



Westbury Former Cement Works, Sewage Treatment Works,

Westbury, Wiltshire, BA13 4TQ

AEUK 1667

Preliminary Ecological Assessment

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1. BACKGROUND

Commission

Alder Ecology UK Ltd was commissioned by Tarmac to undertake a Preliminary Ecological Assessment of the site; Former Westbury Cement works, Sewage Treatment Works (STW), Westbury, Wiltshire BA13 4TQ with a proposal to provide repairs to the STW. The commission also looked at the potential of the site to contain protected species or habitats that may be impacted by the proposed works. The site is located at National Grid reference ST 88857 52724 (what3words broth.already.gladiator).

Site Details

The site is situated in a rural location in open countryside and is located within the extent of the former Cement works site and is mainly bare ground and scrub habitat.

Proposed works- Sewage Treatment Works (STW)

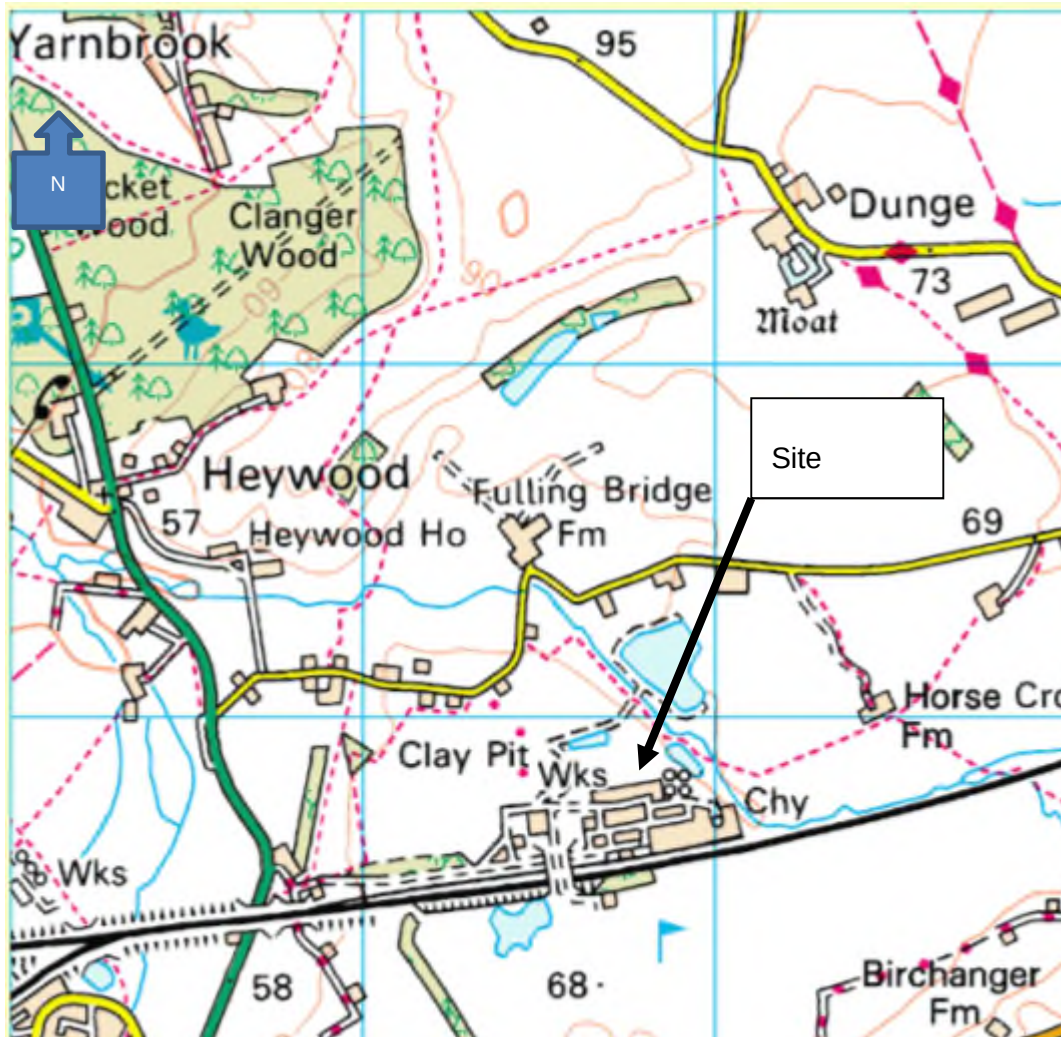
The existing sewage works suffered significant damage during the earlier demolition works such that roof of the primary tank has collapsed, the pumping station is non-operational and there are significant works required to refurbish the rotating biological filters. In addition to the damage caused during the demolition works to the treatment plant the below ground pipework is known to be in a very poor state and would need significant works to renovate to an operational state.

There is thus a real need to reinstate the existing sewerage system to serve the retained CRH Premises and if possible provide future connectivity.

Install a new foul primary settlement tank at the eastern extremity of the "known to be serviceable" system. Install a pump chamber which will pump settled effluent to the dosing syphon of the existing plant, where this discharges into the existing filter beds which will be renovated and ultimately discharges into the Pond System.

The depth of the primary tank would be approximately 5m deep with an inlet some 2m below existing ground level which would afford gravity connections into the primary tank. The rising main from the pumped effluent would be shallow and thus avoid deep excavations likely to encounter existing foundations and services.

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Map 1 shows site of the assessment

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Aerial 1 showing the approximate site footprint for the survey assessment area see full submission for exact details.

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Plan 1 Redline application boundary on sealed surface crushed stone.

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2. INTRODUCTION

This report presents the findings of a Preliminary Ecological Assessment (PEA) undertaken on 18th July 2025. An assessment has been provided on the potential value of the site for wildlife based on the PEA results obtained. Conclusions have been drawn about the site and an approach has been proposed to the way any development may proceed with enhancements for the site.

Mr Roger Martindale BA (Hons), MSc CEnv, MCIEEM, Ecologist at Alder Ecology UK Ltd who is a full member of The Chartered Institute of Ecology and Environmental Management (MCIEEM) and Chartered Environmentalist (CEnv), undertook the PEA assessment during July 2025. The surveyor has over 25 years' experience of this type of work.

The aim of the PEA is to identify existing habitat types, to determine the existence and location of any ecologically valuable areas and to identify the presence of any protected species or habitats suitable for supporting such species that may be impacted by the scheme.

The objectives of the PEA were to:

- Identify habitat types on site;
- Assess the importance of habitat types;
- Identify the potential presence of any protected species and recommend further survey
- Assess the likely impact areas within any potential development

3. FIELD STUDY

Preliminary Ecological Assessment (PEA)

This survey consists of a walkover survey of the site observing habitats and if they are considered important or have potential to hold protected species. This is not a Phase 1 Habitat Survey and therefore does not detail species compositions within identified habitat areas or assign them an alpha numeric code. The survey included a search for the presence or evidence of UK protected species and UK priority habitats and species.

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4. LEGISLATIVE AND NATIONAL GUIDANCE

The Wildlife and Countryside Act 1981 (as amended) affords protection to species of fauna and flora included in schedules 5 and 8 of the act. Additionally section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 lists species and habitats that are of principal importance for the conservation of biodiversity in England and Wales. Those pieces of legislation together with national, regional and local Biodiversity Action Plans (BAPs) seek to safeguard areas containing protected species and habitats.

The Wildlife and Countryside Act 1981, the Section 41 list and the BAPs are used to guide decision-makers such as landowners in implementing their duty to have regard to the conservation of biodiversity in England, when carrying out their normal functions. This legislation is further strengthened by the European Habitats directive 1992 which affords special protection to species and habitats of European importance. Protected species and habitats are a material consideration in the planning process and an assessment of their presence/absence from a site and the likely impact of a development on such species or habitats must be undertaken prior to any planning submission.

5. LIMITATIONS TO THE ASSESSMENT

The PEA habitat survey was carried out at an optimal time of year for summer floristic species compositions and given the limited range of habitats on site is thought to be accurate. The timing of the survey may limit the ability of the assessment to recognise seasonal changes on site. Although given the baseline conditions and habitats present it is considered to be accurate. Full access was available for the site survey and a drone was used to aid survey techniques.

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6. DATA REVIEW

Table 1 Protected habitats 5km search BA13 4TQ

Site name	Area (Ha)	Site Description
Round Wood, Heywood	7.91ha	LWS Ancient semi- natural broadleaved woodland on flat clay land. Most of the site is a Woodland Trust reserve, with a small area in the south used by a neighbouring equestrian centre.
Kettle Lane Wood	2.53ha	LWS A small woodland of coppiced Oak and Ash with an old, possibly Iron Age, bank and ditch and an old winterbourne bed crossing the wood.
Bratton Chalk	11.22ha	LWS Mesotrophic pasture within an ancient hill fort and some sections of the ramparts with unimproved calcareous grassland.
Blue Circle Cement Works Chalk pit	13.35ha	RIGS site 1994
Picket & Clanger Wood	66.89ha	SSSI Conifer & semi-natural woodland
Bratton Downs	400.07ha	SSSI Calcareous grassland

NOTE: SSSI Impact Risk Zone (inside SSSI IRZ) needs to consult with Natural England

Table 2 Protected and Notable Species Records 2km search BA13 4TQ

Name	Records	Distance from site to closest record	Date of most recent record	Comment
Badger	3	2km	2022	
Bird assemblage	118	2km	2021	

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Brown hare	5	2km	2021	
Common lizard	6	2km	2022	
Dormouse	1	2km	2022	
Greater Horseshoe bat	1	2km	1996	
Hedgehog	45	2km	2023	
Otter	7	2km	2023	
Slow worm	1	2km	2022	
Water vole	1	2km	2024	

The list of species is limited which is likely due to the rural location and the lack of recent development in the area which can give rise to further background records.

Bird assemblage

Of the 118 species of bird historically recorded within 2km of the site a total of 22 species are listed on section 41 of the NERC Act 2006 as Species of Principle Importance for Nature Conservation and 7 species listed as schedule 1 species so the area has value in that respect.

Table 3 Priority bird species or schedule 1 bird species are listed below.

Species	Number of records	Priority species	Schedule 1 species
Barn owl	7		Yes
Brambling	4		Yes
Bullfinch	44	Yes	

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Common Cuckoo	3	Yes	
Corn bunting	56		
Curlew	2	Yes	
Fieldfare	51		Yes
Firecrest	1		Yes
Grasshopper warbler	4	Yes	
Grey partridge	4	Yes	
Herring gull	101	Yes	
House sparrow	223	Yes	
Kingfisher	26		Yes
Lapwing	7	Yes	
Lesser redpoll	1	Yes	
Linnet	68	Yes	
Marsh tit	4	Yes	
Quail	1		Yes
Redwing	45		Yes
Reed bunting	26	Yes	
Ring Ouzel	2	Yes	
Skylark	130	Yes	
Song thrush	82	Yes	

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Spotted flycatcher	14	Yes	
Starling	384	Yes	
Tree pipit	2	Yes	
Tree sparrow	4	Yes	
Turtle dove	2	Yes	
Yellow wagtail	3	Yes	
Yellowhammer	102	Yes	

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7. PHOTOGRAPHIC PLATES



Plate 1 showing the site looking north east and approximate route of the works



Plate 2 showing site looking east with STW arrowed

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Plate 3 Showing the STW overgrown with ruderal vegetation and scrub



Plate 4 showing the bare ground of crushed concrete sealed surface zero rated in BNG criteria

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Plate 5 showing site habitats of limited value and zero rated on BNG score



Plate 6 area of scrub but not used at the time of survey by nesting birds

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Plate 7 looking east towards STW



Plate 8 STW overgrown with vegetation

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Plate 9 Colonised by ruderal species



Plate 10 area of the proposed works at the STW

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8. RESULTS

Habitats

Habitat Description

The site supports a limited range of generally low quality natural habitats and is part of a wider farm complex.

Table 4 Habitats on site

Habitat	National importance	Regional importance	Local importance	Site importance	Distinctiveness
<i>Scrub</i>				Yes	<i>Low</i>
<i>Bare ground</i>				Yes	<i>Zero rated</i>
<i>Ruderal habitat</i>				Yes	<i>Low</i>

Scrub

The site has scattered scrub on the bare ground comprising single stands of buddleia, hawthorn, elder and scrub and around the STW. Stands of scrub shown in plate 6 contains bramble and there are areas of bramble and hawthorn around the STW but mixed with buddleia scrub. The site scrub is assessed to be of site value and low distinctiveness due to presence of buddleia but outside impact area.

Bare ground

The majority of the area of the proposed works is bare ground and is crushed stone/concrete from the demolition works in 2015 and this accounts for approximately 85-90% of the total area. Some vegetation has started to colonise areas of bare ground outside the work area but this is of limited value. The bare ground is assessed to be of site value and zero rated in BNG criteria.

Ruderal habitat

The site contains ruderal habitat mixed in with the scrub around the STW with species such as willowherb ragwort, docks, bindweed and thistles. The ruderal species are good for insects

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and can, if controlled in small patches add a mix of habitats for some foraging bird species. The ruderal vegetation has been assessed to be of site value, but outside impact area.

Non-Native Invasive Species

The site does not contain any non-native invasive species listed on schedule 9 of the Wildlife and Countryside Act 1981.

Protected and Otherwise Notable Species

The site has limited opportunities for low numbers of common species primarily as a foraging resource but opportunities for permanent occupation by wildlife on site are limited due to the habitat types.

Table 5 Potential protected species associated with the site as a foraging resource

	European importance	National importance	NERC section 41 species	Local BAP species
Bats	Yes	Yes	Yes	Yes
Bird assemblage		Yes	Yes	Yes
Hedgehog			Yes	Yes
Reptiles			Yes	Yes
Amphibian species			Yes	Yes

Bats

The site has resources for bat foraging but there are no opportunities for roosting bats on the site of the proposed works. There are opportunities for foraging in the wider area of open fields and ponds that back on to the site and the area is not served by municipal lighting which tends to reduce species composition. Further surveys will not be required to determine the use of the site by bat species. There are bat roosts on wider site but they will not be directly or indirectly impacted by the proposed works. The site is assessed to be low value to foraging bats and negligible value to roosting bats.

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Birds

The wider landscape (within 2km) has records of a total of 22 species which are listed on section 41 of the NERC Act 2006 as Species of Principle Importance for Nature Conservation and 7 species listed as schedule 1 birds. The site does not have sufficient habitats or connection to the wider landscape to support all such species for breeding and a limited ability to support some of the species listed for occasional foraging. The general area has potential to hold low numbers of common foraging bird species and has potential to support breeding birds within the scrub on site. The site is assessed to be of local value to common, NERC and schedule 1 bird species as a limited foraging resource and low value as a breeding site within the scrub.

Hedgehog

There are good number of local records of hedgehog within 2km of the site and they are likely to occur close to the site or even on site as they will forage in the scrub of this site and fields and habitats in close proximity. The habitats on the wider site have value for foraging hedgehog but the area of the proposed works has limited value. The proposed works are unlikely to significantly impact upon hedgehog habitat or breeding provided the works are undertake with ecological guidance. The site has been assessed to be of low value for foraging and breeding hedgehog.

Reptiles

The site does contain habitat which is used by reptile species such as slow worms, lizards and snakes especially associated with the bare ground and scrub. Reptiles have been previously recorded on site in 2015 and 2020 and the site has largely remained unchanged since that time so they are likely to still be present on site. The proposed works may impact directly or indirectly upon reptile habitat or breeding sites but local reptile species will benefit from the retention of deadwood habitat and ruderal species on site after the work is completed. The works area needs to be checked for the presence of reptiles prior to the works and mitigation measures taken to move them from the work area and avoid killing and injury a requirement under the law. The site has been assessed to be of moderate/low value for reptile species.

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Amphibian species

The site does not contain suitable foraging habitat for common amphibian species and contains no areas suitable for breeding amphibian species. There are two ponds located to the east of the site suitable for amphibians but they will not be impacted by the proposed works. The ponds also contain fish which will further reduce the value for amphibian use. The site is assessed to be of low value to foraging amphibians and negligible value to breeding amphibians.

Otters

The site does not contain suitable resources to support otters as a standalone feature but does link to the pond system east of the works area which otters can use to travel through the landscape. The site is assessed to be of negligible value for otters but may form part of a commuting corridor. Any development of the site will not impact directly or indirectly on otter movements.

Water voles

Although there are no recent records (within last 30 years) of water voles within 2km of the site the ponds east of the site has potential for water voles although the actual site has no features suitable for use by water voles and they would not be impacted by the proposed works. Any proposed works will not directly impact the ponds and would not impact water voles if present. The site is assessed to be of negligible value for water voles.

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9. CONCLUSIONS

The PEA concludes that any proposed works on the site will not significantly adversely change the ecological baseline or impact directly or indirectly on ecological receptors and that further surveys will not be required for the site.

The works will not impact on either priority or non-priority habitats and is an existing sealed surface crush stone which are assigned a zero score in the statutory biodiversity metric, meaning that these surfaces are effectively exempted from the 10% net gain requirement.

This exemption ensures that BNG is applied proportionately and that a development does not incur unnecessary extra cost. It also encourages developers to design site works in ways to avoid impacting habitats on site in the first place, following the biodiversity net gain hierarchy.

However, it is recommended that a reptile mitigation plan is put in place prior to the works to remove reptiles from the proposed works area. Reptiles have been previously recorded on site in 2015 and 2020 and the site has largely remained unchanged since that time so they are likely to still be present on site.

The site is located inside the Natural England SSSI, Impact Risk Zone (IRZ) and will therefore require NE consultation to ensure any risk to the SSSI's located within 5km of the site can be assessed (see Table 1 for potentially affected sites).

The site does not contain habitats that are nationally or locally significant and does not contain any priority habitats as listed in the NERC Act 2006. The remaining habitats on site are of very limited conservation value and easily re-created. The site does not sit adjacent to habitats or sites that are locally or nationally significant and any proposed development of the site will not on its own or in combination affect the integrity or designatory features of such sites and will not lead to permanent habitat loss of significant habitats.

The proposed works does not have the potential to significantly impact upon protected species, species of principle importance for nature conservation and locally listed BAP species in the long term provided recommendation below are followed.

Overall the site habitats have been assessed as being of low ecological value although the site does provide opportunities for foraging wildlife as part of the wider landscape and open fields locally. Any works on the site as is currently proposed will not significantly impact on

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local ecological resources and will not significantly adversely change the ecological baseline. If the scheme implements the recommendations below then the ecological baseline can be maintained and enhanced.

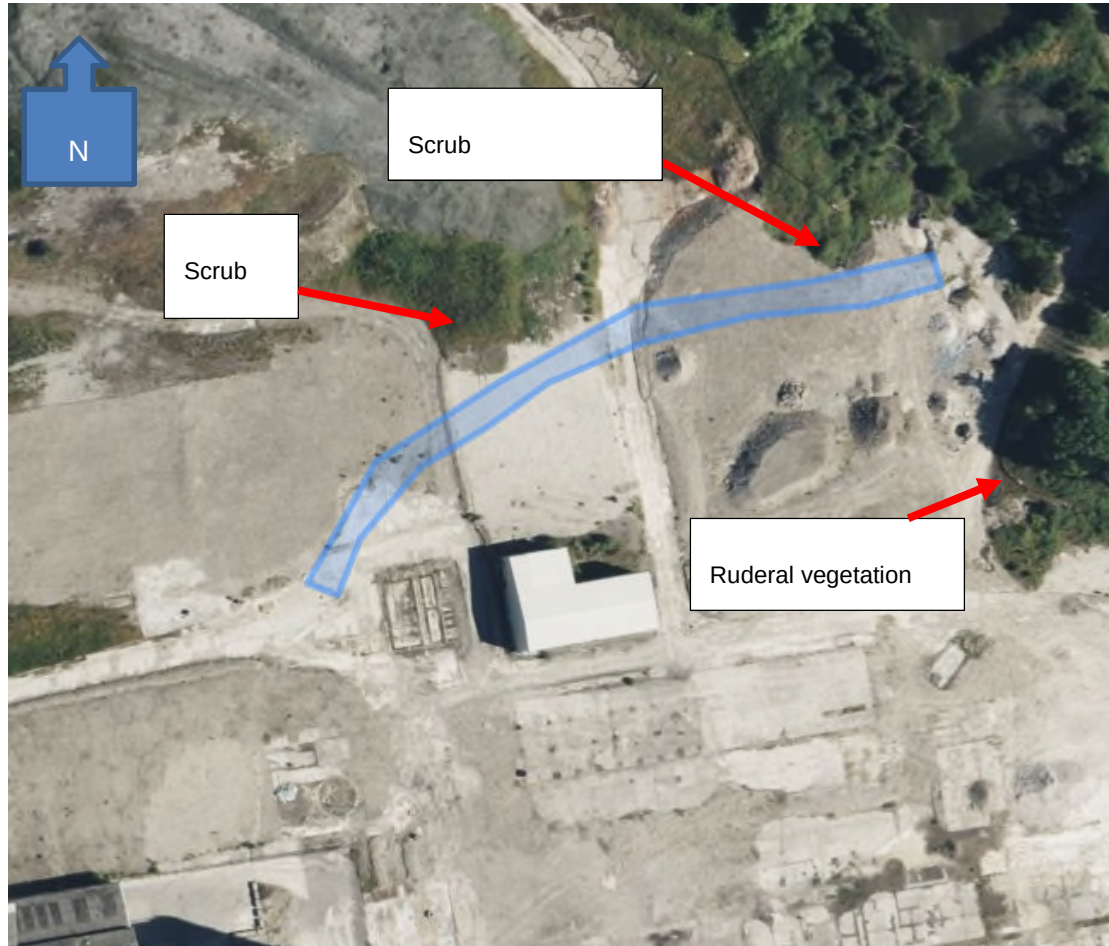
10.RECOMMENDATIONS

The following recommendations are made for the site:

- Produce a wildlife protection plan for the site to protect habitats and species outside the proposed works area on the wider site.
- Produce a reptile mitigation plan to move any reptiles from the proposed works area prior to the works.
- Provide x2 artificial bird nest boxes to be located on trees on the wider site for hole nesting species.
- Provide x2 artificial bat boxes to be located on trees on site for common species such as pipistrelle
- Provide x1 hedgehog nest box on the wider site

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11. Appendix 1 - Habitat Map



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12. Appendix 2 ecological enhancements

Hole nesting box mounted at approx. 2.5m east or north facing



Bat box suitable for pipistrelle bats mounted at approx. 3m south or west facing



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Hedgehog nest box

