nights showing noticeably higher levels of registrations than others.

3.68 The detector placed at D2 recorded the highest number of total registrations (30,175), with most registrations being Common pipistrelle and Soprano pipistrelle, and to a lesser extent Noctule, *Myotis* spp. Barbastelle were also recorded, with 12 registrations.

3.69 The detector placed at D3 recorded the lowest amount of bat registrations (5,695). However, it recorded notable species such as Grey long-eared bat (10 registrations), Barbastelle (12 registrations) and the highest Serotine activity overall (456 registrations).

3.70 The detectors placed at locations D1 and D2 experienced technical difficulties, resulting in fewer recordings during the survey period. However, given the longer coverage provided by D3, which recorded for a full six consecutive nights (compared to four nights at D2 and three nights at D1), this is not considered to have significantly impacted the robustness of the survey.

Automated Detector Survey 13th August – 19th August

3.71 The automated detector survey undertaken between 13th August – 19th August showed mostly consistent results with the highest bat registrations of Common and Soprano Pipistrelle across all locations.

3.72 The detector placed at D1 recorded the highest number of total registrations (58,935), with most registrations being Common Pipistrelle and Soprano Pipistrelle, and to a lesser extent Noctule. D1 also detected the highest number of Barbastelle (162 registrations).

3.73 The detector placed at D3 recorded the lowest number of bat registrations (7,241). However, it recorded notable species such as Grey Long-eared Bat (35 registrations), Barbastelle (87 registrations) and Greater Horseshoe Bat (36 registrations).

3.74 The detector placed at D2 recorded notable species, including the highest number of Grey Long-eared Bats (215 registrations) and exclusive detection of Whiskered Bat (169 registrations) and Natterer's Bats (24).

3.75 It is important to note D1 recorded for seven consecutive nights, D2 for five consecutive nights and D3 for eight consecutive nights.

Automated Detector Survey 2nd September – 8th September

3.76 The automated detector survey undertaken between *2nd September – 8th September* showed mostly consistent results with most registrations consisting of Common Pipistrelle and Soprano Pipistrelle.

3.77 The detector placed at D1 recorded the highest number of total registrations (3,069), with most registrations being Soprano Pipistrelle (2,078), and to a lesser extent Noctule (465). Other notable species recorded included Barbastelle (22 registrations) and Greater Horseshoe Bat (5 registrations).

3.78 The detector placed at D3 recorded the lowest number of bat registrations (418). However, D3 did exclusively record one registration of Bechstein's Bat. As well as notable species Barbastelle (55 registrations), Greater horseshoe bat (2 registrations) and Grey Long-eared Bat (6 registrations).

Automated Detector Survey 17th September – 22nd September

3.79 The automated detector survey undertaken between 17th September – 22nd September showed mostly consistent results with most registrations consisting of Common Pipistrelle and Soprano Pipistrelle.

3.80 The detector placed at D3 recorded the highest number of total registrations (8,284), with most registrations being Soprano pipistrelle (5,661) and Common pipistrelle (2,568). Other notable species recorded included Barbastelle (5 registrations) and Greater Horseshoe Bat (3 registrations).

3.81 In addition to the other detectors deployed, a detector was also placed at location D4. This was in response to initial design layouts that showed that the linear ruderal vegetation the forms part of a field boundary was to be lost. It was considered that the supplementary detector location would assist in assessing the value of the linear vegetation within the context of wider Site activity. D4 recorded the lowest number of bat registrations (740). Other notable species recorded included Barbastelle (8 registrations), Greater Horseshoe Bat (2 registrations) and Grey Long-eared Bat (3 registrations).

3.82 The detector placed at D2 recorded the highest number of Barbastelle (13 registrations) and Grey Long-eared Bat (13 registrations).

Automated Detector Survey 7th October - 12th October

3.83 The automated detector survey undertaken between *7th October - 12th October* showed mostly consistent results with registrations primarily being of Common and Soprano Pipistrelle.

3.84 The detector placed at D2 recorded the highest number of total registrations (3,543), with most registrations being Common Pipistrelle (1,779) and Soprano Pipistrelle (1,448). Other notable species recorded included Grey Long-eared Bat (8 registrations) and Lesser Horseshoe Bat (9 registrations).

3.85 The detector placed at D3 recorded the lowest number of bat registrations (105 registrations), with only 7 bat species recorded.

Summary

3.86 Automated surveys undertaken throughout the active period of 2025 across all detectors recorded up to 17 bat species (noting that potential limitations of detector-based identification for certain species). However, 95.3% of registrations recorded can be attributed to either Common Pipistrelle, Soprano Pipistrelle and / or Noctule. Other species detected included Nathusius' Pipistrelle, Leisler's Bat, Serotine, *Myotis* species (including Daubenton's Bat, Brandt's Bat, Whiskered Bat, Natterer's Bat, Alcathoe Bat, and Bechstein's Bat, whilst again noting the limitations on detector-based identification), Lesser

Horseshoe Bat, Greater Horseshoe Bat, Barbastelle, Brown Long-eared Bat, and Grey Long-eared Bat.

3.87 Monthly trends showed May had the highest activity with a total of 235,855 registrations across all three statics. This was followed by a gradual decline in activity from August onward. While Detector 2 had the highest number of registrations, all detectors registered a range of species across the survey period.

3.88 Notable species such as Barbastelle (0.27% of registrations), Greater Horseshoe (0.05% registrations) and Grey long eared bat (0.08% of registrations) were recorded, although generally in low numbers and with inconsistent detections over the survey period. For example, for Barbastelle the highest registrations were detected during the 20th–25th May survey with 1,161 registrations at location D3, and a total of 1,493 across all statics suggesting that this species was regularly foraging / commuting though the hedgerow network to the south of the Site at this time. In contrast, some surveys, such as 17th–22nd July survey, recorded as few as 10 total registrations across all statics (see Appendix 2 for tabulated results). This demonstrates that such species are not reliant on the Site and adjacent areas throughout the year.

3.89 In addition, based on the disparity of bat activity across the detectors, it is considered that the bat population utilise the network of hedgerows and woodland within the wider landscape further to the south and east to commute to and from the Site, as well as through the Site to the riparian corridor, albeit the existing link is not direct. However, whilst the boundary features are of value, within the context of the Site, it is considered that the central areas of the Site (such as where detector D4 was deployed) are comparatively of significantly less value.

3.90 **Background records:** DBRC returned several Bat records including a 2014 observation within the Site boundary involving low numbers of *Pipistrelle* and *Myotis* spp. Additional records in the local area include *Plecotus* sp. (100 m east, 2012), Barbastelle and *Myotis* spp. (150 m east, 2017), and a 2008 roost of Common Pipistrelle and Soprano Pipistrelle, with associated foraging activity 400 m north. A 2013 emergence survey 450 m northeast recorded Noctule, Serotine, Long-eared Bats, and Brown Long-eared Bat. The data also identified Nathusius' Pipistrelle and Lesser Horseshoe Bat using a static detector.

Badger

3.91 The Site offers foraging and sett building opportunities for Badgers. The habitat on Site is broadly suitable for Badger, with areas along boundaries and within hedges that could support sett creation. However, the majority of the Site is dominated by intensively managed grassland and disturbed ground, which offers limited foraging opportunities.

3.92 No evidence of Badger activity (e.g. setts, latrines, foraging signs or paths) was observed during the field survey. Given the available habitat and lack of field signs, the Site is considered to have limited potential for badger presence, although given the mobile nature of the species, further monitoring may be necessary.

3.93 **Background records**: DBRC returned records of Badger to the southeast of the Site in 2002 and again approximately 950 m to the south.

Hazel Dormouse

3.94 The Site includes several native hedgerows, some of which are relatively species rich. These linear features support species such as hazel, which as discussed in the methodology section above are known to be valuable to Dormice.

3.95 Monthly checks were undertaken from June onwards, along the hedgerows and along the woodland edge on the Site, in line with the Methodology outlined in Section 2.

3.96 During the September 2025 survey an individual Dormouse and its nest were recorded in a nest tube located towards the north west of the Site, in the hedgerow bordering the woodland (location illustrated on Plan ECO3). It is therefore considered that Dormice are present within suitable habitat within the Site. However, it is important to consider the availability of habitat and the potential connectivity of habitats onsite. It should be noted that whilst Dormouse are present in the west of the Site, along the woodland edge, there is very limited suitable habitat that directly connects the woodland to the onsite hedgerow network, and it is considered that the hedgerows within the centre and eastern parts of the Site are not of significant value to Dormouse. Indeed, no evidence of Dormouse has been identified within these areas.

3.97 **Background records:** The desk study did not identify any records of Hazel Dormice from the Site or local area.

Great Crested Newt

3.98 The Site consists primarily of improved grassland, with no ponds or waterbodies recorded within the Site during the survey.

3.99 As outlined in the methodology, a recent ecology survey (Richard Green Ecology, 2024) identified a pond located approximately 280m south of the current survey area, at Knightstone Farm. The Habitat Suitability Index (HSI) assessment of this pond returned a score of 0.78, indicating average suitability for GCN. Subsequently, an environmental DNA (eDNA) survey was carried out to determine the presence or absence of the species. The eDNA results returned a negative result.

3.100 A field drain associated within the northern boundary was inspected during the surveys onsite and found to be dry throughout the period. A ditch to the west of the Site that is linked to the River Otter was also inspected and noted to have a significant flow. As such, both features are considered to be of no value to GCN.

3.101 On this basis, and in the absence of suitable aquatic habitat within the current Site, it is considered likely that GCN are absent from the Site and immediate surroundings.

3.102 **Background records:** DBRC returned a 2016 record of great crested newt located approximately 800 m northeast, in a garden pond.

3.103 In light of the Site's limited suitability for amphibians, the negative eDNA result, and the distance of returned records from the Site, no further consideration is required.

Common Reptiles

3.104 The Site comprises largely improved and intensively managed grassland, which is generally unsuitable for supporting significant reptile populations due to the lack of structural diversity and cover. However, areas at field margins, hedgerow, and woodland edge may provide limited basking or refuge opportunities.

3.105 In light of the above, detailed reptile surveys were undertaken onsite.

3.106 The survey results are summarised in Table 4 below.

Date	Survey Number	Reptiles Recorded
05.06.25	1	1 Female, 5 Juvenile Slow Worms
13.06.25	2	7 Juveniles Slow Worms
25.06.25	3	4 Male, 6 Female, 10 Juveniles Slow Worms
02.07.25	4	No species recorded
08.07.25	5	4 Male, 9 Female, 4 Juvenile Slow Worm
14.08.25	6	3 Juvenile and 2 female Slow Worm
02.09.25	7	1 Male, 9 Juveniles Slow Worms and 1 Grass Snake

Table 4: 2025 Reptile Survey Results

3.107 Slow worms were recorded during refugia surveys, with a peak adult count of ten individuals recorded. These were recorded across the Site, with a maximum count of twenty individuals recorded on any one survey. The highest number of records was observed in the north-west of the site, where slow worms were recorded during four out of seven surveys. The only other species recorded was a Grass Snake, in the north-west of the Site.

3.108 It is therefore considered that the Site is utilised in low numbers by both species. The distribution of reptiles is concentrated to the western part of the Site in association with rank grassland near the riparian corridor, although low numbers were distributed across the Site. Plan ECO3 shows the area where reptiles were most concentrated onsite.

3.109 **Background search:** DBRC returned multiple records of protected and notable species within a 1 km radius of the Site. Adder *Vipera berus* was recorded in 2009 approximately 50 m east of the Site boundary, and Grass Snake was recorded in 2014 around 400 m to the northeast.

Otter and other riparian mammals

3.110 No watercourses, ponds, or wetland features are present within the Site. As both Otter and Water vole are strictly associated with aquatic environments, the Site does not provide suitable habitat to support such species. The offsite river

corridor habitat to the west offers opportunities for Otter, Water Vole and Beavers.

3.111 It is also noted that the River Otter supports populations of Eurasian Beavers *Castor fiber*. It is understood that the origins of the initial individuals present are unknown, but since breeding was recorded several years ago, the populations are now part of a monitored reintroduction programme that covers the River Otter catchment.

3.112 The riparian corridor within proximity to the western boundary of the Site was subject to a specific search for evidence of Otter, Water Vole and Beaver in October 2025. No evidence of any other these species was recorded.

3.113 **Background records:** Several records of Eurasian Otter were noted, including one from 2006 (150 m west), and others between 2011–2016 up to 500 m south. 9 records of Beaver were returned along the River Tale, with closest records 1.27 km approximately north.

Hedgehog

3.114 The hedgerows, field margins, and patches of rougher vegetation provide suitable foraging and commuting habitat for Hedgehog. While the core improved grassland is unlikely to support this species due to limited cover and high disturbance, the connectivity of hedgerows to the wider landscape enhances the Site's suitability. As such, the Site is considered to have some limited potential to support Hedgehogs.

3.115 **Background records:** The data search returned four records of Hedgehogs in 2002 and one in 2001, approximately 450m north of the Site.

Nesting Birds

3.116 The network of mature hedgerows / treelines and scattered trees provide suitable nesting habitat for a range of common bird species. The grassland condition and management are considered to prevent any potential for ground nesting birds. No buildings or structures suitable for Barn Owl nesting were identified within the Site. It is considered that the Site does not support any significant nesting bird populations.

3.117 **Background records:** The data search returned records of several species on the UK Red List for Birds of Conservation Concern: Greenfinch, Lesser Redpoll,

and Redwing, as well as the UK Priority species Kingfisher. All within 2km of the Site.

Invertebrates

3.118 Given the habitats present it is unlikely that the Site will be of significant value to invertebrate species of conservation concern.

3.119 **Background records:** The data search returned several records of invertebrates, with the most notable being the Garden Tiger, a UK BAP Priority species.

3.120 **Invasive species**

3.121 The invasive non-native species Himalayan Balsam *Impatiens glandulifera* was recorded along the riparian corridor within the woodland.

3.122 **Background records:** The data search also highlighted records of invasive non-native species, including Himalayan Balsam with the nearest records located 450 m south of the Site, and Giant Hogweed *Heracleum mantegazzianum*, recorded 900 m southwest in 2013.

4. ECOLOGICAL ASSESSMENT

4.1 The process for ecological assessment and evaluation is set out within CIEEM guidance. The process requires the application of professional judgement to identify and evaluate relevant ecological features within the Site or its Zone of Influence that may be affected by the proposals under consideration.

4.2 The assessment characterises the importance of ecological features and the potential changes arising from the proposals. Consideration is given to the magnitude, extent, duration, reversibility, and timing of impacts, where applicable. In doing so, the evaluation uses professional judgement guided by available legislation, planning policy, guidance and other relevant information.

Designated Sites

Statutory Sites

4.3 No statutory designated sites are within or adjacent to the Site. The nearest such site is the East Devon Pebblebed Heaths SPA have been identified as being vulnerable to recreational pressure, particularly from increased visitor numbers arising from residential and tourism development.

4.4 There is an adopted strategic mitigation solution associated with such impacts, which involve financial contributions from any residential development that falls within the Pebblebed Heath Contribution Zone. The contributions go towards visitor access and management, together with habitat management initiatives.

4.5 The Site falls within the Pebblebed Heath Contribution Zone and any relevant obligations in this regard would be met in respect of the proposals by the applicant secured through a legal obligation, such as through a s106.

4.6 No other likely significant effects are considered to arise on the SPA as a result of the development proposals, either alone or in combination with other plans or project.

Non-Statutory Sites

4.7 The Site boundary overlaps with a very small section of Salston Barton OWSI.

4.8 The change to the management of habitats from agricultural management to a more sensitive and less intensive regime will have potential positive effects on the nearby riparian corridor and associated designations with the removal of fertilisers, herbicides and pesticides that may currently be utilised onsite.

4.9 The riparian corridor will be protected and enhanced with more complementary semi-natural habitats established between the river corridor and any builtform. This can serve to provide a buffer between the development and contribute to the wider ecological network.

4.10 Management plans can be developed to control the presence of invasive non-native species within this area that will also provide a benefit to wider non-statutory designations associated with the River Otter.

4.11 The development footprint is confined to the centre and east of the Site and no direct impacts on CWSs, UWS or OWSIs are considered to arise.

Habitats

4.12 Primarily, low value improved grassland will be lost, in the main, to facilitate development. A significant amount of grassland is to be retained and there is scope to significantly enhance the grassland within the Site. By sowing these areas with a native wildflower seed mixture and adopting an appropriate management regime, it is considered that the biodiversity value can be significantly increased relative to the existing situation.

4.13 The small areas of ruderal habitat and bare ground will be lost under the development proposals, along with areas of hardstanding and buildings. Losses to these habitats are considered to be of negligible ecological significance and do not require specific mitigation. However, in most instances these areas will be integrated into the wider green infrastructure comprised of species rich grassland, native scrub and tree planting that is considered to be of greater ecological value, within the context of the Site.

4.14 The development proposals also involve the removal of some hedgerow sections, primarily for access purposes, though the vast majority of both will be retained and can be enhanced. It should also be noted that hedgerow H6 may back on to new private gardens and as such access for enhancement and management will be limited. On this basis the hedgerow is considered to be retained only. The applicant is committed to keeping such losses to a minimum in any subsequent reserved matters application, and ensuring that overall there is a net increase in hedgerows that provides improved habitat connectivity that is currently lacking within the Site.

4.15 It is proposed that retained hedgerows are enhanced and supplemented through the bolster planting of a range of native species where necessary to

improve the structure and diversity of these features. Appropriate mitigation can be secured in relation to preventing impact on retained hedgerows and trees, such as through appropriate to root protection areas.

4.16 All areas of woodland will be retained in full. The provision of buffer habitats that are species-rich between the woodland and the development footprint, such as new native tree and scrub planting, will complement the existing woodland edge habitats and represent enhancements over the existing situation.

4.17 Moreover, a landscape buffer will be planted around the development footprint, comprising a range of native habitats and species, as indicated in the Green and Blue parameter plan. Of note, the tree-lined western boundary is to be further strengthened through the establishment of more diverse habitats. These will link with proposed open space that runs across the north of the Site and the proposed wildlife corridor to the south of the Site.

4.18 As such, under the development proposals significantly more trees, native shrub and hedgerow will be planted than are lost in the Site The improvement to habitat connectivity through the site are considered a major benefit of the development proposals.

4.19 New wet grassland features will also be incorporated into the drainage scheme and designed to create additional habitats that will deliver significant benefits to biodiversity over the current situation within the Site.

Biodiversity Net Gain

4.20 To meet the requirements of the Environment Act 2021, a minimum of 10% Biodiversity Net Gain (BNG) must be delivered. It is noted that under Policy 87 of the emerging East Devon Local Plan, a minimum target of 20% BNG, exceeding national standards, is targeted. Notwithstanding this, the aim for the emerging proposals will be to achieve at least the nationally required 10% BNG onsite.

4.21 Habitats onsite have been classified according to the UKHab classification system and assessing their condition against Defra’s published condition assessment criteria, the results were inputted into the latest Biodiversity Metric. The habitats were mapped using spatial data analysed in QGIS to calculate area measurement for on-site habitats and post-development scenarios.

4.22 The headline results from the Metric are set out below.

- Habitat units 41.59% increase in value
- Hedgerow units 187.56% increase in value

4.23 The Biodiversity Net Gain assessment is included at Appendix 4 that provides further detail.

Bats

4.24 All bat species in the UK are protected under both the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 (as amended). These laws make it a criminal offence to:

i. Deliberately capture, injure, or kill a bat;

ii. Disturb bats in a way that affects their ability to survive, breed, or rear young; and

iii. Damage or destroy a bat roost, even if bats are not present at the time.

Site Evaluation

4.25 Detailed surveys to assess the Site for features with bat roosting potential were undertaken at the Site in May 2025. No trees of building were identified to have the potential to support roosting bats.

4.26 Static bat surveys were undertaken between May 2025 and October 2025. The survey recorded some variations in activity between individual static detectors. However, overall activity was relatively consistent across the survey period, with the highest activity observed in May, and most registrations attributed to Common Pipistrelle and Soprano Pipistrelle across the survey period. The statics identified a wide range of bat species, which is consistent with the wider location, an area known to support a high diversity of bat species.

4.27 While notable species were recorded, these were generally present in comparably low numbers and does not indicate a significant or locally important population. For instance, the level of use of the Site by Barbastelle recorded during the surveys is relatively low (except in May where initially higher numbers of registrations were recorded) and inconsistent, with activity recorded on singular nights rather than across the survey period. This would suggest the Site is likely not a key regularly used habitat for Barbastelle bats, although

it does offer foraging and commuting habitat that connects across the wider landscape to features of value such as the riparian corridor and hedgerow and woodland network in the wider landscape further to the south and east.

4.28 Barbastelles are primarily associated with woodland habitats, favouring woodland edge habitat and woodland rides. They do however utilise hedgerows for navigating and foraging and will cross open land as part of their wider commuting range. Measures are proposed which will mitigate any perceived impacts and deliver enhancements for the species.

Mitigation and Enhancements

4.29 Given the high levels of bat activity and presence of notable species within the Site such as Barbastelle and Horseshoe Bats, appropriate mitigation measure will be taken.

4.30 The majority of the Site comprises improved grassland, which is considered to be of limited value for the bat species recorded. There is also a general lack of hedgerows or other navigation corridors, especially in the east to west direction. Where sections of hedgerow, which provide foraging habitat, are to be lost, these will be replaced elsewhere to enhance foraging opportunities and commuting networks. The creation of new species-rich grassland and native scrub planting will further enhance foraging opportunities.

4.31 A key piece of the mitigation strategy is to deliver a bat sensitive corridor that will be established to enhance connectivity across the Site. The bat corridor will link existing hedgerows in the east of the Site, with the riparian corridor associated with the River Otter to the west, both areas known to support bat activity.

4.32 The increased light levels are potential constraints for light-sensitive bat species, including barbastelle and horseshoe bats, which are known to occur locally. The bat corridor will be designed to minimise light spill.

4.33 Construction activities during the months of April to October will be limited to daytime hours to avoid light pollution across the surrounding area. This is not applicable to the winter months (November to March inclusive) as during this period bats are in hibernation and activity is generally reduced.

4.34 Should lighting outside of these times be unavoidable (for example for the purpose of safety of security) then the extent of this should be limited as far as

reasonably practicable. A sensitive lighting strategy will also be developed, referring to BCT & ILP (ILP, 2023) guidance, using low-level, warm-white lighting with directional cowls.

4.35 As an enhancement, bat boxes should be installed across the Site, away from light sources, with grouping on suitable trees and buildings where possible. The boxes should support a range of bat species, including known local species such as Common Pipistrelle as well as larger species such as Noctule*,* thereby enhancing roosting opportunities across the Site for a range of bats.

Hazel Dormouse

4.36 Hazel Dormouse are listed as a European Protected Species and are protected under the Conservation of Habitats and Species Regulations 2017 and the Wildlife and Countryside Act 1981. It is illegal to:

i. Capture, kill, or disturb dormice; and

ii. Damage or destroy their breeding or resting places.

Site Evaluation

4.37 The hedgerows within the Site and the woodland adjacent to the Site provide potential habitat for Dormice. Dormouse tube surveys revealed the presence of one nest and a Dormouse in the north west of the Site.

Mitigation and Enhancements

4.38 Given the presence of Dormice within the Site, it is a legal requirement to implement a suitable mitigation strategy. While the recorded nest falls within habitat which is to be retained, it is not possible to conclude that the Dormice do not use the habitat which will be impacted by the proposals. In light of this, it is considered likely that the loss hedgerow habitat will require a Natural England Mitigation License. However, it should be noted that the location of the recorded Dormouse nest is in the west of the Site, within habitat that is largely separate from the proposed hedgerow losses. On this, basis the need for licencing will be reviewed subject to the detailed design of the proposals.

4.39 With reference to the proposals, it is clear that should the development be granted, there will be a significant enhancement across the Site and wider landscape for this species. No habitat severance would occur (indeed, habitat connectivity will be significantly enhanced), and losses would be more than

compensated for through the landscape proposals. Retained boundary features will be enhanced, new hedgerows created as well as the planting of new buffers of native scrub and trees. The sensitive lighting design and bat corridor, as noted for bats, will also benefit dormice further creating green links across the Site.

4.40 The proposed mitigation strategy is based around the following principles:

I. Avoid losses to active nests and minimise disturbance to Dormice, preferably by felling the trees / shrubs to ground level during the hibernation period. No disturbance to root balls or hedge base habitat until outside of the hibernation period:

II. Avoid any potential construction impacts (i.e. incursion of plant) on retained hedgerow habitat through appropriate protective fencing.

III. All hedgerow removal to be overseen by a suitably experienced ecologist acting under the licence.

IV. Replacement/compensatory planting to be delivered as soon as possible. Areas of hedgerow habitat outside the construction area to be enhanced as part of the access creation works, with additional landscape planting delivered towards the end of the development.

V. Provision of 20 Dormouse nesting boxes within retained and enhanced hedgerow habitat.

Nesting Birds

4.41 All wild birds, their nests, and eggs are protected under the Wildlife and Countryside Act 1981. It is an offence to:

i. Kill, injure, or take any wild bird;

ii. Take, damage, or destroy the nest of any wild bird while it is in use or being built; and

iii. Take or destroy the egg of any wild bird.

4.42 In addition to these general protections, certain species are listed under Schedule 1 of the Act. These birds are afforded extra legal protection due to their rarity, vulnerability, or sensitivity to disturbance. For Schedule 1 species, it is also an offence to:

i. Disturb them while they are building a nest or are in, on, or near a nest containing eggs or young; and

ii. Disturb dependent young of such a bird.

Site Evaluation

4.43 The Site is of limited value to nesting birds, although some habitat features are available for this species group, such as hedgerows and trees.

Mitigation and Enhancements

4.44 Hedgerows and trees provide nesting and foraging opportunities for a range of bird species. Vegetation clearance during the breeding season could lead to the destruction of active nests.

4.45 If vegetation clearance, including tree felling, is to be undertaken within the nesting season (March to July inclusive), this should be preceded by a nesting bird check carried out by a suitably qualified ecologist.

4.46 It is recommended that the trees within the site should be safeguarded wherever possible. The retention of the hedgerow will provide continued foraging and nesting opportunities for birds. It is also recommended to sow the remaining greenspace around the development with a species-rich seed mixture, providing new and enhanced foraging opportunities for a range of bird species.

4.47 Simple enhancement measure should also be undertaken, through installing nest boxes on retained trees and buildings. Using a variety of nest box designs would attract a wider range of species, including Red-Listed or Priority Species where possible.

Reptiles

4.48 Smooth snake *Coronella austriaca* and sand lizard *Lacerta agilis* are listed as European Protected Species under the Conservation of Habitats and Species Regulations 2017. It is an offence to:

i. Deliberately capture, kill, or injure individuals;

ii. Deliberately disturb them, particularly in ways that affect breeding, hibernation, or migration;

iii. Damage or destroy breeding sites or resting places, even if the animals are not present; and

iv. Possess, control, transport, or sell individuals (alive or dead) or any part thereof.

4.49 These species are also protected under the Wildlife and Countryside Act 1981, which adds further offences such as:

i. Intentionally or recklessly disturbing them while they occupy a shelter;

ii. Obstructing access to their shelter or resting place

4.50 Common reptile species are protected under Section 9(1) and 9(5) of the Wildlife and Countryside Act 1981, which prohibits:

iii. Intentional killing or injury; and

iv. Sale or trade of wild-caught individuals.

4.51 These species are not protected from disturbance or habitat destruction unless it results in direct harm. However, they are listed as Species of Principal Importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006, meaning they must be considered in planning decisions.

Site Evaluation

4.52 Small populations of Slow-worm and one Grass Snake were recorded during the refugia surveys. The peak adult count of Slow worm was 10 individuals. It is therefore considered that the Site is utilised in low numbers by both species.

Mitigation and Enhancements

4.53 Due to the Site largely comprising of improved grassland, the Site is not considered to be optimal for reptiles, although more suitable habitat was recorded as present within areas of longer grassland are present within field, margins and hedgerows. Therefore, habitat suitable for common reptiles, such as rank grassland, material stockpiles, and hedgerow bases, may be impacted by clearance works, leading to potential injury or death of individuals.

4.54 A translocation / exclusion exercise prior to the commencement of development may be required to safeguard against any reptiles being killed or injured during development work at the site.

4.55 Enhancement measures should also be taken. Hibernacula (e.g., log/brash piles with soil cover) should be installed within retained vegetation corridors. Habitat creation can provide better quality foraging and sheltering habitat as well as improving habitat connectivity. It is considered that the proposals can deliver an overall enhancement for any common reptiles present. The new species rich grassland and enhanced planting buffer of native scrub will represent a significant enhancement for this group.

Badger

4.56 Badgers are protected under the Protection of Badgers Act 1992, which prohibits:

i. Wilful killing, injuring, or taking of Badgers;

ii. Cruelty towards Badgers; and

iii. Interference with Badger setts, including damaging, destroying, or obstructing access to them.

Site Usage

4.57 No evidence of Badger has been recorded onsite, or within the immediate vicinity of the Site.

Avoidance, Mitigation and Enhancement Strategy

4.58 Given the dynamic nature of Badgers it is recommended that ahead of the commencement of development, dense vegetation (e.g. scrub) in areas to be lost to the proposals is subject to a further check survey with clearance undertaken by hand where applicable. In the event that a Badger sett is identified, care should be taken not to block any entrance with debris and some cover should be retained around the entrance. For any setts identified, assessments will need to be made in terms of their level of use by Badgers and any necessary Badger mitigation put forward. A Natural England licence may be required for works which impact a sett. The development proposals provide a significant area of land which is to be managed to deliver ecological enhancements. This area will provide optimal foraging resources for Badgers and numerous sett building opportunities (e.g. within the woodland buffer).

4.59 During the construction phase mitigation is still recommended due to the fact that Badgers are a mobile species. It is recommended that vigilance is

maintained for any fresh digging and appropriate advice sought from an ecologist where necessary. It is also recommended that a means of escape, such as a roughened wooden plank, be provided for Badgers in any trenches or other deep excavations.

4.60 Open trenches should be covered overnight or fitted with escape ramps (e.g., scaffold planks). Excavations should be checked every morning prior to work commencing. No signs of Badger setts were recorded on Site, but vigilance during Site clearance is advised.

Hedgehog

4.61 Hedgehogs are listed as a Species of Principal Importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. While not fully protected under the Wildlife and Countryside Act, they are a conservation priority and must be considered in planning decisions

Mitigation and Enhancement Strategy

4.62 Hedgehogs, a UK Priority Species, may use hedgerows and treelines for commuting and foraging. Winter clearance of these features may disturb hibernating individuals. Impermeable boundary fencing may restrict movement.

4.63 Clearance of hedgerows or treelines should be preceded by an ecological check. Garden fencing should incorporate Hedgehog highways for passage. Open excavations should follow the same precautionary approach as for badgers.

Invasive Species

4.64 Under Section 14 of the Wildlife and Countryside Act 1981 (as amended), it is an offence to plant or otherwise cause to grow in the wild any plant listed in Schedule 9 of the Act.

4.65 This legislation applies across England and Wales and is designed to prevent the spread of species that can outcompete native flora, alter habitats, and disrupt ecological processes.

Site Evaluation

4.66 Himalayan balsam is present on site and may spread during construction, particularly through movement of contaminated soil or plant material.

Mitigation and Enhancement Strategy

4.67 Contractors must be made aware of its presence and briefed on biosecurity measures. Soil from affected areas must not be removed or reused unless appropriately screened. Removal of invasive species should form part of the Site management strategy and be compliant with relevant legislation.

4.68 The emerging proposals provides an opportunity to include management and monitoring for invasive species that could have benefits for the local area by limiting the potential for such species to spread.

Summary

4.69 The post development plan shows how a significant area of semi-natural habitat in the west and north of the Site can be retained and enhanced, delivering ecological benefits. This area is contiguous with the riparian corridor associated with the River Otter. The proposals provide an ecologically enhanced buffer to the river corridor contributing to the protection and enhancement of this valuable receptor.

4.70 As shown in Plan ECO3, the Dormouse nest, Grass snake, and several Slow Worms were concentrated in the north-west of the site, particularly along the woodland edge and riparian corridor. While this does not exclude the presence of these species elsewhere on the site, the retention of this key habitat area is considered important.

4.71 Grassland and woodland edge enhancements, together with new tree / shrub planting will be of value to a range of protected species known from the local area, including bat species and Dormice, Otter and Beaver.

4.72 The establishment of a bat corridor will further enhance connectivity across the Site, which will also be of value for connectivity for Bats and Dormice.

4.73 The significant area available for ecological mitigation and enhancement, means that appropriate and proportionate ecological mitigation measures for faunal species can be effectively delivered within the Site. The post development plan shows the appropriate mitigation that can be designed into the development, including a significant area of green space to the north and west of the Site. The proposals present an opportunity to deliver a significant enhancement to local biodiversity, enhancing habitat quality and connectivity. Consequently, and from an ecological perspective, there are no issues that would preclude the proposed development on the Site, providing the outlined mitigation and enhancements in this report are implemented.

5. PLANNING POLICY

5.1 The emerging proposals must be considered in the context of both national planning policy and the local planning framework established by East Devon District Council (EDDC). These policies provide clear guidance for protecting biodiversity, ensuring sustainable development, and delivering measurable ecological enhancements.

National Planning Policy

5.2 The National Planning Policy Framework (NPPF) sets out the Government's requirements for the planning system and was first published on 27th March 2012. The most recent version was published on 12th December 2024 and amended in February 2025.

5.3 The key element of the NPPF is that there should be a presumption in favour of sustainable development (paragraphs 10 to 11). It is important to note this presumption 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 (paragraph 195).

5.4 Government policy is therefore clear that the presumption in favour of sustainable development applies where there is potential for an effect on a habitats site where it has been shown that there will be no adverse effect on such a site as a result of the Emerging proposals.

5.5 The NPPF also considers strategic approaches that Local Authorities should adopt with regard to the protection, maintenance and enhancement of green infrastructure, priority habitats and ecological networks together with the recovery of priority species.

5.6 The NPPF comprise a number of principles that Local Authorities should apply, including encouraging opportunities to incorporate biodiversity in and around developments and provision to refuse planning applications if significant harm cannot be avoided, mitigated or compensated.

5.7 Clarification is provided that the protection given to habitats sites is to be the same as that afforded to potential Special Protection Areas (SPAs), possible Special Areas of Conservation (SACs), listed or proposed Ramsar sites and

sites identified (or required) as compensatory measures for adverse effects on habitats sites.

5.8 Developments resulting in the loss or deterioration of 'irreplaceable' habitats are to be refused unless there are 'wholly exceptional reasons' (for instance, infrastructure projects where the public benefit would clearly outweigh the loss or deterioration of habitat) and a suitable compensation strategy exists.

5.9 National policy therefore implicitly recognises the importance of biodiversity and that with sensitive planning and design, development and conservation of the natural heritage can co-exist, and benefits can, in certain circumstances, be obtained.

Local Planning Policy

5.10 EDDC's current adopted Local Plan (2013–2031) includes several policies relevant to biodiversity and sustainable development:

i. Strategy 5 (Environment) – Seeks to conserve and enhance the natural environment, protect wildlife corridors and networks, and resist development that would result in loss or fragmentation of habitats.

ii. Strategy 47 (Nature Conservation and Geology) – Requires that development does not lead to the loss or degradation of important biodiversity or geological features, and that opportunities are taken to enhance biodiversity.

iii. EN5 (Wildlife Habitats and Features) – Supports the protection of habitats and species, both designated and undesignated, and highlights the need for biodiversity enhancements in new development.

5.11 While the adopted plan pre-dates mandatory BNG, it provides a foundation for ecological protection and enhancement, which is reinforced by recent legislative change.

Emerging East Devon Local Plan (2020–2040)

5.12 EDDC is currently progressing its emerging Local Plan 2020–2040, which seeks to build on the existing framework and align more closely with recent changes in national legislation. Draft policies are summarised below:

5.13 Policy 84 safeguards internationally and nationally designated wildlife sites, such as SACs, SPAs, SSSIs, and Ramsar sites. Development affecting these

sites must meet tests: no satisfactory alternative, overriding public benefit, and a minimum 20% biodiversity net gain (BNG).

5.14 Policy 85 protects irreplaceable habitats and features (e.g., ancient woodland, veteran trees, lowland fen), allowing development only under exceptional circumstances. Loss of important hedgerows is tightly controlled, with a preference for translocation over removal.

5.15 Policy 86 formalises the approach to Habitats Regulations Assessment (HRA), requiring appropriate mitigation for impacts on European sites such as the East Devon Pebblebed Heaths SAC/SPA and the River Axe SAC (with a requirement for nutrient neutrality). Residential development within 10 km of European sites must provide strategic mitigation.

5.16 Policy 87 sets a local minimum BNG target of 20%, exceeding the national 10% requirement. Off-site BNG must be delivered within East Devon unless clearly demonstrated to be unachievable.

5.17 Policy 88 supports the Local Nature Recovery Strategy (LNRS) and Nature Recovery Network (NRN). Development within mapped NRN areas will only be permitted where need is overriding and proposals deliver significant biodiversity gains beyond standard policy.

5.18 Policy 89 requires that an Ecological Assessment be submitted with applications, following CIEEM best practice. All survey work must be robust, seasonally appropriate, and not deferred by planning condition. The mitigation hierarchy and precautionary principle are to be applied in decision-making.

5.19 Policy 90 ensures that protected and notable species (including European Protected Species and Section 41 priority species) are fully considered, with the licensing tests met where required. Impacts on invasive species must also be addressed through appropriate management plans.

5.20 Policy 91 mandates inclusion of biodiversity enhancement features in all new development. This includes integrated bird and bat boxes, bat lofts, hedgehog highways, reptile hibernacula, and invertebrate bricks, tailored to the Site and designed with ecological input.

5.21 Policy 92 outlines commitments to tree protection and enhancement, including integration with the Devon Tree Strategy, tree retention, and increasing canopy

cover. Appropriate tree selection and management, including for ash dieback, is encouraged.

Discussion

5.22 Recommendations have been put forward in this report that would fully safeguard the existing ecological interest of the Site and, wherever possible, measures to enhance ecological and biodiversity value have been set out. Based on surveys undertaken and assessment, the presence and potential presence of protected species has been given due regard and measures to enhance the Site for such species have been put forward.

5.23 In conclusion, implementation of the measures set out in this report enable the proposals to fully accord with planning policy for ecology and nature conservation at all administrative levels. Moreover, the significant opportunities for ecological enhancement which arise as a result of the delivery of the community park and the corridors of enhanced habitat through and around the development itself, will deliver a net gain for biodiversity (as demonstrated within the BNG assessment undertaken) in line with national policy objectives.

6. CONCLUSIONS

6.1 The ecological assessment of land at Gerway Farm, Ottery St Mary, has identified a Site of generally low intrinsic ecological value, primarily comprising improved agricultural grassland. However, the Site and its immediate surroundings support a range of habitat features and species of conservation interest, including hedgerows, riparian woodland, and known presence of protected species such as Bats, Reptiles, Dormice.

6.2 The Site is not subject to any statutory ecological designations, although it lies within the consultation zone for the East Devon Pebblebed Heaths SAC/SPA. Appropriate mitigation measures, including strategic contributions and habitat management, can address potential indirect impacts.

6.3 The illustrative masterplan present a clear opportunity to deliver measurable ecological enhancements. These include the retention, creation and enhancement of boundary habitats, creation of species-rich grassland, construction of a SuDS feature and integration of ecological features such as a bat corridor to enhance the Site's overall connectivity. The Land Use Parameter Plan sufficiently accommodates the enhancements that will be brought forward at reserved matters.

6.4 Subject to the implementation of appropriate mitigation and enhancement measures outlined in this report, there are no overriding ecological constraints that would preclude development of the Site. The proposals are considered to be capable of delivering at least 10% biodiversity net gain on site, in line with national and local planning policy, including the Environment Act 2021.

7. REFERENCES

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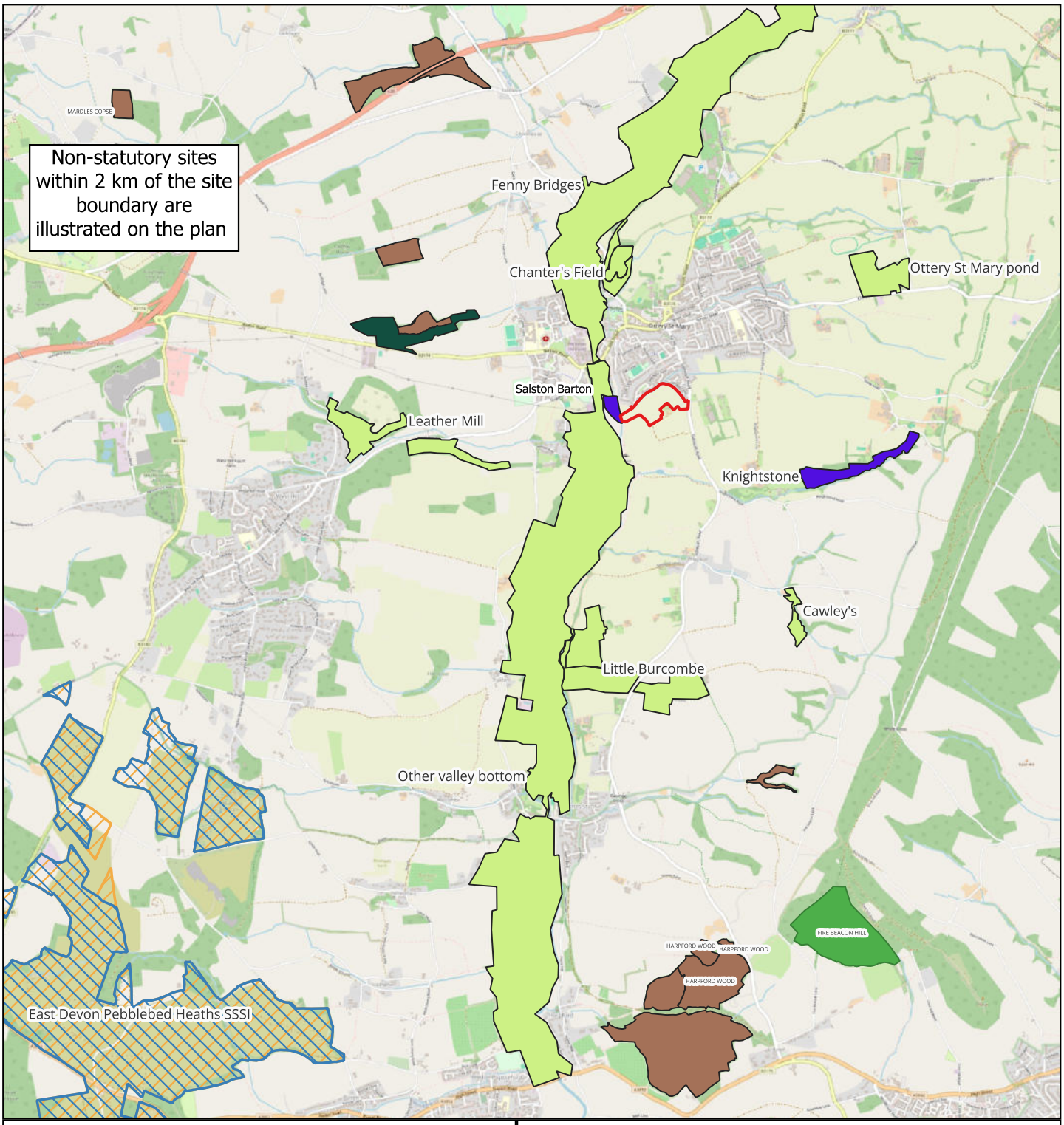
Plan ECO1

Site Location and Ecological Designations



QGIS Geographic Information System (Version 3.40.7). Open Source Geospatial Foundation Project. http://qgis.org Google. Otterly St Mary. Satellite map. Google Maps. Accessed June, 26th 2025

KEY

Site Boundary

BASELINE HABITATS

- County Widlife Site (CWS)
- Other Sites of Wildlife Interest (OSWI)
- Unconfirmed Wildlife Sites (UWS)
- Special Protection Areas England (SPA)
- Sites of Special Scientific Interest (SSSI)
- Ancient Woodland (AW)
- Local Nature Reserves (LNR)

0013 Gerway Farm, Ottery St Mary

Plan ECO1: Site Location and Ecological Designations

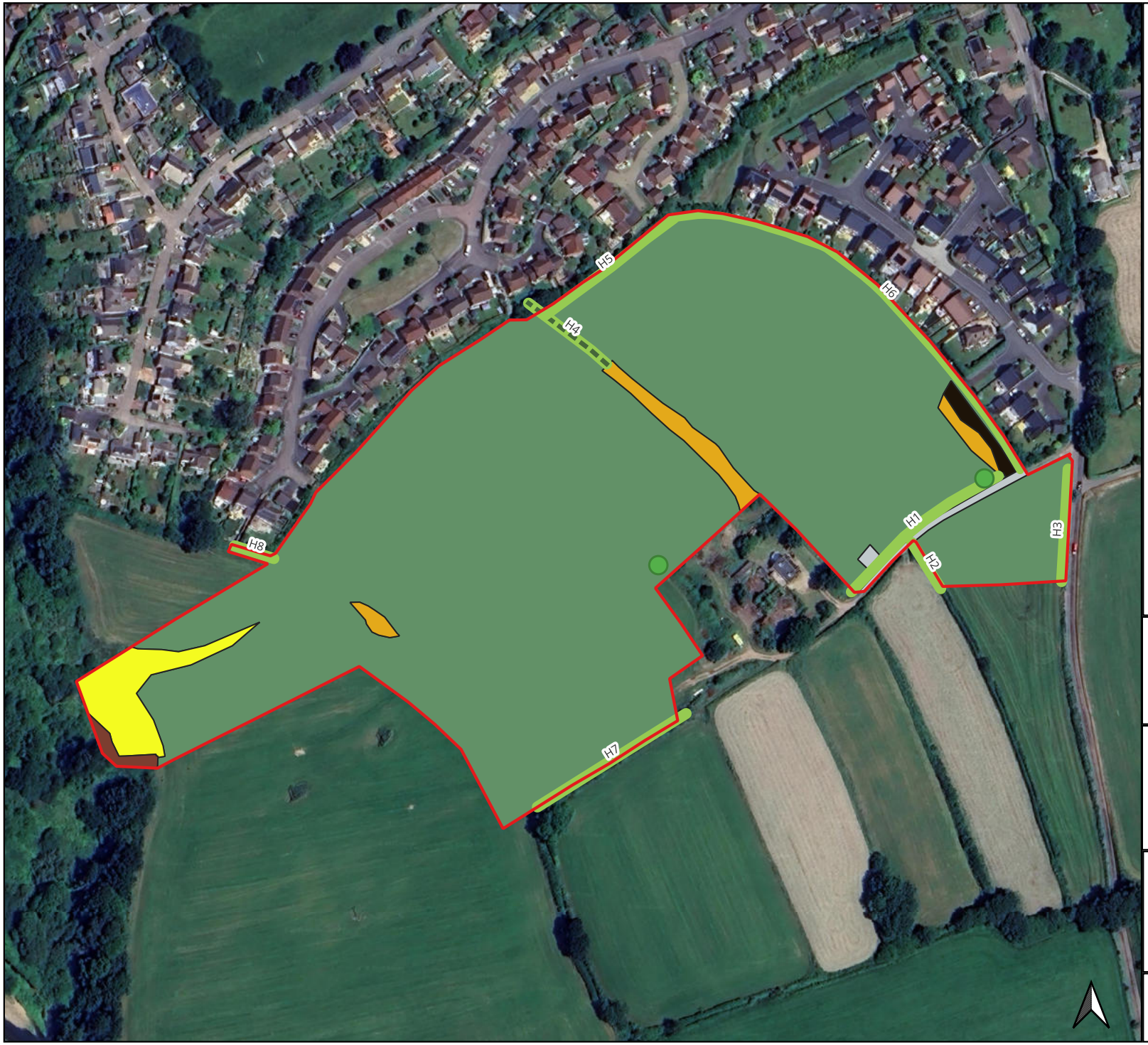
V1.1 26/06/25

BENNU ENVIRONMENTAL

Bennu Environmental Limited,
Carrant House, Teddington, Tewkesbury,
Gloucestershire, GL20 8NE

Plan ECO2

Ecological Features



KEY

Site Boundary

BASELINE HABITATS

Bare Ground

Building and Hardstanding

Rank Grassland

Vegetation

Woodland

Improved Grassland

Mature Trees

Hedgerows

Ecological Valuable Line Of Trees

0 50 100 150 m

0013 Gerway Farm, Ottery St Mary

Plan ECO2: Ecological Baseline

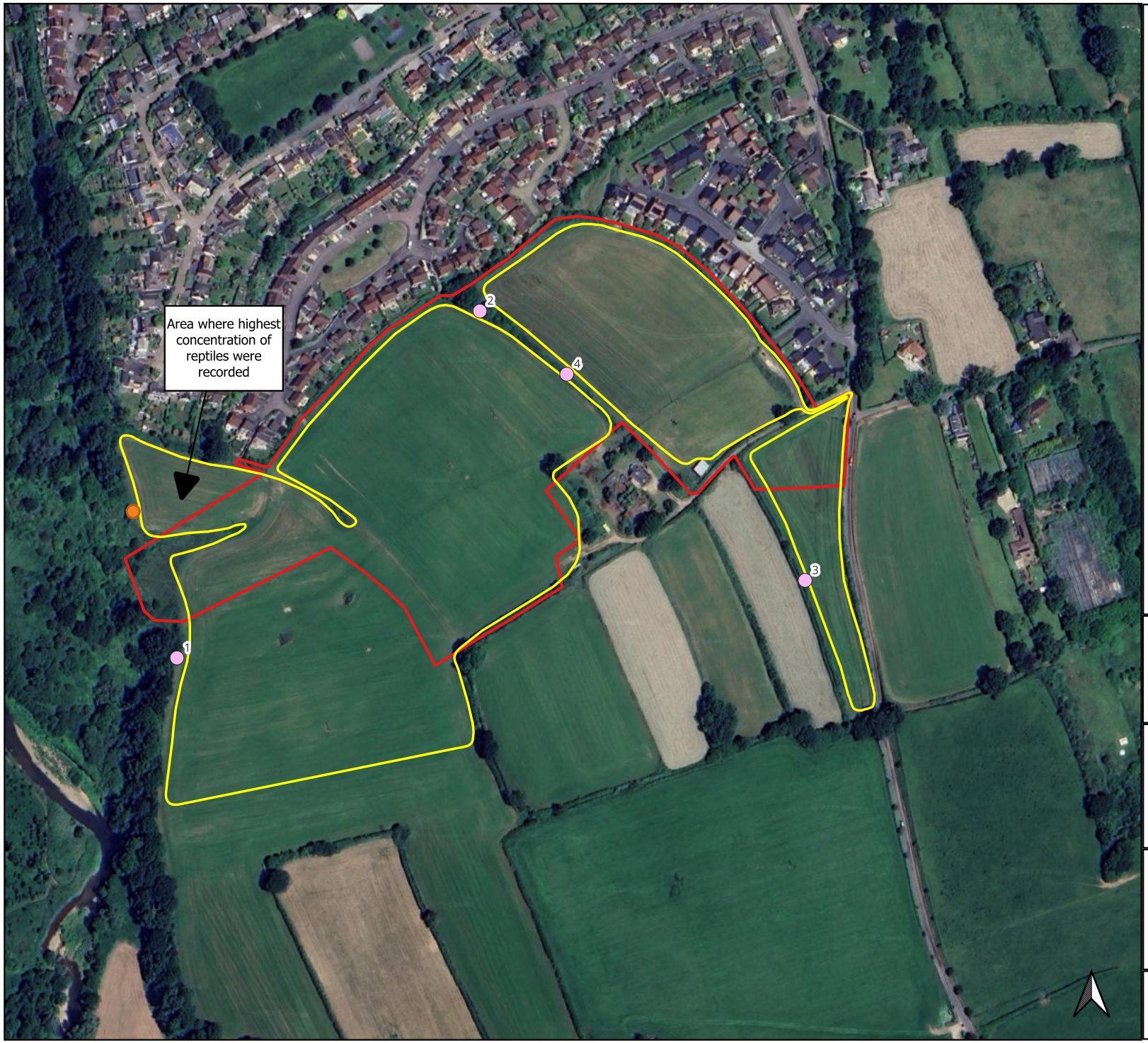
V1.2 21/11/2025

BENNU ENVIRONMENTAL

Bennu Environmental Limited,
Carrant House, Teddington, Tewkesbury,
Gloucestershire, GL20 8NE

Plan ECO3

Survey Results



KEY

- Site Boundary
- Dormouse nest
- Location of Bat Static Detectors
- Bat Transect

0 75 150 m

0013 Land at Gerway, Ottery St Mary

Plan ECO3: Survey Results

V1.1 09/10/2025

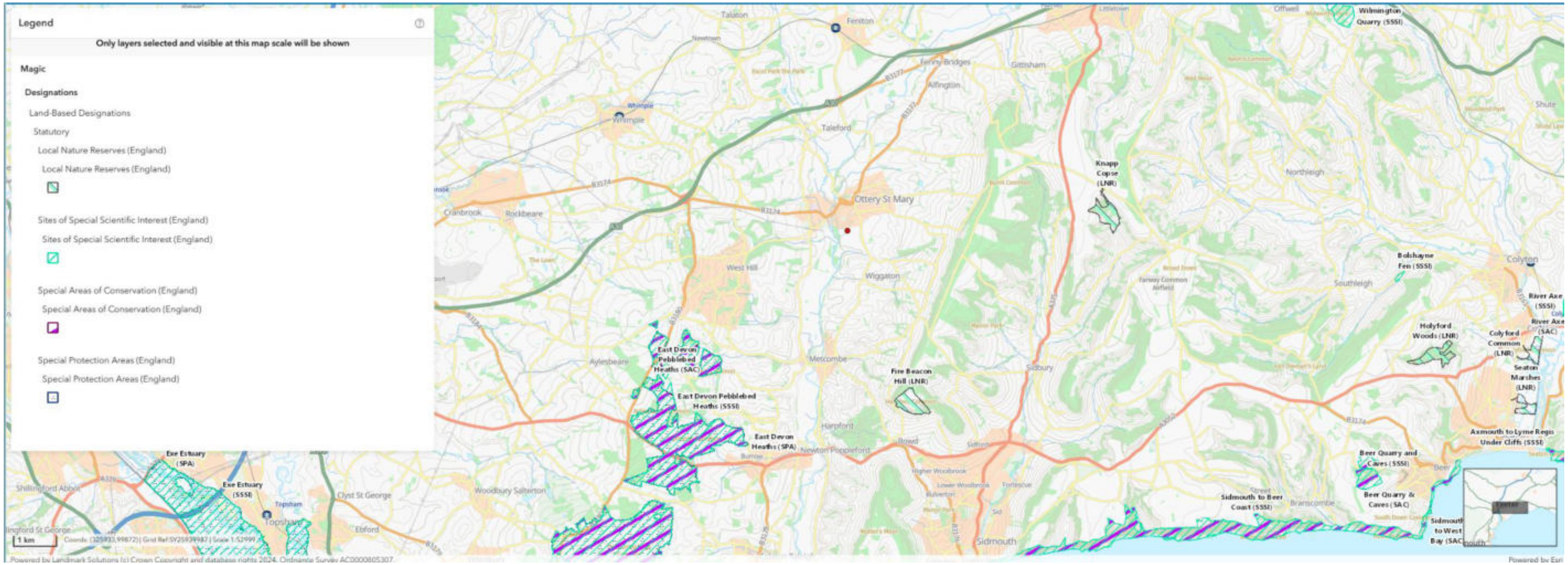
BENNU ENVIRONMENTAL

Bennu Environmental Limited,
Carrant House, Teddington, Tewkesbury,
Gloucestershire, GL20 8NE

Appendix 1

Information From MAGIC Regarding

Statutory Designated Sites



Legend
Only layers selected and visible at this map scale will be shown
Magic
Designations
Land-Based Designations
Statutory
Local Nature Reserves (England)
Local Nature Reserves (England)
Sites of Special Scientific Interest (England)
Sites of Special Scientific Interest (England)
Special Areas of Conservation (England)
Special Areas of Conservation (England)
Special Protection Areas (England)
Special Protection Areas (England)
Wilmington Quarry (SSSI)
Knapp Copse (LNR)
Bolshayne Fen (SSSI)
Holyford Woods (LNR)
Colyford Common (LNR)
River Axe (SSSI)
River Axe (SAC)
Seaton Marshes (LNR)
Axmouth to Lyme Regis Under Cliffs (SSSI)
Beer Quarry and Caves (SSSI)
Beer Quarry & Caves (SAC)
Sidmouth to Beer Coast (SSSI)
Sidmouth to West Bay (SAC)
Fire Beacon Hill (LNR)
East Devon Pebblebed Heaths (SAC)
East Devon Pebblebed Heaths (SSSI)
East Devon Heaths (SPA)
Exe Estuary (SPA)
Exe Estuary (SSSI)
Ottery St Mary
Feniton
Talaton
Whimple
Cranbrook
Rockbeare
West Hill
Wiggaton
Taleford
Fenny Bridges
Alfington
Gittisham
Northleigh
Southleigh
Colyton
Sidbury
Sidmouth
Metcombe
Harpford
Newton Poppleford
Aylesbeare
Woodbury Salterton
Clyst St George
Topsham
Ebford
Branscombe
Beer
Offwell
1 km
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Powered by Esri

Appendix 2

Bat Survey Data

Appendix 2: Bat Survey Results Tables

Static Detector Surveys

Table 1 Survey results from Location D1 20th May – 25th May

Location D1							
Species	**20/05/2025**	**21/05/2025**	**22/05/2025**	**23/05/2025**	**24/05/2025**	**25/05/2025**	**Grand Total**
Soprano pipistrelle	4261	1410	1052	3259	13079	4077	27138
Common pipistrelle	4541	3132	2899	4315	6765	3861	25513
Myotis spp.	109	189	210	151	908	1267	2834
Serotine	258	156	209	742	623	243	2220
Nathusius' pipistrelle	451	194	282	522	312	138	1899
Lesser horseshoe bat	12	0	0	31	462	57	562
Leisler's bat	36	22	57	118	218	95	546
Barbastelle	59	0	0	44	95	34	232
Noctule	9	21	0	15	23	39	107
Greater horseshoe bat	0	13	0	0	13	23	49
Daubenton's bat	0	26	15	0	0	0	41
Brown long-eared bat	0	0	0	0	40	0	40
Grey long-eared bat	16	0	0	0	0	0	16
Total	9752	5163	4724	9197	22538	9834	**61197**

Table 2 Survey results from Location D2 20th May – 25th May

Location D2							
Species	**20/05/2025**	**21/05/2025**	**22/05/2025**	**23/05/2025**	**24/05/2025**	**25/05/2025**	**Grand Total**
Common pipistrelle	10402	3284	4712	11013	17754	5455	52620
Soprano pipistrelle	2131	430	731	673	1026	1778	6769
Serotine	191	146	291	496	77	97	1298
Myotis spp.	39	173	65	98	157	58	590
Leisler's bat	26	68	55	59	139	20	367
Nathusius' pipistrelle	14	105	11	29	87	101	347
Brandt's bat	160	0	12	0	0	0	172
Barbastelle	24	12	64	0	0	0	100
Lesser horseshoe bat	0	0	0	0	30	45	75
Noctule	10	9	0	22	16	0	57
Grey long-eared bat	0	11	0	10	0	0	21
Brown long-eared bat	9	11	0	0	0	0	20
Alcathoe bat	0	0	14	0	0	0	14
Total	13006	4249	5955	12400	19286	7554	62450

Table 3 Survey results from Location D3 20th May – 25th May

Location D3							
Species	**20/05/2025**	**21/05/2025**	**22/05/2025**	**23/05/2025**	**24/05/2025**	**25/05/2025**	**Grand Total**
Soprano pipistrelle	3851	8495	9518	13099	10729	14445	60137
Common pipistrelle	4345	3383	6550	12025	11500	7623	45426
Serotine	165	837	604	648	420	325	2999
Barbastelle	10	217	36	576	204	118	1161
Myotis spp.	0	190	799	88	45	28	1150
Nathusius' pipistrelle	100	65	83	69	15	171	503
Leisler's bat	83	54	45	138	42	122	484
Lesser horseshoe bat	0	0	30	63	41	30	164
Noctule	0	27	0	10	32	0	69
Daubenton's bat	0	0	56	0	0	0	56
Grey long-eared bat	0	12	0	20	0	0	32
Brown long-eared bat	15	12	0	0	0	0	27
Total	8569	13292	17721	26736	23028	22862	**112208**

Table 4 Survey results from Location D1 12th June – 17th June

Location D1							
Species	**12/06/2025**	**13/06/2025**	**14/06/2025**	**15/06/2025**	**16/06/2025**	**17/06/2025**	**Grand Total**
Soprano pipistrelle	1041	4952	1831	12813	4607	7977	33221
Common pipistrelle	691	1437	890	3069	1889	2610	10586
Noctule	201	326	547	564	731	536	2905
Serotine	71	369	190	172	137	102	1041
Leisler's bat	11	24	0	0	10	0	45
Daubenton's bat	11	0	27	0	0	0	38
Whiskered bat	10	21	0	0	0	0	31
Lesser horseshoe bat	0	0	0	0	11	11	22
Barbastelle	0	0	0	0	17	0	17
Brandt's bat	14	0	0	0	0	0	14
Brown long-eared bat	0	0	0	0	13	0	13
Greater horseshoe bat	0	12	0	0	0	0	12
Grey long-eared bat	0	10	0	0	0	0	10
Total	2050	7151	3485	16618	7415	11236	**47955**

Table 5 Survey results from Location D2 11th June– 17th June

Location D2							
Species	**11/06/2025**	**12/06/2025**	**13/06/2025**	**14/06/2025**	**15/06/2025**	**16/06/2025**	**Grand Total**
Common pipistrelle	4615	2994	1355	2231	2374	2220	15789
Soprano pipistrelle	62	192	281	305	561	444	1845
Serotine	207	145	80	124	343	382	1281
Noctule	20	64	118	48	102	168	520
Lesser horseshoe bat	0	24	12	0	48	0	84
Leisler's bat	0	9	0	10	21	26	66
Daubenton's bat	0	0	0	11	0	12	23
Grey long-eared bat	0	0	0	0	0	21	21
Myotis spp.	0	12	0	0	0	0	12
Greater horseshoe bat	0	0	0	0	12	0	12
Whiskered bat	0	11	0	0	0	0	11
Nathusius' pipistrelle	0	0	0	0	10	0	10
Total	4904	3451	1846	2729	3471	3273	**19674**

Table 6 Survey results from Location D3 12th June – 17th June

Location D3							
Species	**12/06/2025**	**13/06/2025**	**14/06/2025**	**15/06/2025**	**16/06/2025**	**17/06/2025**	**Grand Total**
Soprano pipistrelle	234	474	278	467	414	342	2209
Common pipistrelle	240	608	52	271	385	233	1789
Lesser horseshoe bat	0	132	11	247	24	0	414
Noctule	20	58	89	96	78	26	367
Serotine	0	44	0	71	56	54	225
Barbastelle	0	21	0	45	14	14	94
Leisler's bat	0	0	31	46	10	0	87
Myotis spp.	0	15	0	41	0	25	81
Grey long-eared bat	0	10	0	0	14	0	24
Total	494	1377	461	1325	995	719	**5371**

Table 7 Survey results from Location D2 30th June – 7th July

Location D2									
Species	**30/06/2025**	**01/07/2025**	**02/07/2025**	**03/07/2025**	**04/07/2025**	**05/07/2025**	**06/07/2025**	**07/07/2025**	**Grand Total**
Common pipistrelle	4217	1606	2690	13851	7068	6619	5022	2728	43801
Soprano pipistrelle	763	694	754	1315	1452	841	1317	471	7607
Noctule	190	80	77	326	144	49	112	297	1275
Serotine	90	12	10	0	41	11	21	11	196
Myotis spp.	23	23	10	0	0	100	28	12	196
Brandt's bat	0	10	11	0	24	115	0	16	176
Leisler's bat	0	10	0	41	22	11	0	0	84
Greater horseshoe bat	0	0	13	14	24	0	11	11	73
Nathusius' pipistrelle	12	0	0	0	13	0	0	0	25
Daubenton's bat	0	0	0	0	0	10	0	14	24
Barbastelle	0	0	14	0	0	0	0	0	14
Lesser horseshoe bat	0	0	0	13	0	0	0	0	13
Total	5295	2435	3579	15560	8788	7756	6511	3560	**53484**

Table 8 Survey results from Location D3 1st July – 7th July

Location D3								
Species	**01/07/2025**	**02/07/2025**	**03/07/2025**	**04/07/2025**	**05/07/2025**	**06/07/2025**	**07/07/2025**	**Grand Total**
Soprano pipistrelle	2258	3870	4069	8081	2339	1330	2034	23981
Common pipistrelle	428	265	9363	2343	1152	128	207	13886
Noctule	158	149	68	128	127	9	35	674
Serotine	57	10	10	67	72	0	10	226
Myotis spp.	0	47	48	36	52	12	0	195
Grey long-eared bat	0	28	13	25	42	0	11	119
Daubenton's bat	0	23	0	11	23	0	13	70
Brown long-eared bat	0	27	0	24	0	0	0	51
Leisler's bat	12	0	0	0	30	0	0	42
Nathusius' pipistrelle	11	0	0	0	16	0	13	40
Barbastelle	0	0	0	0	14	0	0	14
Brandt's bat	0	14	0	0	0	0	0	14
Greater horseshoe bat	0	0	13	0	0	0	0	13
Lesser horseshoe bat	0	0	0	11	0	0	0	11
Whiskered bat	0	0	0	10	0	0	0	10
Nathusius' pipistrelle	0	0	0	10	0	0	0	10
Total	2924	4433	13584	10746	3867	1479	2323	**39356**

Table 9 Survey results from Location D1 17th July – 22nd July

Location D1							
Species	**17/07/2025**	**18/07/2025**	**19/07/2025**	**20/07/2025**	**21/07/2025**	**22/07/2025**	**Grand Total**
Common pipistrelle	8548	11907	4116	1639	21911	9026	57147
Soprano pipistrelle	1255	501	227	747	789	472	3991
Noctule	1046	96	0	10	283	72	1507
Leisler's bat	91	15	9	0	129	90	334
Serotine	100	80	36	31	36	35	318
Myotis spp.	33	74	19	53	32	100	311
Brown long-eared bat	0	25	0	10	0	0	35
Nathusius' pipistrelle	0	10	0	0	0	12	22
Lesser horseshoe bat	0	10	0	0	11	0	21
Whiskered bat	14	0	0	0	0	0	14
Greater horseshoe bat	0	0	0	0	0	14	14
Grey long-eared bat	12	0	0	0	0	0	12
Total	11099	12718	4407	2490	23191	9821	**63726**

Table 10 Survey results from Location D2 17th July – 22nd July

Location D2							
Species	**17/07/2025**	**18/07/2025**	**19/07/2025**	**20/07/2025**	**21/07/2025**	**22/07/2025**	**Grand Total**
Soprano pipistrelle	3759	8493	2008	2115	16341	8688	41404
Common pipistrelle	4804	6210	616	982	4774	5321	22707
Noctule	1434	1528	46	860	1146	1155	6169
Leisler's bat	566	420	20	45	595	297	1943
Serotine	63	142	0	18	352	269	844
Myotis spp.	74	48	15	58	416	142	753
Nathusius' pipistrelle	24	12	15	10	0	25	86
Greater horseshoe bat	20	0	15	0	0	15	50
Lesser horseshoe bat	0	13	0	0	0	10	23
Brown long-eared bat	0	0	0	12	0	0	12
Grey long-eared bat	0	0	0	12	0	0	12
Total	10744	16866	2735	4112	23624	15922	**74003**

Table 11 Survey results from Location D2 17th July – 22nd July

Location D3							
Species	**17/07/2025**	**18/07/2025**	**19/07/2025**	**20/07/2025**	**21/07/2025**	**22/07/2025**	**Grand Total**
Soprano pipistrelle	8627	4716	6977	2012	3582	1968	27882
Common pipistrelle	3715	2358	6768	407	1043	553	14844
Myotis spp.	263	260	0	69	0	70	662
Noctule	172	37	0	11	46	10	276
Serotine	71	16	9	19	98	59	272
Leisler's bat	0	0	0	32	15	29	76
Grey long-eared bat	0	10	0	0	0	26	36
Daubenton's bat	0	23	0	10	0	0	33
Greater horseshoe bat	31	0	0	0	0	0	31
Brown long-eared bat	0	11	0	11	0	0	22
Whiskered bat	0	0	11	0	0	0	11
Barbastelle	10	0	0	0	0	0	10
Lesser horseshoe bat	10	0	0	0	0	0	10
Total	12899	7431	13765	2571	4784	2715	**44165**

Table 12 Survey results from Location D1 31st July – 2nd August

Location D1				
Species	**31/07/2025**	**01/08/2025**	**02/08/2025**	**Grand Total**
Soprano pipistrelle	6940	4155	3433	14528
Common pipistrelle	2371	1675	2509	6555
Noctule	657	171	810	1638
Leisler's bat	23	104	261	388
Serotine	86	127	104	317
Myotis spp.	75	63	10	148
Lesser horseshoe bat	10	0	20	30
Greater horseshoe bat	28	0	0	28
Barbastelle	0	0	21	21
Daubenton's bat	16	0	0	16
Brown long-eared bat	0	13	0	13
Total	10206	6308	7168	**23682**

Table 13 Survey results from Location D2 31st July – 3rd August

Location D2					
Species	**31/07/2025**	**01/08/2025**	**02/08/2025**	**03/08/2025**	**Grand Total**
Common pipistrelle	9315	1666	12706	4020	27707
Soprano pipistrelle	417	137	847	161	1562
Noctule	0	81	165	117	363
Myotis spp.	187	36	80	11	314
Serotine	0	0	151	10	161
Leisler's bat	10	0	11	0	21
Brown long-eared bat	13	0	0	0	13
Barbastelle	0	0	12	0	12
Nathusius' pipistrelle	0	0	0	11	11
Lesser horseshoe bat	11	0	0	0	11
Total	9953	1920	13972	4330	**30175**

Table 14 Survey results from Location D3 31st July – 5th August

Location D3							
Species	**31/07/2025**	**01/08/2025**	**02/08/2025**	**03/08/2025**	**04/08/2025**	**05/08/2025**	**Grand Total**
Common pipistrelle	98	33	1969	296	111	18	2525
Soprano pipistrelle	528	9	669	675	36	180	2097
Serotine	42	20	104	72	88	130	456
Noctule	47	18	98	139	36	18	356
Myotis spp.	0	11	27	29	48	10	125
Leisler's bat	24	20	0	29	0	30	103
Barbastelle	0	12	0	0	0	0	12
Lesser horseshoe bat	0	0	11	0	0	0	11
Grey long-eared bat	0	0	0	10	0	0	10
Total	739	123	2878	1250	319	386	**5695**

Table 15 Survey results from Location D1 13th August – 19th August

Location D1								
Species	**13/08/2025**	**14/08/2025**	**15/08/2025**	**16/08/2025**	**17/08/2025**	**18/08/2025**	**19/08/2025**	**Grand Total**
Soprano pipistrelle	15073	4746	7886	2200	2640	3726	2507	38778
Common pipistrelle	4464	756	2484	1083	1952	1195	767	12701
Noctule	2041	710	1052	479	237	1219	419	6157
Serotine	65	44	71	58	67	27	27	359
Leisler's bat	35	11	64	14	20	66	0	210
Daubenton's bat	0	15	58	41	77	13	0	204
Barbastelle	34	35	14	30	49	0	0	162
Myotis spp.	22	42	36	17	9	32	0	158
Lesser horseshoe bat	0	14	39	29	0	0	11	93
Brown long-eared bat	0	10	47	0	0	0	0	57
Grey long-eared bat	13	0	0	15	10	0	0	38
Nathusius' pipistrelle	9	0	0	0	0	9	0	18
Total	21756	6383	11751	3966	5061	6287	3731	**58935**

Table 16 Survey results from Location D2 13th August – 19th August

Location D2						
Species	**13/08/2025**	**14/08/2025**	**15/08/2025**	**16/08/2025**	**17/08/2025**	**Grand Total**
Common pipistrelle	5572	2066	2512	6518	7532	24200
Soprano pipistrelle	955	492	598	655	413	3113
Noctule	240	149	230	131	72	822
Grey long-eared bat	79	10	62	25	39	215
Brown long-eared bat	53	8	26	75	28	190
Whiskered bat	30	0	31	78	30	169
Daubenton's bat	33	27	10	67	13	150
Serotine	28	39	42	20	18	147
Lesser horseshoe bat	0	26	20	11	0	57
Barbastelle	0	0	0	49	0	49
Natterer's bat	14	0	10	0	0	24
Leisler's bat	0	0	0	23	0	23
Greater horseshoe bat	0	0	0	17	0	17
Nathusius' pipistrelle	0	0	9	0	0	9
Total	7004	2817	3550	7669	8145	**29185**

Table 17 Survey results from Location D3 13th August – 19th August

Location D3									
Species	**13/08/2025**	**14/08/2025**	**15/08/2025**	**16/08/2025**	**17/08/2025**	**18/08/2025**	**19/08/2025**	**20/08/2025**	**Grand Total**
Soprano pipistrelle	553	195	564	281	303	438	306	53	2693
Common pipistrelle	484	144	386	476	361	124	282	20	2277
Noctule	192	66	246	59	52	201	102	45	963
Serotine	83	56	128	52	25	60	88	47	539
Leisler's bat	64	0	57	24	9	56	36	10	256
Myotis spp.	21	30	62	29	0	33	0	14	189
Daubenton's bat	0	36	10	16	0	22	14	0	98
Barbastelle	16	15	16	15	13	0	0	12	87
Brown long-eared bat	0	0	0	0	16	31	0	0	47
Greater horseshoe bat	0	10	0	26	0	0	0	0	36
Grey long-eared bat	0	12	12	0	0	0	0	11	35
Nathusius' pipistrelle	0	0	0	0	0	0	11	0	11
Lesser horseshoe bat	0	0	0	10	0	0	0	0	10
Total	1413	564	1481	988	779	965	839	212	**7241**

Table 18 Survey results from Location D1 2nd September – 8th September

Location D1								
Species	**02/09/2025**	**03/09/2025**	**04/09/2025**	**05/09/2025**	**06/09/2025**	**07/09/2025**	**08/09/2025**	**Grand Total**
Soprano pipistrelle	312	207	321	418	218	444	158	2078
Noctule	39	43	66	157	10	109	41	465
Common pipistrelle	89	64	12	133	47	18	11	374
Myotis spp.	8	2	5	6	5	9	7	42
Grey long-eared bat	3	0	15	4	0	3	6	31
Barbastelle	3	0	5	4	0	7	3	22
Serotine	2	1	0	4	7	2	1	17
Lesser horseshoe bat	2	0	1	6	0	0	2	11
Leisler's bat	0	0	0	4	2	2	0	8
Brown long-eared bat	2	0	1	1	0	3	0	7
Greater horseshoe bat	0	0	1	1	0	3	0	5
Daubenton's bat	0	0	0	1	0	0	3	4
Nathusius' pipistrelle	0	1	0	2	0	0	1	4
Brandt's bat	0	0	0	1	0	0	0	1
Total	460	318	427	742	289	600	233	3069

Table 19 Survey results from Location D2 2nd September – 6th September

Location D2						
Species	**02/09/2025**	**03/09/2025**	**04/09/2025**	**05/09/2025**	**06/09/2025**	**Grand Total**
Common pipistrelle	167	30	75	275	0	547
Soprano pipistrelle	71	8	195	108	0	382
Noctule	23	4	15	18	0	60
Lesser horseshoe bat	0	0	7	20	0	27
Myotis spp.	3	0	4	8	0	15
Barbastelle	0	0	1	6	0	7
Serotine	3	0	2	1	0	6
Grey long-eared bat	3	0	2	1	0	6
Leisler's bat	3	0	2	0	0	5
Daubenton's bat	1	0	2	1	0	4
Brandt's bat	0	0	1	2	0	3
Brown long-eared bat	0	0	2	0	0	2
Natterer's bat	0	0	0	1	0	1
Total	274	42	308	441	0	1065

Table 20 Survey results from Location D3 2nd September – 8th September

Location D3								
Species	**02/09/2025**	**03/09/2025**	**04/09/2025**	**05/09/2025**	**06/09/2025**	**07/09/2025**	**08/09/2025**	**Grand Total**
Soprano pipistrelle	20	27	4	50	9	22	5	137
Common pipistrelle	16	34	5	16	10	10	3	94
Barbastelle	26	20	4	0	1	4	0	55
Serotine	9	19	6	8	0	3	3	48
Noctule	9	7	4	17	0	7	2	46
Leisler's bat	2	2	3	0	1	5	1	14
Grey long-eared bat	0	0	4	0	0	0	2	6
Myotis spp.	2	1	1	1	0	0	0	5
Lesser horseshoe bat	1	1	1	1	0	0	0	4
Brown long-eared bat	0	0	1	0	0	0	2	3
Greater horseshoe bat	0	0	0	0	1	1	0	2
Daubenton's bat	1	1	0	0	0	0	0	2
Bechstein's bat	0	1	0	0	0	0	0	1
Natterer's bat	0	0	0	0	1	0	0	1
Total	86	113	33	93	23	52	18	418

Table 21 Survey results from Location D1 17th September – 22nd September

Location D1							
Species	**17/09/2025**	**18/09/2025**	**19/09/2025**	**20/09/2025**	**21/09/2025**	**22/09/2025**	**Grand Total**
Common pipistrelle	1268	667	896	175	42	63	3111
Soprano pipistrelle	536	336	346	40	57	53	1368
Noctule	10	38	4	3	2	1	58
Leisler's bat	18	11	1	0	0	1	31
Myotis spp.	2	1	1	6	4	0	14
Serotine	4	5	4	0	0	0	13
Brandt's bat	0	0	2	2	2	1	7
Lesser horseshoe bat	0	2	2	1	1	0	6
Barbastelle	0	0	0	2	3	0	5
Nathusius' pipistrelle	1	0	0	0	0	2	3
Brown long-eared bat	0	1	0	0	2	0	3
Grey long-eared bat	0	0	1	2	0	0	3
Natterer's bat	0	0	0	1	1	0	2
Greater horseshoe bat	0	0	1	1	0	0	2
Daubenton's bat	0	1	0	0	0	0	1
Whiskered bat	0	0	0	1	0	0	1
Total	1839	1062	1258	234	114	121	4628

Table 22 Survey results from Location D2 17th September – 22nd September

Location D2							
Species	**17/09/2025**	**18/09/2025**	**19/09/2025**	**20/09/2025**	**21/09/2025**	**22/09/2025**	**Grand Total**
Soprano pipistrelle	343	181	229	546	10	11	1320
Common pipistrelle	151	24	37	86	7	6	311
Myotis spp.	17	9	6	24	2	1	59
Noctule	13	12	17	1	8	0	51
Serotine	34	6	2	3	0	1	46
Lesser horseshoe bat	11	2	6	2	1	0	22
Leisler's bat	2	10	6	2	1	0	21
Daubenton's bat	6	3	1	1	2	2	15
Barbastelle	4	2	1	4	2	0	13
Grey long-eared bat	2	3	4	1	1	2	13
Brown long-eared bat	1	3	4	0	1	1	10
Brandt's bat	0	0	0	3	0	0	3
Natterer's bat	1	0	1	0	0	0	2
Nathusius' pipistrelle	0	0	0	0	0	1	1
Greater horseshoe bat	0	0	0	0	0	1	1
Total	585	255	314	673	35	26	1888

Table 23 Survey results from Location D3 17th September – 21st September

Location D3						
Species	**17/09/2025**	**18/09/2025**	**19/09/2025**	**20/09/2025**	**21/09/2025**	**Grand Total**
Soprano pipistrelle	1643	712	2399	785	122	5661
Common pipistrelle	903	1449	133	52	31	2568
Noctule	1	12	2	2	0	17
Lesser horseshoe bat	1	3	2	2	0	8
Barbastelle	0	0	0	5	0	5
Myotis spp.	0	0	1	4	0	5
Grey long-eared bat	0	0	0	5	0	5
Serotine	1	0	1	0	1	3
Daubenton's bat	1	1	0	1	0	3
Leisler's bat	2	0	0	1	0	3
Brown long-eared bat	1	0	0	2	0	3
Greater horseshoe bat	0	2	0	1	0	3
Total	2553	2179	2538	860	154	8284

Table 24 Survey results from Location D4 17th September – 22nd September

Location D4							
Species	**17/09/2025**	**18/09/2025**	**19/09/2025**	**20/09/2025**	**21/09/2025**	**22/09/2025**	**Grand Total**
Soprano pipistrelle	128	42	76	9	4	4	263
Common pipistrelle	124	42	47	1	5	2	221
Noctule	42	22	15	1	3	3	86
Nathusius' pipistrelle	42	22	15	1	3	3	86
Serotine	7	7	29	1	0	2	46
Barbastelle	6	1	0	0	0	1	8
Brown long-eared bat	2	3	1	1	0	1	8
Leisler's bat	2	2	0	0	0	1	5
Lesser horseshoe bat	1	2	2	0	0	0	5
Daubenton's bat	3	0	0	0	0	0	3
Grey long-eared bat	1	1	0	0	0	1	3
Whiskered bat	0	0	2	0	0	0	2
Natterer's bat	0	2	0	0	0	0	2
Greater horseshoe bat	1	1	0	0	0	0	2
Total	359	147	187	14	15	18	740

Table 25 Survey results from Location D1 7th September – 9th September

Location D1				
Species	**07/10/2025**	**08/10/2025**	**09/10/2025**	**Grand Total**
Barbastelle	3	0	13	16
Serotine	12	13	6	31
Common pipistrelle	38	52	272	362
Soprano pipistrelle	189	100	415	704
Myotis spp.	7	2	11	20
Noctule	4	3	2	9
Nathusius' pipistrelle	0	1	0	1
Brown long-eared bat	1	1	0	2
Lesser horseshoe bat	0	0	2	2
Total	254	172	721	1147

Table 26 Survey results from Location D2 7th September – 9th September

Location D2							
Species	**07/10/2025**	**08/10/2025**	**09/10/2025**	**10/10/2025**	**11/10/2025**	**12/10/2025**	**Grand Total**
Common pipistrelle	67	89	172	334	405	712	1779
Soprano pipistrelle	82	41	411	240	218	456	1448
Daubenton's bat	0	1	1	0	5	201	208
Whiskered bat	0	0	3	2	1	51	57
Noctule	3	0	1	4	1	1	10
Lesser horseshoe bat	0	0	1	1	2	5	9
Grey long-eared bat	3	2	0	3	0	0	8
Leisler's bat	0	1	1	1	4	0	7
Brown long-eared bat	3	1	2	1	0	0	7
Brandt's bat	0	0	0	2	1	3	6
Serotine	0	0	1	0	1	0	2
Nathusius' pipistrelle	0	0	1	0	0	1	2
Total	158	135	594	588	638	1430	3543

Table 27 Survey results from Location D3 7th September – 9th September

Location D3							
Species	**07/10/2025**	**08/10/2025**	**09/10/2025**	**10/10/2025**	**11/10/2025**	**12/10/2025**	**Grand Total**
Common pipistrelle	6	4	17	17	7	3	54
Soprano pipistrelle	2	1	5	12	7	4	31
Brown long-eared bat	0	1	1	3	1	1	7
Noctule	0	2	1	1	1	1	6
Serotine	0	1	1	1	0	0	3
Myotis	0	1	0	1	1	0	3
Leisler's bat	0	0	0	0	1	0	1
Total	8	10	25	35	18	9	105

Summary Tables

Table 28. Summary table of Bat Registrations per Detector each Survey

Static location	20.05.25	12.06.25	30.06.25	17.07.25	31.07.25	13.08.25	02/09.25	17.09.25	07.10.25	Grand total
D1	61197	47955	x	63726	23682	58935	3069	4628	1147	264339
D2	62450	19674	53484	74003	30175	29185	1065	1888	3543	275467
D3	112208	5371	39356	44165	5695	7241	418	8284	105	222843
Total	235855	73000	92840	181894	59552	95361	4552	14800	4795	762649

Table 29 Summary of Bat Species Recorded per Survey

Species	May 20th–25th	*June 12th – 17th*	*June 30th to 7th July*	*July 17th – 22nd*	*31st July – 5th August*	August *13th – 20th*	September *2nd – 8th*	September *17th – 22nd*	October *7th - 12th*	Grand total	%
Common pipistrelle	123559	28164	57687	94698	36787	39178	1015	5990	2195	389273	50.99 %
Soprano pipistrelle	94044	37275	31588	73277	18187	44584	2597	7039	2183	310774	40.71 %
Noctule	233	3792	1949	7952	2357	7942	571	2677	25	27498	3.60%
Serotine	6517	2547	422	1434	934	1045	71	62	36	13068	1.71%
Myotis spp.	4574	93	391	1726	587	347	62	78	23	7881	1.03%
Leisler's bat	1397	198	126	2353	512	489	27	55	8	5165	0.68%
Nathusius' pipistrelle	2749	10	65	108	11	38	4	4	3	2992	0.39%
Barbastelle	1493	59	28	10	45	298	84	23	16	2056	0.27%
Lesser horseshoe bat	801	520	24	54	52	160	42	36	11	1700	0.22%
Daubenton's bat	41	61	94	33	16	452	10	19	208	934	0.12%
Grey long-eared bat	69	55	119	60	10	288	12	21	8	642	0.08%
Brown long-eared bat	87	13	51	69	26	294	12	16	16	584	0.08%
Brandt's bat	172	14	190	x	x	x	x	x	6	382	0.05%
Greater horseshoe bat	49	24	86	95	28	53	7	6		348	0.05%
Whiskered bat	x	x	10	25	x	x	x	x	x	35	< 0.01%
Natterer's bat	x	x	x	x	x	24	2	4	x	30	< 0.01%
Alcathoe bat	14	x	x	x	x	x	x	x	x	14	< 0.01%
Grand Total	235799	72825	92830	181894	59552	95192	4516	16030	4738	763376	

Table 30

Species	20/05/2025
Common pipistrelle	80
Soprano pipistrelle	71
Serotine	31
Leisler's bat	28
Noctule	19
Nathusius' pipistrelle	1
Brown long-eared bat	1
Grand total	231

Table 31

Species	12/06/2025
Common pipistrelle	149
Soprano pipistrelle	117
Serotine	37
Noctule	5
Daubenton's bat	1
Leisler's bat	1
Nathusius' pipistrelle	1
Brown long-eared bat	1
Total	312

Table 32

Species	01/07/2025
Noctule	95
Soprano pipistrelle	83
Common pipistrelle	82
Leisler's bat	10
Serotine	4
Nathusius' pipistrelle	2
Total	276

Table 33

Species	17/07/2025
Common pipistrelle	96
Soprano pipistrelle	67
Noctule	34
Serotine	6
Barbastelle	3
Nathusius' pipistrelle	1
Total	207

Table 34

Species	31/07/2025
Common pipistrelle	73
Soprano pipistrelle	40
Noctule	2
Serotine	1
Whiskered bat	1
Leisler's bat	1
Nathusius' pipistrelle	1
Total	119

Table 35

Species	13/08/2025
Common pipistrelle	49
Soprano pipistrelle	39
Noctule	4
Myotis spp.	3
Serotine	1
Leisler's bat	1
Nathusius' pipistrelle	1
Total	98

Table 36

Species	02/09/2025
Soprano pipistrelle	82
Noctule	49
Common pipistrelle	38
Leisler's bat	4
Brown long-eared bat	3
Serotine	3
Myotis spp.	2
Daubenton's bat	1
Natterer's bat	1
Total	186

Table 37

Species	17/09/2025
Common pipistrelle	115
Soprano pipistrelle	94
Noctule	11
Brown long-eared bat	6
Serotine	4
Leisler's bat	4
Whiskered bat	1
Grey long-eared bat	1
Total	236

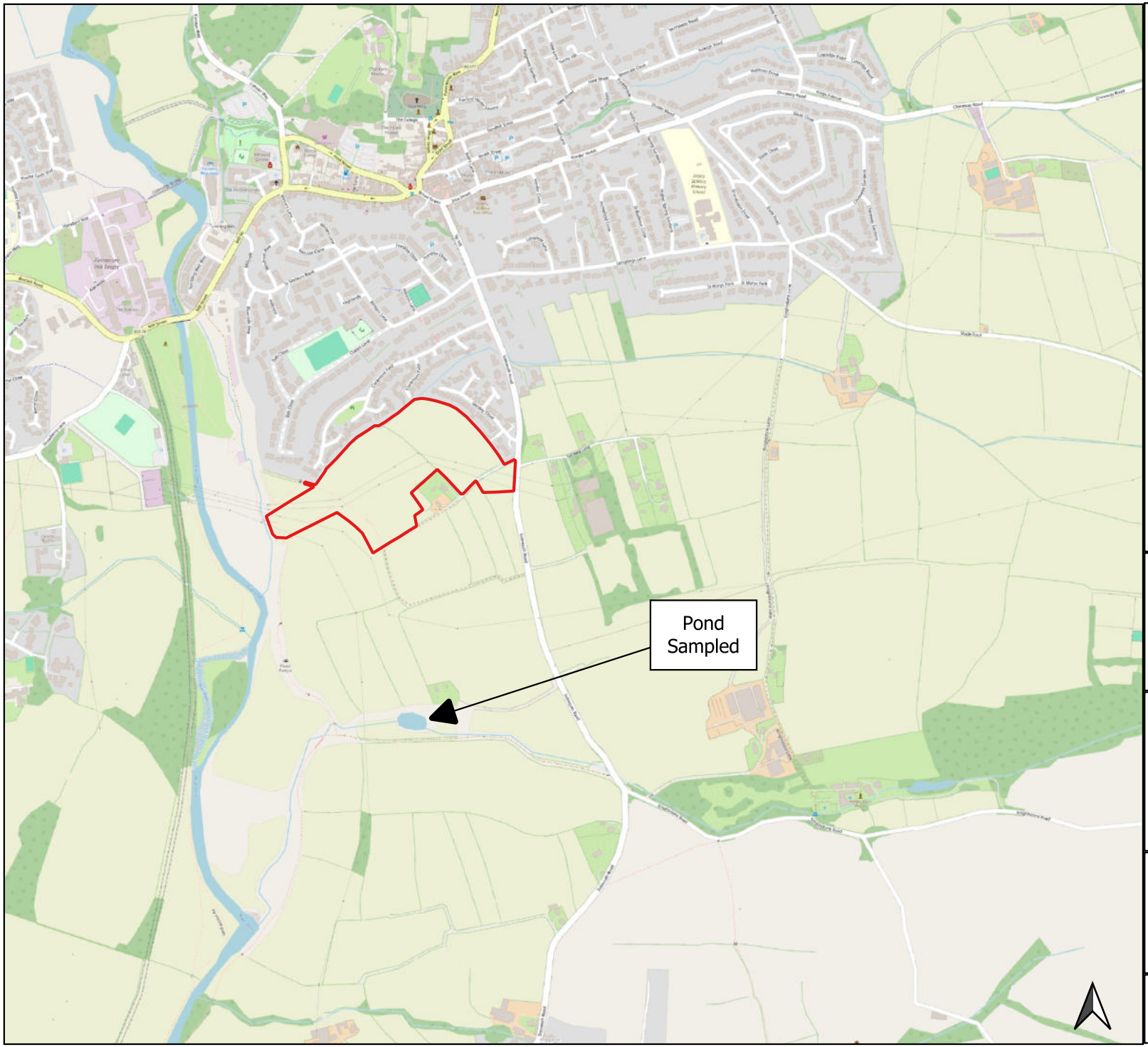
Table 38

Species	07/10/2025
Soprano pipistrelle	114
Common pipistrelle	29
Noctule	1
Brown long-eared bat	1
Total	145

Appendix 3

Location of Pond Sampled for

Great Crested Newts



KEY

Site Boundary

0 100 200 300 400 500 m

0013 Land at Gerway, Ottery St Mary

APPENDIX 3: Location of pond sampled for Great Crested Newts (GCN)

V1.1 09/10/2025

BENNU ENVIRONMENTAL

Bennu Environmental Limited,
Carrant House, Teddington, Tewkesbury,
Gloucestershire, GL20 8NE

Appendix 4

Biodiversity Net Gain Assessment

BENNU ENVIRONMENTAL

Carrant House · Teddington · Tewkesbury · Gloucestershire · GL20 8NE
www.bennuenvironmental.com info@bennuenvironmental.com

0013 – Land at Gerway Farm

Biodiversity Net Gain Assessment

27.11.2025

1. Introduction

1.1. Bennu Environmental was instructed to undertake a Biodiversity Net Gain (BNG) assessment of Land at Gerway Farm, Ottery St Mary, Devon, (hereafter referred to as the 'site').

1.2. This briefing note has been produced in support of the completion of a statutory BNG metric for the site and illustrative proposals. This note outlines the methodology employed, sets out the site's baseline habitats and their current condition, an assessment of the effects for the proposed development, and provides advice on achieving the proposed Biodiversity Net Gain.

2. Biodiversity Metric Methodology

2.1. In line with UK legislation and national planning policy, all new developments are expected to provide a Biodiversity Net Gain under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Developers must deliver a BNG of 10%, with this being measured using the latest recognised Defra metric.

2.2. The latest BNG metric (statutory version 1.0.3) released on 23 July 2024 by Natural England has been utilised for this assessment. The metric characterises habitats using the UK Habitat (UKHab) classification system. This information, as well as the size of each habitat parcel, its condition (determined based on Condition Assessment Sheets and Methodology, version 1.0.2, released on 3 July 2025) and other factors such as the site's strategic significance have been used to quantify the sites biodiversity value.

2.3. The site was surveyed in May 2025 and October 2025 during which the relevant information was collected to inform the assessment. Measurements for on-site habitats and pre-development were calculated using spatial data analysed in QGIS.

2.4. Measurements for post-development habitats are based primarily on the Land Use Parameter Plan by The Richards Partnership (plan reference: 24-54-PL-204 Rev: B).

2.5. In addition, given the outline nature of the proposals it has been necessary to make reasonable assumptions based on what is considered likely to be delivered as part of the development. Where necessary a precautionary approach has been made to the type and condition of habitats that could be provided as part of the proposals and where necessary justification has been provided.

3. Baseline

3.1. The site predominantly comprises several fields of improved grassland. Additional habitats present include a section of other neutral grassland to the west, areas of tall forb vegetation, bare ground, a woodland edge and developed land (consisting of hardstanding and a livestock shed). The location of these is presented on Plan BNG1 of this report.

3.2. Utilising the BNG Metric it has been established that the site has a baseline value of 15.39 habitat units and 1.80 hedgerow units. A summary of this is shown below at Figure 1.

On-site baseline	*Habitat units*	15.39
	Hedgerow units	1.80
	Watercourse units	0.00

Figure 1 - Summary of onsite baseline BNG value

3.3. More detail is provided in Table 1 and Table 2 below regarding the composition of habitats and the number of baseline units delivered by each.

Habitat	Area (Ha)	Condition	Units
Modified Grassland	6.715	Poor	13.43
Developed Land	0.038	No condition assessment required	0.00

Bare Ground	0.034	Good	0.20
Woodland	0.026	Good	0.36
Other Neutral Grassland	0.185	Poor	0.74
Tall Forbs	0.131	Poor	0.26
Urban Tree	0.0326	Good	0.39

Table 1- Units delivered by baseline habitats

Habitat	Length (Km)	Condition	Units
H1 Species-rich native hedgerow - associated with bank or ditch	0.096	Poor	0.58
H2 Species-rich native hedgerow	0.028	Poor	0.11
H3 Species-rich native hedgerow	0.006	Poor	0.02
H4 Ecologically valuable line of trees	0.05	Poor	0.20
H5 Native hedgerow	0.08	Poor	0.16
H6 Native hedgerow	0.231	Poor	0.46
H7 Native hedgerow	0.089	Poor	0.18
H8 Species-rich native hedgerow	0.021	Poor	0.08

Table 2 - Units delivered by baseline hedgerows and Treeline

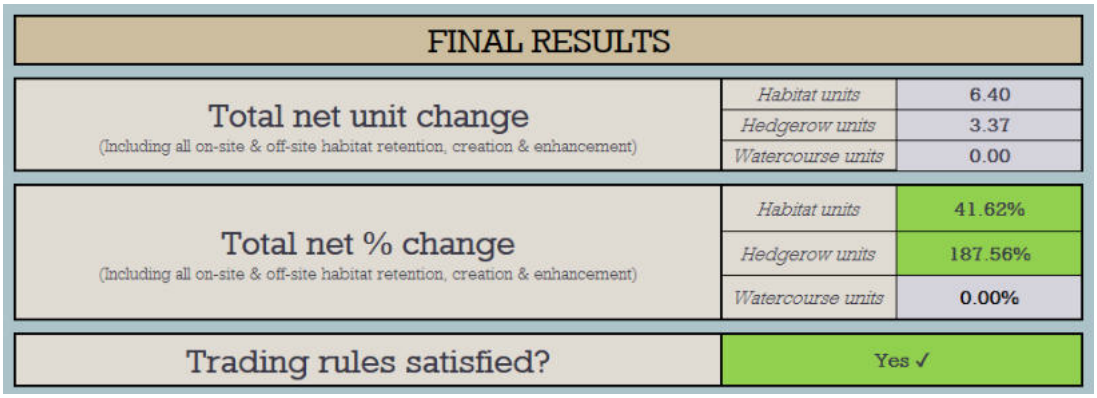
3.4. None of the habitats within the site baseline constitute irreplaceable habitats. The woodland to the west of the site is considered to be a Habitat of Principle Importance, although this small section within the Site is to be retained in full.

4. Post-Development

4.1. The post-development scenario is based primarily on the Land Use Parameters Plan with reasonable assumptions made on the type and condition of habitats that can be delivered as part of the proposals. These are detailed further below.

4.2. Table 3, Table 4, and Table 5 below summarise the habitats and hedgerows that are to be created and enhanced on-site post-development and are illustrated on Plan BNG2 in Annex 2.

4.3. The BNG Metric generates a post-development habitat score of up to 41.62%, which well exceeds the required 10% net gain. The hedgerow units far exceed the 10% with a 187.56% net ~~change~~increase. It should also be noted that these scores are based on precautionary assumptions, and ~~it is expected that the site can deliver greater net gains,~~ subject to detailed designs, this figure could vary, however a minimum of 10% BNG for habitats and hedgerows is notably exceeded.~~.~~



FINAL RESULTS		
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	6.40
	Hedgerow units	3.37
	Watercourse units	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	41.62%
	Hedgerow units	187.56%
	Watercourse units	0.00%
Trading rules satisfied?	Yes ✓	

Figure 2 - Onsite post-development BNG values

4.4. The proposed habitats include the creation of a drainage basin/s along the northern part of the site, with the remaining adjacent habitat used to create further greenspace. This area provides a large open space for grassland creation as well as space for tree and scattered scrub planting. The development site will also allow for the creation of new native boundary hedgerows as well as the enhancement of those existing onsite. These have been mapped on Plan BNG2.

4.5. The target conditions for proposed habitats have been set at reasonable and precautionary levels based on the available information of the post-development scenario. Taking a precautionary position, it is considered that these thresholds can be achieved through appropriate management undertaken during the operational phase of the proposals. Indeed, it is considered that these predicted conditions can, in most instances be exceeded, subject to detailed design. Further detail on how criteria can be met is provided below and within Annex 1.

Habitat	Area (Ha)	Condition	Units
Sustainable Drainage System	1.166	Good	3.92
Developed Land	2.644	No condition assessment required	0.00
Vegetated Garden	1.133	No condition assessment required	2.19
Urban Tree	0.352	Moderate	1.08

Table 3 Proposed created habitats

Baseline Habitat	Proposed habitat / enhanced habitat	Area (Ha)	Condition	Units
Modified Grassland	Other Neutral Grassland	1.974	Poor - Moderate	12.24
Other Neutral Grassland	Other Neutral Grassland	0.185	Poor - Good	1.61

Table 4 Proposed enhancement to baseline habitats

Habitat	Length (Km)	Condition	Units
Native hedgerow 1	0.10	Moderate	0.33
Native hedgerow 2	0.25	Moderate	0.82
Native hedgerow 3	0.08	Moderate	0.26
Native hedgerow 4	0.09	Moderate	0.30
Native hedgerow 5	0.128	Moderate	0.43

Table 5 Proposed linear habitats

4.6. In respect of existing hedgerows onsite, it should be noted that only those hedgerows to be located within the public realm have been included for enhancement as part of the BNG strategy. All other hedgerows, where not located in the public realm, have been included as retained hedgerows only.

Sustainable Drainage System (SuDS) creation

4.7. The existing metric includes the construction of drainage basins as part of the blue infrastructure. As shown in Table 3, the condition has been assigned a target condition of ‘Good’. To achieve this, three core criteria must be met: the vegetation structure should be varied, it must support a diverse range of plant species beneficial

to wildlife, and invasive or non-native species must be absent. Additionally, the plant species should be predominantly native and appropriate for wetland or riparian environments. These requirements are considered relatively straightforward to meet noting the size of the proposed drainage features and their location within wider green open space that will be enhanced for biodiversity benefits. Therefore, the condition to 'Good' is considered achievable within the metric.

4.8. Indeed, because of the size and location of the proposed drainage basins within wider green infrastructure, it is considered that the basins could form part of wider provisions of better quality grassland and be included as Other Neutral Grassland. On this basis, the proposed BNG value would be significantly greater and as the design develops it may be possible to demonstrate how this will be delivered. However, on a precautionary basis, at this stage the basins are included as SuDS features within the metric.

Grassland enhancement

4.9. Wherever possible, the greenspace around the development should be enhanced through over sowing with suitable native species-rich grassland mixes. This aligns with the BNG principle of seeking to retain or enhance existing features in the first instance.

4.10. Areas of existing Modified Grassland are proposed to be enhanced to Other Neutral Grassland. This can be achieved through over-seeding with a native meadow grassland seed mix and appropriate management aimed at ensuring a varied sward, implementation of a sensitive cutting regime and monitoring of invasive / pernicious species.

4.11. It is also anticipated that features such as cycleways, play areas and footpaths will be set within the informal green space. In light of this mixed use, the condition within the metric has been set to 'Moderate'. This is a precautionary approach to reflect the possible variability in how the open space will be delivered and used. However, it is expected that the majority of the Other Neutral Grassland can be delivered into Good condition, subject to detailed design. Indeed, it is reasonable to anticipate an increase in habitat units as part of final scheme.

4.12. The existing Other Neutral Grassland has been assessed to be in ‘Poor’ condition. Based on the condition criteria, opportunities to enhance the condition to ‘Good’ appears relatively simple with good management noting the location of the grassland in the west of the site and that it will form part of wider grassland enhancements.

Hedgerows

4.13. To achieve net gain for hedgerow units five new native hedgerows have been included within the metric, as well as enhancements to some of existing hedgerows. The locations of these and the hedgerows to be enhanced are shown on Plan BNG2.

4.14. All the existing hedgerows were assigned a baseline condition of ‘Poor’ due to them all failing both criteria within the functional group related to ground disturbance and nutrient enrichment. The newly planted hedgerows and enhancement conditions have been set to ‘Moderate’. In view of the condition criteria, this provides a reasonable precautionary assessment and accounts for any variability in management that may be required. The enhancements are considered likely to achieve ‘Good’ condition, but a precautionary approach has been taken to give confidence that a net gain can be delivered.

Urban Tree

4.15. A total of 86 trees has been proposed as part of the metric. The locations of the indicative tree planting is shown of Plan BNG2 and is based on the Illustrative Master Plan (Drawing Number 24-54-PL-203, dated 05.09.2025) produced by The Richards Partnership. This is an approximate number and may be subject to change, but as a precautionary measure the number of trees included within the metric is less than that shown on the Illustrative Masterplan with street trees within the development footprint not included. The in-built Tree Helper Tool was used in the metric, with the 86 trees corresponding to a total area of 0.35 hectares.

4.16. The condition of the trees has been set to ‘Moderate’. Based on the condition criteria this is considered a realistic and achievable condition. Key criteria include native species, understory vegetation, tree health, and maturity. Newly planted trees will require several years to establish and meet all condition requirements. However, through appropriate management reaching ‘Moderate’ condition is considered relatively simple.

5. Conclusion

5.1. The existing baseline conditions of the site can, through proposed enhancements and new planting, achieve a ~~a~~ minimum of 10% Biodiversity Net Gain as part of the development. A precautionary approach has been taken in assigning habitat type and condition to new habitats and ensures that potential mitigation measures are appropriately reflected in the metric. Indeed, the final BNG score has the potential to further increase once further details of the proposals are developed at the detailed stage.

Annex 1

Condition Assessment Criteria and Proposed Management Measures

Other Neutral Grassland

Criterion	Target description	Management actions
A	The parcel represents a good example of its habitat type, with a consistently high proportion of characteristic indicator species present relevant to the specific habitat type (and relative to Footnote 3 suboptimal species which may be listed in the UKHab description). **Note - this criterion is essential for achieving Moderate or Good condition for non-acid grassland types only.**	Through appropriate preparation of the ground, followed by the use of suitable species-rich seed mix it can be ensured that a floristically diverse grassland parcel can be delivered with a high proportion of the desired indicator species
B	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for insects, birds and small mammals to live and breed.	Management can be implemented to ensure that a varied sward height is delivered across the habitat parcel
C	Cover of bare ground is between 1% and 5%, including localised areas, for example, rabbit warrens.	Supplementary planting can be implemented to infill any areas of large areas of bare ground which develop, and also to respond to pressures such as footfall and ensure protection of the grassland
D	Cover of bracken *Pteridium aquilinum* is less than 20% and cover of scrub (including bramble *Rubus fruticosus* agg.) is less than 5%.	Monitoring can ensure that Bracken and scrub are not allowed to become established within the grassland
E	Combined cover of species indicative of suboptimal condition and physical damage (such as excessive poaching, damage from machinery use 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.	As above, monitoring can ensure that species-indicative of suboptimal condition and non-native species are not permitted to become established. Management can respond to any sources of physical damage and exclude the source of such disturbance.
F	There are 10 or more vascular plant species per m^2 present, including forbs that are characteristic of the habitat type (species referenced in Footnote 3 and 5 cannot contribute towards this count). **Note - this criterion is essential for achieving Good condition for non-acid grassland types only.**	An appropriate species-rich seed mix, coupled with monitoring and management which will ensure that a diverse sward is maintained, with no species becoming overly dominant across the parcel

Hedgerows

Criterion	Target description	Management actions
A1	>1.5 m average along length	Allow regrowth, coppice where necessary and avoid over trimming.
A2	>1.5 m average along length	Same management as above.
B1	Gap between ground and base of canopy <0.5 m for >90% of length	Gaps should be infilled by planting native species and encouraging natural regeneration.
B2	"Gaps make up <10% of total length; and No canopy gaps >5 m"	Same management as above.
C1	">1 m width of undisturbed ground with perennial herbaceous vegetation for >90% of length: · Measured from outer edge of hedgerow; and · Is present on one side of the hedgerow (at least).	Maintain an undisturbed buffer along the side of the hedgerow.
C2	Plant species indicative of nutrient enrichment of soils dominate <20% cover of the area of undisturbed ground.	Reduce nutrient inputs near hedgerows, avoiding fertilisers and control species where appropriate.
D1	>90% of the hedgerow and undisturbed ground is free of invasive non-native plant species (including those listed on Schedule 9 of WCA3) and recently introduced species.	Use appropriate measurements to control non-native species to prevent establishment.
D2	>90% of the hedgerow or undisturbed ground is free of damage caused by human activities.	Management can respond to any sources of physical damage and exclude the source of such disturbance

Urban tree

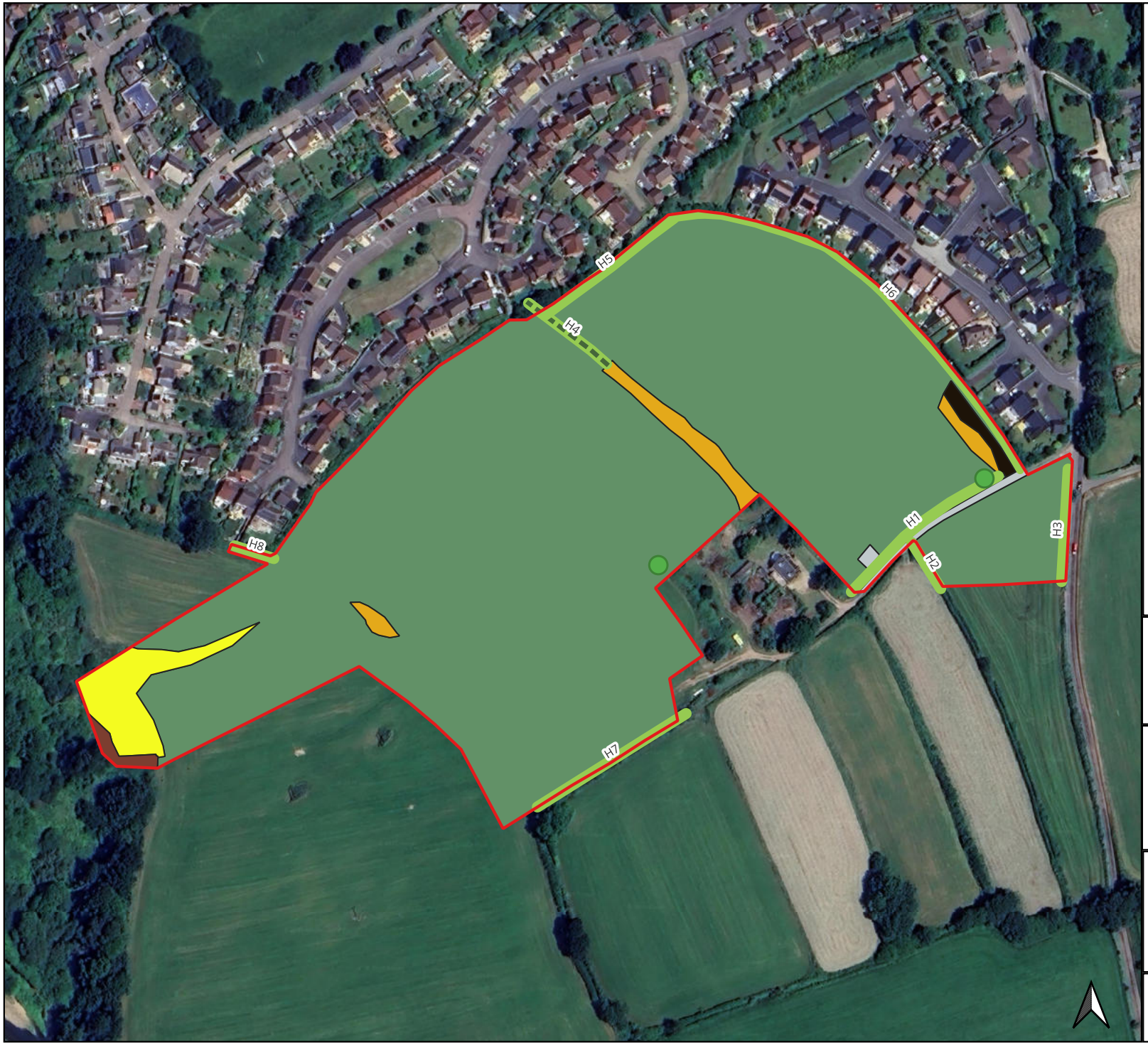
Criterion	Target description	Management actions
A	The tree is a native species (or at least 70% within the block are native species).	Ensure that trees planted are predominantly native tree species.
B	The tree canopy is predominantly continuous, with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide (individual trees automatically pass this criterion).	Encourage natural regeneration, limit pruning to maintain continuous canopy.
C	The tree is mature (or more than 50% within the block are mature)[1].	Newly planted tree will require several years of establishment before meeting this criterion.
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.	Use appropriate management to restrict harmful human activity and avoid unnecessary pruning.
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	Retain deadwood, broken branches and ivy to support wildlife.
F	More than 20% of the tree canopy area is oversailing vegetation beneath.	Encourage understory growth by planting native scrub.

SuDS

Criterion	Target Description	Management Actions
A	The SuDS feature supports a mosaic of semi-natural vegetation representative of its designed habitat type (e.g. wet grassland, marshy margins, aquatic vegetation), with a consistently high proportion of native species appropriate to the hydrological regime.	Through appropriate substrate selection, hydrological design, and the use of locally native seed mixes or plugs, a diverse and native vegetation community can be established and maintained, reducing dominance by ruderal or invasive species.
B	The SuDS feature demonstrates a range of microhabitats and structural diversity, including both wet and dry zones, gently shelving margins, and variation in vegetation height.	Design and management can ensure varied mowing/maintenance regimes to maintain structural diversity (including scattered scrub) and habitat niches.
C	Water quality and hydrological function support habitat condition — water levels are stable (within design parameters), and there is no evidence of significant eutrophication, sediment smothering, or contamination.	Subject to the design of the drainage features measures can be implemented to control such issues.
D	Invasive non-native plant species (as listed on Schedule 9 of the Wildlife and Countryside Act 1981) are absent, and aggressive native species (e.g. Typha latifolia, Phragmites australis) do not dominate more than 30% of the vegetated area.	Routine inspections and vegetation management (e.g. selective cutting or removal) can prevent invasive or dominant species from establishing or spreading.
E	The SuDS feature shows evidence of ecological connectivity, with links to adjacent habitats (e.g. grassland, hedgerow, woodland edge) that allow for species movement and colonisation.	During design, SuDS features can be aligned and planted to connect with surrounding semi-natural habitats, using native species that reflect local habitat networks.
F	Physical condition of the SuDS feature is intact: no excessive compaction, erosion, or damage from vehicles or footfall, and design features (e.g. inlet/outlet, banks, planting shelves) remain functional.	Maintenance regimes should prevent trampling, erosion, or sediment build-up and promptly repair any physical damage to maintain ecological and hydraulic function.

Annex 2

Site Baseline Plan BNG1



KEY

Site Boundary

BASELINE HABITATS

Bare Ground

Developed Land

Other Neutral Grassland

Tall Forbs

Woodland

Modified Grassland

Mature Trees

Hedgerow

Tree Line

0 50 100 150 m

0013 Gerway Farm, Ottery St Mary

Plan BNG1: Ecological Baseline

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Carrant House, Teddington, Tewkesbury,
Gloucestershire, GL20 8NE

Annex 3

Post-Development Plan BNG2

KEY

- Site Boundary
- Indicative Tree Planting
- Mature Trees

Hedgerows

- Enhanced Hedgerows
- Tree Line
- Retained Hedgerow
- Proposed Native Hedgerows

Post-Development Habitats

- Developed Land and Vegetated Gardens
- Proposed Other Neutral Grassland
- Enhanced Other Neutral Grassland
- Sustainable Drainage System (SuDS)
- Woodland

0 50 100 150 m

0013 Gerway Farm, Ottery St Mary

Plan BNG2: Biodiversity Net Gain Post Development Plan

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Bennu Environmental Limited,
Carrant House, Teddington, Tewkesbury,
Gloucestershire, GL20 8NE

Appendix 7 Flood Risk Assessment and Drainage Strategy

RLRE Consulting Engineers

Land at Gerway Farm,

St Mary

Flood Risk Assessment & Drainage Strategy