



Ecological Impact Assessment

Staverton Flood Defence

Cereal Partners UK

Staverton, Trowbridge, Wiltshire, BA14 6PG

Prepared by:

SLR Consulting Limited

Broadwalk House, Southernhay West, Exeter, EX1
1GE

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Draft	16 October 2025	Emma Griffin	Lis Weidt	Michelle Robertson
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Acronyms and Abbreviations

AEP	Annual Exceedance Probability
A/MCIEEM	Associate/Full Member of Chartered institute of Ecologists and Environmental Managers
BAP	Biodiversity Action Plan
BNG	Biodiversity Net Gain
BoCC	Birds of Conservation Concern
CEMP	Construction Environmental Management Plan
CIEEM	Chartered institute of Ecologists and Environmental Managers
CSLR	Class Survey Licence Returns
DBW	Daytime Bat Walkover
EclA	Ecological Impact Assessment
ECOW	Ecological Clerk of Works
EPS	European Protected Species
EPSL	European Protected Species Licence
EPSML	European Protected Species Mitigation Licence
GCN	Great Crested Newt
GLTA	Ground-Level Tree Assessment
HAP	Habitat Action Plan
INNS	Invasive Non-Native Species
IUCN	International Union for Conservation of Nature
LBAP	Local Biodiversity Action Plan
LDP	Local Development Plan
LPA	Local Planning Authority
MAGIC	Multi-Agency Geographic Information for the Countryside
NE	Natural England
NERC	Natural Environment and Rural Communities Act 2006 (as amended)
OS	Ordnance Survey
PEA	Preliminary Ecological Appraisal
PEAR	Preliminary Ecological Appraisal Report
PRA	Preliminary Roost Assessment
PRF	Potential Roosting Feature
PSL	Protected Species Licence
RLB	Red Line Boundary
SAC	Special Area of Conservation
SLR	SLR Limited
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest



UK	United Kingdom
UKHab	UK Habitat Classification
SINC	Site of Nature Conservation Interest
SNCI	Site of Nature Conservation Interest
WCA	Wildlife and Countryside Act 1981 (as amended)
WSBRC	Wiltshire & Swindon Biological Records Centre



1.0 Introduction

In October 2025, SLR Consulting Limited (SLR) was commissioned by Cereal Partners UK to carry out an Ecological Impact Assessment (EclA) in relation to kerb modification and extension to improve flood defence of land relating to Cereal Partners at Staverton Mill in Trowbridge, BA14 6PG (central Ordnance Survey (OS) National Grid Reference (NGR) ST 85653 60944), hereafter referred to as the 'Site' (see Appendix A).

1.1 Site Description

The Site comprised vehicle parking facilities, further hardstanding for vehicle movements, the cereal factory building, gravel areas, mowed grassland, a 'butterfly area' with mown paths, and a strip of woodland along the north-eastern edge.

The northern boundary of the Site was bordered by woodland and the river Avon; the southeast boundary was bordered by a railway line and the southwest was bordered by a grass field. The surrounding area mostly comprised of agricultural fields. There was a small woodland further west and the closest large urban developments were Staverton and Trowbridge to the south.

1.2 Details of the Proposed Development

The proposed development is for the installation of flood resilience measures approximately 490 metres in length. This will include; *removal of existing concrete kerb and replacement with new (max 450mm n[sic] height), installation of new concrete kerb (450mm in height) and flood gates.*

1.3 Purpose of this Report

The purpose of the report is:

- To describe the baseline data collection and assessment methods used;
- To summarise the baseline ecological conditions;
- To identify and describe all potentially significant ecological effects associated with the proposed development;
- To set out the design, mitigation and compensation measures required to ensure compliance with nature conservation legislation and to address any potentially significant ecological effects;
- To identify how mitigation and compensation measures will/could be delivered;
- To provide an assessment of the significance of any residual effects in relation to the effects on biodiversity and the legal and policy implications;
- To identify appropriate enhancement measures and how these will/could be delivered; and
- To set out any requirements for post-construction monitoring.

1.4 Evidence of Technical Competence and Experience

This report has been authored by Emma Griffin BSc (Hons), a Project Ecologist at SLR. Emma has over three years' experience within ecological consultancy and is a qualifying member of Chartered Institute of Ecology and Environmental Management (CIEEM).



The field survey and report review was conducted by Lis Weidt, BSc. Lis is an Associate Ecologist with 10 years' experience within environmental consultancy. Lis is a full member of the CIEEM.

The report was quality assured by Michelle Robertson, BSc, MSc. Michelle is an Associate Ecologist with over 15 years' ecological experience within consultancy, charity and government organisations.

1.5 Relevant Legislation and Policy

The key wildlife legislation underpinning the conservation of habitats and species and National planning policies are presented in Appendix B. The Local planning policy is presented below. The current policy is the "Wiltshire Core Strategy 2015"¹ however, a new policy "The Wiltshire Local Plan – Planning for Trowbridge September 2023"² is intended to be adopted in the third quarter of 2025.

1.5.1 Local Development Plan (LDP): Wiltshire Core Strategy 2015

Core Policy 50: Biodiversity and Geodiversity Protection

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

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

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

Biodiversity enhancement

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

¹ https://www.wiltshire.gov.uk/media/372/Wiltshire-Core-Strategy-adopted-2015/pdf/Wiltshire_Core_Strategy_2015.pdf?m=1735555642237 (Accessed: 6th October 2025)

² [Planning_for_Trowbridge_September2023.pdf](#) (Accessed: 6th October 2025)



Local sites

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

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

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



2.0 Methodology

2.1 Scope

The Site is depicted by the red line in Appendix A. The development footprint includes 490m of concrete kerb to the north of the Site. This area consisted of grassland, hardstanding, buildings and associated infrastructure.

For the desk study, records of protected and otherwise notable species, invasive non-native species (INNS), Protected Species Mitigation Licences, priority habitats and listings of statutory and non-statutory sites were searched for within a 2km radius of the Site boundary. The records and listings above guide this assessment by highlighting potential features on the Site, even if not observed during surveys. They establish the local significance of these ecological features and help evaluate how the development may affect them beyond the immediate development footprint.

For the field surveys, the study area includes all accessible parts within the Site boundary, and where possible, 30m beyond.

2.2 Baseline Data Collection

2.2.1 Desk Study

The desk study involved the collation and review of contextual information such as designated sites and past records of protected and priority species occurring within the potential zone of influence.

An ecological data search was received in August 2025 from the Wiltshire & Swindon Biological Records Centre (WSBRC).

An internet-based desk study was also undertaken, using Multi-Agency Geographic Information for the Countryside (MAGIC) website. The website provided information on habitats and species of principal importance for conservation in England.

A summary of the information and search areas obtained is outlined in Table 2-1 below.

Table 2-1: Desk Study Data Sources

Data	Search Area
Species	
Protected and Notable Species	2km ¹
Protected Species Mitigation Licence Applications	4km ² (Bats) 2km ² (Great Crested Newt-GCN)
S41 Species	2km ²
Habitats	
S41 Habitats	1km ²
Ancient Woodland	2km ²
Sites	
Statutory Protected Sites (Sites of Special Scientific Interest – Impact Zones)	Within the Site
Non-Statutory Protected Sites (e.g. Local Wildlife Sites (LWS), Site of Nature Conservation Interest (SNCI) or Site of Importance for Nature Conservation(SINC))	2km ¹



Data	Search Area
National Statutory Protected Sites	5km ²
International Statutory Protected Sites	10km ²
1= Wiltshire & Swindon Biological Records Centre. Received August 2025. 2= MAGIC ³ August 2025	

In light of the scope of the project, the search areas are sufficient to cover the potential zone of influence of the project in relation to designated sites, habitats and species. Biological records that are older than 10 years have been excluded.

A desk-based scoping exercise was undertaken using OS maps and aerial imagery to locate any waterbodies within 500m of the Site that could potentially support great crested newts (GCN) *Triturus cristatus*. The parameter is based on best practice guidance (English Nature, 2001)⁴, which advise that ponds up to 500m away from a development centred on those ponds could be affected by changes to a site. It should be noted that 500m is the upper, precautionary distance covering the maximum ranging possible for GCN; normal home ranges of GCN excluding unusual migratory or exploratory movements typically cover a smaller radius of up to 250m; however, these factors would be assessed in more detail if the assessment finds potential for GCN.

2.2.2 Field Surveys

2.2.2.1 Habitat Survey

A UK Habitat Classification (UKHab)⁴ survey was undertaken of the western entrance area on the 6th March 2025 (in relation to an entrance modification planning application) and the eastern area of the Site undertaken by Lis Weidt on the 11th of August 2025. These two survey results for the client have been amalgamated for the purpose of this assessment.

Habitats were mapped and features of interest were recorded. The habitats were mapped using the information gathered from the ecological walkover and followed the UKHab methodology⁵ and results are provided in Appendix A. Field evidence indicating the presence or potential presence of species that could constitute a material consideration in planning terms, such as protected or notable plant or faunal species were also recorded.

The UKHab is a comprehensive classification system for the UK that has been developed to benefit from changes in habitat categorisation, recording analysis in recent decades. The system comprises a principal hierarchy (the Primary Habitats) which include broad habitats and priority habitats and non-hierarchical secondary codes.

Searches were also made for INNS listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) (WCA), such as Japanese knotweed *Reynoutria japonica* and Himalayan balsam *Impatiens glandulifera*.

2.2.2.2 Condition Assessment for Biodiversity Net Gain

While undertaking the habitat survey, a condition assessment of each habitat parcel, using the criteria produced by Natural England⁶ was also undertaken for later use in a Biodiversity Net Gain (BNG) assessment. The condition assessment included, for example, collecting

³ Magic Map Application (Accessed 7th October 2025)

⁴ Great crested newt mitigation guidelines. English Nature August 2001.

⁵ The UK Habitat Classification Working Group (May 2023) The UK Habitat Classification User Manual Version 2.0.

⁶ Natural England. 2023. The Biodiversity Metric 4.0 -Technical Annex 1: Condition Assessment Sheets and Methodology. Peterborough: Natural England.



information on the physical characteristics of the habitat, the presence of positive/ negative indicator species and the presence of INNS. Each habitat parcel, that requires it, will be assigned condition score of 'poor', 'moderate' or 'good'.

2.2.2.3 Protected Species Assessment

As part of the appraisal the Site was assessed for its potential to contain protected or notable species. Further information on their legal protections is presented in Appendix B. Protected species assessed, but not limited to were:

- Badger *Meles meles*;
- Bats;
- Dormouse *Muscardinus avellanarius*;
- Nesting birds;
- Amphibians, including GCN;
- Reptiles; and
- Invertebrates.

Whilst not a full protected species survey, this method of survey enables experienced ecologists to obtain an understanding of the ecology of a Site such that it is possible either:

- to confirm the conservation significance of the Site and assess the potential for impacts on species likely to represent a material consideration in planning terms, or
- to establish the scope and extent of any additional specialist ecological surveys that will be required before such confirmation can be made.

2.2.2.4 Daytime Bat Walkover (DBW)

The study area was assigned a suitability level as per best practice guidelines (Collins J, 2023)⁷, based on the presence of habitats and features within the study area and within the wider landscape **Table 2-2** shows the criteria applied during the DBW.

Table 2-2; Categorisation of Foraging and Commuting Habitat for Bats

Suitability	Commuting and foraging habitats
None	No habitat features on Site likely to be used by any commuting or foraging bats at any time of the year (i.e. no habitat that provided continuous lines of shade/protection for flight-lines or generate/shelter insect populations available for foraging bats).
Negligible	No obvious habitat features on Site likely to be used as flightpaths or by foraging bats; however, a small element of uncertainty remains in order to account for non-standard bat behaviour.
Low	Habitat that could be used by small numbers of bats as flightpaths such as gappy hedgerow or unvegetated stream, but isolated i.e., not very well connected to the surrounding landscape by other habitat.
Moderate	Continuous habitat connected to the wider landscape that could be used by bats for flightpaths such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by for foraging such as trees, scrub, grassland or water.

⁷ Collins, J. ed. (2023). Bat Surveys for Professional Ecologists, Good Practice Guidelines (4th edition). Bat Conservation Trust, London.



Suitability	Commuting and foraging habitats
High	Continuous high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by bats for flightpaths such as river valleys, streams, hedgerows, lines of trees and woodland edge. Site is close to and connected to known roosts.

2.2.3 Limitations

2.2.3.1 Desk Study

Desk study data is unlikely to be exhaustive, especially in respect of species, and is intended mainly to set a context for the study. It is therefore possible that important habitats or protected species not identified during the data search do in fact occur within the vicinity of the Site. Interpretation of maps and aerial photography has been conducted in good faith, using recent imagery, but it has not been possible to verify the accuracy of any statements relating to land use and habitat context outside of the field study area.

2.2.3.2 Field Survey(s)

The field survey was undertaken during late summer following very dry and hot weather and therefore it is likely that some species within the grassland could not be identified.

The survey did not seek to identify all of the plant species within the study area and as such, this report does not provide an exhaustive list of flora found within the study area. However, it is considered that the survey results are representative of the habitats and flora of the Site.

It should be noted that lack of evidence of protected flora does not necessarily preclude a species from being present in varying seasons. The Site was visited over two days (March and August 2025 and amalgamated) at separate locations and as such seasonal variation in species composition is not reported within this report, the baseline in this report is considered to be an accurate representation of the Site at the time of writing.

2.3 Assessment Approach

The ecological evaluation and impact assessment approach used in this report is based on Guidelines for Ecological Impact Assessment in the United Kingdom and Ireland ("CIEEM guidelines"⁸).

2.3.1 Important Ecological Features

Ecological features can be important for a variety of reasons and the rationale used to identify them is explained in the text. Importance may relate, for example, to the quality or extent of the Site or habitats therein; habitat and/ or species rarity; the extent to which such habitats and/ or species are threatened throughout their range, or to their rate of decline.

2.3.1.1 Determining Importance

The importance of an ecological feature should be considered within a defined geographical context. The following frame of reference has been used in this case, relying on known/ published accounts of distribution and rarity where available, and professional experience:

- International; (i.e. Europe);

⁸ CIEEM (2018- updated 2024) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine version 1.3. Chartered Institute of Ecology and Environmental Management, Winchester.



- National (i.e. UK/ England, etc.);
- Regional (i.e. South-West of England);
- County (i.e. Wiltshire); and
- Local (i.e. within circa 5km).

The above frame of reference is applied to the ecological features identified during the desk study and surveys to inform this report.

The value of habitats has been measured against published selection criteria where available. Examples of relevant criteria include: descriptions of habitats listed on Annex 1 of the Habitats Directive; descriptions of habitats of principal importance for biodiversity under Section 41 of Natural Environment and Rural Communities (NERC) Act 2006; Local Wildlife Site Selection Criteria; and Habitat Action Plans (HAPs) contained within Local Biodiversity Action Plans (LBAP).

In assigning a level of value to a species, it is necessary to consider its distribution and status, including a consideration of trends based on available historical records. Reference has therefore been made to published lists and criteria where available. Examples of relevant lists and criteria include: species of European conservation importance (as listed on Annexes II, IV and V of the Habitats Directive or Annex 1 of the Birds Directive); species of principal importance for biodiversity under Section 41 of the NERC Act 2006 and Birds of Conservation Concern (BoCC)⁹.

For the purposes of this report ecological features of Site level importance or greater and/or subject to legal protection have been subject to detailed assessment. Effects on other ecological features are considered unlikely to be significant in legal or policy terms.

2.3.2 Impact Assessment

The impact assessment process involves the following steps:

- identifying and characterising potential impacts;
- incorporating measures to avoid and mitigate (reduce) these impacts;
- assessing the significance of any residual effects after mitigation;
- identifying appropriate compensation measures to offset significant residual effects (if required); and
- identifying opportunities for ecological enhancement.

When describing impacts, reference has been made to the following characteristics, as appropriate:

- Positive or negative;
- Extent;
- Magnitude;
- Duration;
- Timing;

⁹ Stanbury, A., Eaton, M., Aebischer, N., Balmer, D., Brown, A., Douse, A., Lindley, P., McCulloch, N., Noble, D., and Win I. 2021. The status of our bird populations: the fifth Birds of Conservation Concern in the United Kingdom, Channel Islands and Isle of Man and second IUCN Red List assessment of extinction risk for Great Britain. *British Birds* 114:723-747. Available online at <https://britishbirds.co.uk/content/status-our-bird-populations>.



- Frequency; and
- Reversibility.

The impact assessment process considers both direct and indirect impacts: direct ecological impacts are changes that are directly attributable to a defined action, e.g. the physical loss of habitat occupied by a species during the construction process. Indirect ecological impacts are attributable to an action, but which affect ecological resources through effects on an intermediary ecosystem, process or feature, e.g. the creation of roads which cause hydrological changes, which, in the absence of mitigation, could lead to the drying out of wet grassland.

Consideration of conservation status is important for evaluating the effects of impacts on individual habitats and species and assessing their significance:

- Habitats – conservation status is determined by the sum of the influences acting on the habitat that may affect its extent, structure and functions as well as its distribution and its typical species within a given geographical area.
- Species – conservation status is determined by the sum of influences acting on the species concerned that may affect its abundance and distribution within a given geographical area.

2.3.3 Significant Effects

The concept of ecological significance is addressed in paragraphs 5.24 through to 5.28 of CIEEM guidelines. Significance is a concept related to the weight that should be attached to effects when decisions are made. For the purpose of EclA, a 'significant effect' is an effect that either supports or undermines biodiversity conservation objectives for 'important ecological features' or for biodiversity in general. Conservation objectives may be specific (e.g. for a designated site) or broad (e.g. national/local nature conservation policy) or more wide-ranging (enhancement of biodiversity). Effects can be considered significant at a wide range of scales from international to local and the scale of significance of an effect may or may not be the same as the geographic context in which the feature is considered important.

2.3.4 Cumulative Effects

Cumulative effects can result from individually insignificant but collectively significant actions taking place over a period of time or concentrated in a location. Cumulative effects can occur where a proposed development results in individually insignificant impacts that, when considered in-combination with impacts of other proposed or permitted plans and projects, can result in significant effects.

2.3.5 Avoidance, Mitigation, Compensation and Enhancement

When seeking mitigation or compensation solutions, efforts should be consistent with the geographical scale at which an effect is significant. For example, mitigation and compensation for effects on a species population significant at a county scale should ensure no net loss of the population at a county scale. The relative geographical scale at which the effect is significant will have a bearing on the required outcome which must be achieved.

Where potentially significant effects have been identified, the mitigation hierarchy has been applied, as recommended in the CIEEM Guidelines. The mitigation hierarchy sets out a sequential approach beginning with the avoidance of impacts where possible, the application of mitigation measures to minimise unavoidable impacts and then compensation for any remaining impacts. Once avoidance and mitigation measures have been applied residual effects are then identified along with any necessary compensation measures, and incorporation of opportunities for enhancement.



It is important for the EclA to clearly differentiate between avoidance mitigation, compensation and enhancement and these terms are defined here as follows:

- Avoidance is used where an impact has been avoided, e.g. through changes in scheme design;
- Mitigation is used to refer to measures to reduce or remedy a specific negative impact *in situ*;
- Compensation describes measures taken to offset residual effects, i.e. where mitigation *in situ* is not possible; and
- Enhancement is the provision of new benefits for biodiversity that are additional to those provided as part of mitigation or compensation measures, although they can be complementary.



3.0 Detailed Project Description

In November 2024, flood waters came close to breaching the factory office buildings, risking safe production and manufacturing. Cereal Partners Worldwide Staverton manufactures approximately 22,000 tonnes of breakfast cereals annually for the UK market, including popular brands such as Shreddies and Shredded Wheat.

To safeguard the Site against potential future flooding and to facilitate further development and expansion, the implementation of a flood resilience scheme is proposed, which includes the design of a flood wall along the Site's perimeter. The description of development is as follows;

Installation of Flood Resilience Measures approx. 490 metres in length to include; removal of existing concrete kerb and replacement with new (max 450mm n[sic] height), installation of new concrete kerb (450mm in height) and flood gates (see Appendix C).

The positioning of the flood defence barrier seeks to make use of existing hardstanding and concrete infrastructure where possible and has been sited over 10 metres away from the river bank to minimise ecological impacts. The proposed development will provide a vital piece of flood defence infrastructure where it is needed.

The proposed strategy to improve flood resilience comprises several elements:

- Replacement of existing kerbs with higher, vehicle-containment kerbs;
- Installation of sheet piling and a shallow flood defence across open land and around the electricity substation;
- Flood gates at access points, forming a continuous line of defence alongside the Weston Cut.

The alignment of the proposed flood defence barrier extends to approximately 490 metres in length with a maximum height of 450mm.

These measures are designed both to improve Site safety and enhance the flood resilience of the factory. It is important to note that the main service yard will not be protected and will be allowed to flood during extreme events.

A Flood Risk Assessment prepared by Edenvale Young¹⁰ is submitted in support of this application for full planning permission. The assessment outlines the flood risk implications associated with this area of the factory campus and how the proposed development will mitigate the risk.

The proposed measures are Water Compatible and have been located outside of the modelled 1% Annual Exceedance Probability (AEP) plus 26% allowance for climate change. They will therefore result in no loss of floodplain storage during an event larger than the Design Flood, or increase flood risk elsewhere. During the fluvial Design Flood they will not increase flood risk elsewhere as there will be no interaction with flood water.

The proposed flood resilience measures would remove the factory site from Flood Zone 3 by providing significant protection from future flood events, whilst still maintaining a functional flood plan for the River Avon when needed. The defences constitute water compatible development, which is deemed appropriate to be located within zones 3a and 3b.

¹⁰ EdenvaleYoung (2025) Flood Risk Assessment Staverton Cereal Factory, Flood Resilience Measures



4.0 Baseline Ecological Conditions

The results of the desk and field survey are reported below and describe the baseline conditions at the Site and within the surrounding area. Due to the linear nature of the proposal a central point has been used to estimate distance and direction from the Site.

4.1 Designated Sites

4.1.1 Statutory Designated Sites

The Site was not within a statutory designated site. MAGIC confirms that there were two international statutory designated sites within 10km of the Site, and three national statutory designated sites within 5km. The location of the statutory sites in relation to the Site are presented in **Table 4-1**.

Table 4-1 Statutory Designated Sites within the search area; international sites within 10km and national sites within 5km of the Site

Site*	Distance from Site (km)	Feature
Gripwood Quarry SSSI	3.6 W	The Site locally hosts rich marine fauna including crinoids, brachiopods, molluscs, and bryozoans.
Green Lane Wood LNR	3.7 SE	The Site hosts several ancient woodland indicator plant species including Solomon's seal <i>Polygonatum</i> , stinking iris <i>Iris foetidissima</i> , and a host of orchids. Other species present on Site include grass snake <i>Natrix helvetica</i> , slow worm <i>Anguis fragilis</i> , and butterflies – including the silverwashed fritillary <i>Argynnis paphia</i> and Duke of Burgundy <i>Ducatus Burgundiae</i> .
Southwick Country Park LNR	4.9 SW	The Site contains veteran and ancient oak and ash trees, as well as established woodland flora. It hosts protected species including water vole <i>Arvicola amphibius</i> , nine species of bat – including Bechstein's bat <i>Myotis bechsteinii</i> , Horseshoe bat <i>Rhinolophus sp.</i> , 11 UK BAP Priority Species of Lepidoptera, 12 species of Odonata including the red listed scare chaser <i>Libellula fulva</i> , otter <i>Lutra lutra</i> , grass snake, adder <i>Vipera berus</i> , slow-worm, and 15 red-listed bird species.
Bath & Bradford on Avon Bats SAC	6.3 W, 7.7 NW, and 7.7 N	The Sites host several habitats including heath, scrub, maquis and garrigue, phygrana, and broadleaved deciduous woodland. It hosts three Annex II bat species – Greater horseshoe <i>Rhinolophus ferrumequinum</i> , lesser horseshoe <i>Rhinolophus hipposideros</i> , and Bechstein's bat.

*Site of Special Scientific Interest (SSSI), Special Area of Conservation (SAC), Special Protection Area (SPA), Local Nature Reserve (LNR)

There will be no direct impacts to any other non-statutory designated site due to the distance and lack of connecting habitat. No anticipated indirect impacts due to the small scale of the development, the majority of which will only affect existing made ground within an existing industrial development with no change of use.

Impacts upon statutory designated sites will therefore not be considered further.



4.1.2 Non-Statutory Designated Sites

WSBRC returned results for five non-statutory sites. The details of these sites are summarised below in **Table 4-2**.

Table 4-2 Non -Statutory Designated Sites within 2km of the Site.

Site	Distance (km)	Feature
Bristol Avon River LWS	12m N	One of the main river systems draining north-west Wiltshire.
Kennet & Avon Canal LWS	0.75 SE	A restored canal much used for recreation.
Great Bradford Wood LWS	1.3 SW	A large ancient woodland site with semi-natural broadleaved woodland and broadleaved and conifer plantation on a limestone plateau overlooking the River Frome.
Lady's Coppice LWS	1.95 N	A small stand of ancient semi-natural broadleaved coppice with standards woodland and adjacent mature broadleaved plantation.
Widbrook Wood Wildfowl and Wetlands Trust (WWT) Reserve LWS	2 SW	A stretch of mixed young mixed broadleaf plantation with meadow between the river Avon and Kennet and Avon canal.

The Site was located approximately south 12m from a section of the Bristol Avon River LWS and therefore the proposed works have potential to impact this designated site.

There will be no direct impacts to any other non-statutory designated site due to the distance and lack of connecting habitat. No anticipated indirect impacts due to the small scale of the development, the majority of which will only affect existing made ground within an existing industrial development with no change of use.

Therefore, only Bristol Avon River LWS will be considered further.

4.1.3 SSSI Impact Risk Zones

A Site of Specific Scientific Interest (SSSI) Impact Risk Zone is a defined zone around each SSSI in England that reflect the particular sensitivities of the features for which they are notified and indicate the types of development proposal that could potentially have adverse impacts. Developments of a certain size and nature that fall within SSSI Impact Risk Zones, require the Local Planning Authority (LPA) to consult with Natural England (NE) to determine whether the proposed development is likely to have an impact upon the SSSI.

The Site was within a SSSI Impact Risk Zone; however, it is not listed as a development which requires further consultation with Natural England.

4.1.4 Priority Habitats

The MAGIC website¹¹ returned a number of principle habitats and priority habitats within 2km, as per **Table 4-3** and **Table 4-4**, respectively. Three habitats of principal importance and two priority habitats are present within 2km of the Site.

¹¹ [Magic Map Application](#) (Accessed 7th October 2025)



Table 4-3. Habitats of Principle Importance within 2km of the Site

Habitat	Feature	Distance from site of nearest feature (m/km)	Number of areas of habitat
Woodpasture and Parkland	Possibly old boundary trees in parkland which has been managed through grazing.	0.6km N	2
Traditional orchard	Groups of fruit and nut trees planted on vigorous rootstocks at low densities in permanent grassland and are managed in a low intensity way.	0.7km NE	5
Coastal and floodplain grazing marsh	Periodically inundated pastures, rich in plants and invertebrates.	1.3km SW	1

Table 4-4. Priority Habitats within 2km of the Site.

Habitat	Feature	Distance from site of nearest feature (m/km)	Number of areas of habitat
Deciduous woodland	Semi-natural deciduous woodland.	0.6km N	18
Ancient woodland	Great Bradford Wood	0.8km W	3

The Site was located approximately 0.8km from Great Bradford Wood which was connected to the Site as it was down stream of the River Avon and therefore the proposed works have potential to impact this designated site through potential increase in flooding during operation. However, flood risk assessment undertaken in relation to the proposed project has found “... result in no loss of floodplain storage during an event larger than the Design Flood, or increase flood risk elsewhere. During the fluvial Design Flood they will not increase flood risk elsewhere as there will be no interaction with flood water.” (see Flood Risk Assessment prepared by Edenvale Young¹⁰).

Therefore, no direct or indirect impacts to any priority habitats is anticipated due to the distance and lack of connecting habitat and priority habitats will not be considered further.

4.2 Habitats

The results of the UKHab Survey are illustrated in map form in Appendix A and photographs are presented in Table 4-5 below. The unique UK Habitat Classification survey code (e.g., u1b6) habitat is attributed to is included in brackets within the text below. For the purposes of this report the habitats present within the Site have been mapped using the fine scale minimum mapping unit (25m², 5m length), in accordance with the UK Habitat Classification User Manual⁵. The relevant secondary codes are presented after the primary codes.

The following habitats were recorded within the Red Line Boundary (RLB) of the Site;

- Buildings – u1b5;
- Developed land – sealed surface - u1b6;
- Artificial unvegetated, unsealed surface - u1c;
- Built Linear Feature – u1e;
- Other neutral grassland – g3c;
- Bramble Scrub - h3d;



- Hedgerow Priority Habitat - h2a; and
- Other Lowland Mixed Deciduous Woodland - w1f7.

Table 4-5 UKHab and BNG Results Summary

Photograph	UK Hab Type Species	Condition assessment
Eastern Section		
	G4 - Modified grassland Secondary Code; 108 200 816 At the time of survey, following a recent cut, the grassland had an average sward height of approximately 10cm. The grass species comprised of an abundance (A) of perennial ryegrass <i>Lolium perenne</i>; frequent (F) number of annual meadow-grass <i>Poa annua</i>; and occasional (O) records of creeping bent <i>Agrostis stolonifera</i>. The broadleaf and herb species comprised of occasional (O) records of white clover <i>Trifolium repens</i>, ribwort plantain <i>Plantago lanceolata</i>, common sorrel <i>Rumex acetosa</i> and creeping buttercup <i>Ranunculus repens</i>; and rare (R) sightings of dandelion sp <i>Taraxacum</i> sp. and yarrow <i>Achillea millefolium</i>. One ash tree <i>Fraxinus excelsior</i> and one silver birch <i>Betula pendula</i> tree are present in the north-west of the grassland close to the woodland parcel. The ash tree presented signs of dieback fungus <i>Hymenoscyphus pseudoalbidus</i>	Poor
	w1h6 - Other woodland – mixed – mainly conifer Secondary cod: 816 A communal grassland is located east of the outdoor dining area. There are scattered young and mature trees that provide shelter to the dining area.	Poor
Eastern Section		



Photograph	UK Hab Type Species	Condition assessment
	U1b5 - Buildings	N/A
	U1b6 - Developed land; sealed surface. Other developed land	N/A
	U1b6 - Developed land; sealed surface. Other developed land Existing kerb along well managed grassland edge.	N/A



Photograph	UK Hab Type Species	Condition assessment
	g3c – Other Neutral Grassland secondary code 108 Species list: Cocks-foot <i>Dactylis glomerata</i> , Yarrow, Ribwort plantain, Autumn hawkbit <i>Leontodon autumnalis</i> , Perennial ryegrass, Creeping cinquefoil <i>Potentilla reptans</i> , Self-heal <i>Prunella vulgaris</i> , Common daisy <i>Bellis perennis</i> , Red fescue <i>Festuca rubra</i> .	Poor
	g3c – Other Neutral Grassland Secondary code: 13, 127 Species list: Yarrow, False oat grass <i>Arrhenatherum elatius</i> , Creeping cinquefoil, Buddleia <i>Buddleja davidii</i> , Bramble <i>Rubus fruticosus</i> agg., Cocks-foot, Dandelion, Nettle <i>Urtica dioica</i> , Wild teasel <i>Dipsacus fullonum</i> L., Southern globethistle <i>Echinops bannaticus</i> , Lavender <i>Lavandula angustifolia</i> , Common Knapweed <i>Centaurea nigra</i> , Spear thistle <i>Cirsium vulgare</i> . The short, mown paths contain Ragwort <i>Jacobaea vulgaris</i> and Couch <i>Elytrigia</i> sp.	Moderate
	(3)U1c – Artificial Unvegetated, Unsealed Surface Bramble, Ribwort Plantain, Wild teasel, Yarrow, Broadleaved dock <i>Rumex obtusifolius</i> , Yorkshire fog <i>Holcus lanatus</i> , Silver birch saplings, Dandelion <i>Taraxacum officinale</i> , Ryegrass <i>Lolium</i> sp., Scentless mayweed <i>Tripleurospermum inodorum</i> , Cranes bill sp. <i>Geranium</i> sp., Narrow leaved ragwort <i>Senecio inaequidens</i> and Self-heal.	N/A



Photograph	UK Hab Type Species	Condition assessment
	W1f7 – Other Lowland Mixed Deciduous Woodland Species list: goat willow <i>Salix caprea</i> , grey willow <i>Salix cinerea</i> , Bramble, Yew <i>Taxus baccata</i> , Sessile oak <i>Quercus petraea</i> , Alder <i>Alnus glutinosa</i> , Silver birch, ivy <i>Hedera helix</i> , Nettle, Dogs Mercury <i>Mercurialis perennis</i> , Elder <i>Sambucus nigra</i> , Pine sp. (rare), Field Maple <i>Acer campestre</i> .	Moderate
	(2)h2a – Hedgerow Priority Habitat Species list: Beech <i>Fagus sylvatica</i> , Field maple <i>Acer campestre</i> , Blackthorn <i>Prunus spinosa</i> , Hawthorn <i>Crataegus monogyna</i> .	Good
	H3d – Bramble Scrub Species list: Bramble.	N/A

The field survey did not find any priority, distinctive or high value habitats on Site. All habitats recorded on Site can be considered widespread and common. Therefore, habitats are not considered further.

4.3 Species

4.3.1 Plants

WSBRC returned records for 40 species within the 2km search radius of the Site recorded in the last 10 years.



4.3.1.1 Protected Plant Species

Schedule 8 of the WCA 1981 (as amended) () lists endangered plant species which are protected by law from being picked, uprooted or destroyed.

The WSBRC returned 11 records within 2km of the Site of Bluebell *Hyacinthoides non-scripta*. The closest record 860m SE of the Site.

No protected plant species were identified during the survey and protected plants will therefore not be considered further.

4.3.1.2 Threatened Plant Species

The data search returned records of four species that are threatened or listed as vulnerable on the IUCN red lists. This included:

- Three records of the species Stinking Chamomile *Anthemis cotula*. The closest record was 1.5km NW of the Site.
- Eight records of Dwarf Spurge *Euphorbia exigua*. The closest record was 1.5km NW of the Site.
- One record of Oak-leaved Goosefoot *Euphorbia exigua*. The closest record was 1.5km NE of the Site.
- One record of Strawberry Clover *Trifolium fragiferum*. The record was 1.6km SE of the Site.

There is also a record of one species listed on Schedule 41 of the NERC Act 2006 (as amended): Cornflower *Centaurea cyanus*. The record was 1.3km NW of the Site.

Other nationally rare species include rye brome *Bromus secalinus*, Box *Buxus sempervirens*, and Galingale *Cyperus longus*.

No threatened plant species were identified on Site during the UKHab surveys, and the habitats present are common and widespread. Therefore, threatened plant species are not considered further.

4.3.1.3 Invasive Plant Species

Schedule 9 of the WCA lists INNS that are already established in the wild, which continue to pose a conservation threat to native biodiversity and habitats.

No records of species listed as Schedule 9 INNS were returned from the WSBRC data search. During the UKHab survey Himalayan balsam was recorded present within the River Avon adjacent to the Site This was outside of the Site boundary and the area of proposed works therefore, INNS species will not be considered further within this report.

4.3.2 Invertebrates

Schedule 5 of the WCA lists endangered species which are protected from killing, injury, taking, possession, and disturbance or obstruction/destruction of place they use for shelter.

The data search returned records for nine invertebrate species. One record of Duke of Burgundy *Hamearis Lucina* butterfly was received from 1.5km SW of the Site, a species listed on Schedule 41 of the NERC Act 2006 (as amended).

There are also records for the species Jersey Tiger *Euplagia quadripunctaria*, an Annex 2 listed species under the Habitats Directive.

Other nationally rare species include Scarce Chaser, Common Darter *Sympetrum striolatum*, and Large Tortoiseshell beetle *Nymphalis polychloros*.



The habitats on Site were relatively common and widespread so therefore unlikely to be critical for protected or notable invertebrate species. Although the 'butterfly area' did contain a mix of tall forbs.

Due to the habitats present being common and widespread and therefore likely supporting common and widespread invertebrate species, rare or notable invertebrate species are not considered further.

4.3.3 Amphibians

All UK amphibians are protected from harm by Schedule 5 of the WCA. GCN are also listed in Annex IV of the Habitats Directive and afforded further protection from possession, control, transport and sale and it is an offence to injure or kill them.

WSBRC returned one record of great crested newt within 2km of the Site. The record was 1.1km NE of the Site.

A search for granted protected species mitigation licence applications within 2km of the Site was undertaken using MAGIC and returned no applications for GCN. A search for GCN Class Survey Licence Returns (CSLR) also returned no records for GCN.

Five waterbodies were identified within 2km of the Site using the MAGIC resource:

- c. 150m NE of the Site;
- c. 280m N of the Site;
- c. 250m SE of the Site;
- c. 340m SE of the Site; and
- c. 490m NW of the Site.

No suitable breeding waterbodies are present within the Site. The River Avon borders the Site and is likely to form a barrier for any such species due to its deepness and fast flow. The majority of the habitat within the Site was hardstanding and well managed grassland which do not offer suitable foraging or resting habitat for amphibians.

The grassland in the 'butterfly area' was rank in areas with managed paths intersecting it which could offer some foraging and resting habitat. Due to the distance of the known GCN 1.1km NE of the Site the lack of suitable connecting terrestrial habitat and the potential barriers of the Avon River GCN have been ruled out as having potential to be present therefore, common amphibians will be considered further in this report.

4.3.4 Reptiles

All species of common reptiles receive limited protection from harm under Section 9(1) of the WCA. The WSBRC returned eight records for the species Slow Worm, listed under Schedule 5 of the WCA and Schedule 41 of NERC. The closest record is 1.6km SE of the Site.

The Site was generally unsuitable for reptiles majority of the habitat within the Site was hardstanding and well managed grassland which do not offer suitable foraging or resting habitat. The grassland in the 'butterfly area' was rank in areas with managed paths intersecting it which could offer some foraging and resting habitat therefore, reptiles will be considered further in this report.

4.3.5 Birds

All naturally occurring wild birds in the UK are protected from persecution under the WCA. It is illegal to harm any wild bird, damage their eggs and destroy their nests whilst in use or being built. Bird species listed on Schedule 1 of the WCA are afforded extra legal protection concerning the disturbance of their young and interference whilst nesting.



A range of records comprising of 31 species of birds, including birds of prey, wetland, and farmland species have been recorded by the WSBRC. There are records of nine species listed under Schedule 1 of the WCA, some notable species are listed below in Table 4-6 with any additional protection listed:

Table 4-6 WSBRC notable/protected bird species from 1 km search area

Species	Number of records	Status	Distance from Site (nearest, m/km)
Barn Owl <i>Tyto alba</i>	1	WCA1i	0.8km southwest
Black Redstart <i>Phoenicurus ochruros</i>	1	BoCC ¹² Amber, WCA1i	0.6km southwest
Cetti's Warbler Owl <i>Cettia cetti</i>	2	WCA1i	0.6km southwest
Common Sandpiper <i>Actitis hypoleucos</i>	1	BoCC Amber	0.6km southwest
Dunnock <i>Prunella modularis</i>	2	BoCC Amber, Sect.41, UKBAP	0.9km northeast
Fieldfare <i>Turdus pilaris</i>	1	BoCC Red, WCA1i	1.0km southeast
Grasshopper Warbler <i>Locustella naevia</i>	1	BoCC Red, Sect.41, UKBAP	0.9km northeast
Greenfinch <i>Chloris chloris</i>	6	BoCCRed	0.8km northeast
Grey Wagtail <i>Motacilla cinerea</i>	1	BoCC Amber	0.9km northeast
Hen Harrier <i>Circus cyaneus</i>	1	BD1, BoCC Red, Sect.41, WCA1i	0.9km northeast
Herring Gull <i>Larus argentatus</i>	10	BoCC Red, Sect.41, UKBAP	0.9km northeast
Hobby <i>Falco subbuteo</i>	1	WCA1i	0.9km northeast
House Martin <i>Delichon urbicum</i>	13	BoCC Red	0.9km northeast
House Sparrow <i>Passer domesticus</i>	3	BoCC Red, Sect.41, UKBAP	0.9km northeast
Kingfisher <i>Alcedo atthis</i>	4	BD1, BoCC Amber, WCA1i	0.1km southwest
Lesser Black-Backed Gull <i>Larus fuscus graellsii</i>	1	BoCC Amber	0.9km northeast
Mallard <i>Anas platyrhynchos</i>	9	BoCC Amber	0.9km northeast

¹² Birds of Conservation Concern (BoCC)



Species	Number of records	Status	Distance from Site (nearest, m/km)
Mistle Thrush <i>Turdus viscivorus</i>	1	BoCC Red	0.9km northeast
Moorhen <i>Gallinula chloropus</i>	1	BoCC Amber	0.9km northeast
Redkite <i>Milvus milvus</i>	2	BD1, Red List (RL), NT, WCA1i	0.9km northeast
Redwing <i>Turdus iliacus</i>	1	BoCC Amber, RL CR, WCA1i	1.0km southeast
Rook <i>Corvus frugilegus</i>	8	BoCC Amber	0.1km southwest
Skylark <i>Alauda arvensis</i>	1	BoCC Red, Sect.41, UKBAP	0.6km southwest
Snipe <i>Gallinago Gallinago</i>	1	BoCC Amber	1.0km northeast
Song Thrush <i>Turdus philomelos</i>	4	BoCC Amber, Sect.41, UKBAP	0.9km northeast
Sparrowhawk <i>Accipiter nisus</i>	2	BoCC Amber	0.6km southwest
Starling <i>Sturnus vulgaris</i>	1	BoCC Red, Sect.41, UKBAP	0.9km northeast
Swift <i>Apus apus</i>	14	BoCC Red	0.8km northeast
Willow Warbler <i>Phylloscopus trochilus</i>	1	BoCC Amber	0.9km northeast
Woodpigeon <i>Columba palumbus</i>	16	BoCC Amber	0.9km northeast
Wren <i>Troglodytes troglodytes</i>	5	BoCC Amber	0.9km northeast

The woodland, individual tree, scrub and taller areas of grassland on Site could provide appropriate habitats for nesting birds, none of these habitats are proposed for removal therefore, birds will not be considered further in the report.

4.3.6 Mammals

4.3.6.1 Bats

Bats are protected from killing, injury, damage or destruction or obstruction of a resting place and disturbance while occupying a structure or place which it uses for shelter or protection' under the WCA and Conservation of Habitats and Species Regulations (2017).

The WSBRC records identified that the Site is within Bath and Bradford on Avon Bat SAC consultation zone and returned 13 notable bat species records within 2km of the Site, as well as general records for *Myotis sp.*, *Nyctalus sp.*, *Pipistrelle sp.*, and *Plecotus sp.*



Table 4-7: Bat species records within 2km of the Site

Species	Number of records	Status	Closest distance from Site
Soprano pipistrelle <i>Pipistrellus pygmaeus</i>	47	HabRegs2, HSD4, Sect.41, UKBAP, WCA5/9.4b, WCA5/9.4c	c. 200m southeast
Common pipistrelle <i>Pipistrellus pipistrellus</i>	82	HabRegs2, HSD4, WCA5/9.4b, WCA5/9.4c	c. 600m southwest
Serotine <i>Eptesicus serotinus</i>	14	HabRegs2, HSD4, RLGB.VU, WCA5/9.4b, WCA5/9.4c	c. 600m northeast
Noctule <i>Nyctalus noctula</i>	34	HabRegs2, HSD4, Sect.41, UKBAP, WCA5/9.4b, WCA5/9.4c	c. 600m northeast
Brown long-eared bat <i>Plecotus auritus</i>	23	HabRegs2, HSD4, Sect.41, UKBAP, WCA5/9.4b, WCA5/9.4c	c. 600m southwest
Natterer's bat <i>Myotis nattereri</i>	3	HabRegs2, HSD4, WCA5/9.4b, WCA5/9.4c	c. 700m northeast
Daubenton's Bat <i>Myotis daubentonii</i>	10	HabRegs2, HSD4, WCA5/9.4b, WCA5/9.4c	c. 700m northeast
Lesser Horseshoe bat <i>Rhinolophus hipposideros</i>	23	HabRegs2, HSD2p, HSD4, Sect.41, UKBAP, WCA5/9.4b, WCA5/9.4c	c. 900m southeast
Greater Horseshoe bat <i>Rhinolophus ferrumequinum</i>	24	HabRegs2, HSD2p, HSD4, Sect.41, UKBAP, WCA5/9.4b, WCA5/9.4c	c. 1.2km southwest
Leisler's bat <i>Nyctalus leisleri</i>	12	HabRegs2, HSD4, RLGB.Lr(NT), WCA5/9.4b, WCA5/9.4c	c. 1.6 m southwest
Barbastelle bat <i>Barbastella barbastellus</i>	1	HabRegs2, HSD2p, HSD4, RLGB.VU, Sect.41, UKBAP, WCA5/9.4b, WCA5/9.4c	c. 1.6km northeast
Nathusius's pipistrelle <i>Pipistrellus nathusii</i>	3	HabRegs2, HSD4, RLGB.Lr(NT), WCA5/9.4b, WCA5/9.4c	c. 1.7 km southeast

Granted Protected Species Licence (PSL) Applications

A search for granted protected species mitigation licence applications was undertaken on MAGIC which revealed 19 granted applications for bats within a 4km radius, six of which are in date at this time. Those in date are detailed in **Table 4-8** below.

Table 4-8. Granted PSLs for Bats within 4km.

Licence Return	Species	Licence Type	Distance (km)
2019-39554-EPS-MIT	Brown long-eared; Common Pipistrelle; Lesser horseshoe	Destruction of a breeding site	0.76
2019-39554-EPS-MIT-1	Brown long-eared; Common Pipistrelle; Lesser horseshoe	Destruction of a breeding site	0.76



Licence Return	Species	Licence Type	Distance (km)
2020-44595-EPS-MIT	Brown long-eared; Common Pipistrelle; Greater Horseshoe; Lesser horseshoe; Natterer's Bat	Damage and destruction of both a resting and breeding site	0.88
2018-37074-EPS-MIT	Brown long-eared; Common Pipistrelle; Soprano Pipistrelle; Whiskered Bat	Destruction of a resting site	2.88
2020-48491-EPS-MIT	Common Pipistrelle	Destruction of a resting site	3.47
2015-15090-EPS-MIT	Common Pipistrelle; Lesser horseshoe	Destruction of a resting site	3.46

Daytime Bat Walkover

The habitat within the Site was dominated by hardstanding, factory buildings and associated parking. There were discrete areas grassland which are well managed and regularly mown with one small area of rank grassland ('butterfly area') and a small area of woodland with the river Avon running along the northern edge of the woodland which could provide some limited bat foraging within the Site.

The Site is therefore considered to have **low** potential for commuting and foraging bats (refer to Table 2-2) due to the high level of level of anthropomorphic activity (human presence, vehicle movement, noise and lighting) and limited extent of suitable foraging habitat.

Potential Roost Assessment (PRA)

The buildings on Site were large, flat roofed factory buildings, consisting of well-maintained brick walls and large expanses of metal sheet walls. Due to the regular use of the buildings, a lack of gaps in the brickwork and lack of insulation for the metal sheeting, the building was assessed as having negligible potential for bat roosts and no further surveys regarding the buildings are required.

The trees in the woodland had potential for roosting opportunities to be present but are to be retained and therefore did not require further surveys.

The Site has itself had low potential for supporting bats overall, however the area the works are to occur in were negligible for supporting bats, as the area comprised mostly hardstanding and mown grass. Therefore, bats are not considered further in this report.

4.3.6.2 Badger

Badgers and badger setts are protected under the Protection of Badgers Act 1992. This makes it an offence to kill or take a badger, to cruelly ill-treat a badger, or to interfere with a badger sett, including disturbing a badger while it is occupying a sett.

WSBRC returned 14 records of badger, the closest record is 0.6km SW of the Site.

No badger field signs were observed during the Site visit, additionally the grassland does not provide an appropriate habitat for sett building. Though the bank in the woodland could provide appropriate habitat for badgers, however, the banks are on the River Avon and floods yearly therefore it is unlikely that badger setts would become present within 30m of the works. Therefore, badgers are not considered further in this report.



4.3.6.3 Dormice

Hazel dormice are protected from killing, injury, damage or destruction or obstruction of a resting place or breeding site; and disturbance while occupying a structure or place which it uses for shelter or protection' under both Schedule 5 of the WCA 1981 (as amended) and the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.

No records of dormouse were returned from WSBRC. There were no suitable habitats, in the area of Site where the works are due to occur; therefore, dormouse are not considered further.

4.3.6.4 Otter, Water Vole and Beaver

Otters are protected from killing, injury, damage or destruction or obstruction of a resting place or breeding site; and disturbance while occupying a structure or place which it uses for shelter or protection under both Schedule 5 of the WCA 1981 (as amended) and the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.

WSBRC returned six records of otter, the closest record is 1km SW of the Site.

Water voles are protected from killing, injury, damage or destruction or obstruction of a resting place or breeding site; and disturbance while occupying a structure or place which it uses for shelter or protection under both Schedule 5 of the Wildlife and Countryside Act 1981 (as amended)

WSBRC returned one record of water vole, the record is located 0.9km SE of the Site.

Beavers *Castor fiber*, are now listed in Schedule 2 of the Conservation of Habitats and Species Regulations 2017, making it an offence to deliberately capture, injure, kill or disturb beavers, or damage and destroy their breeding sites or resting places without a wildlife management licence from Natural England.

WSBRC returned 78 records of beaver the closest record is located 0.06km NE of the Site.

The river Avon provides a suitable habitat for otters, water voles and beavers; however, the river was located 12m away from the proposed works (at it's closest edge), which will primarily affect existing hardstanding and the removal of c. 130m of well managed grassland which does not provide suitable habitat for any of these species. They will therefore not be considered further.

4.3.6.5 Other Mammals

Hedgehog *Erinaceus europaeus* are listed under the Wild Mammals Protection Act (1996) which prohibits cruel treatment of hedgehogs, and they are a Species of Principal Importance under Section 41 of NERC.

WSBRC returned 53 records of hedgehog, the closest record was 0.4km SW of the Site. Suitable habitat for this species was present within the Site, in particular the 'butterfly area' therefore, hedgehogs are considered further.

Records for Brown Hare *Lepus europaeus* and Rabbit *Oryctolagus cuniculus* were also returned from the search.

One medium-sized mammal hole was found on Site, in the butterfly area, this was too small for badger and could be rabbit. Therefore, other mammals will be considered further within this report.



4.4 Summary of Important Ecological Features

Table 4-9: Summary of Important Ecological Features Subject to Detailed Assessment

Ecological Feature	Scale at which Feature is Important	Comments on Legal Status and/or Importance
Bristol Avon River (LWS)	County	The River Avon is one of the main river systems draining north-west Wiltshire. It is located c.12m north of the proposed development. The river is outside of the development footprint however there remains potential for indirect impacts to occur as the Site.
Amphibians	Site	Protected under Schedule 5 of the WCA. GCN are also listed in Annex IV of the Habitats Directive. Potential for limited resting habitat to be affected by the proposed works.
Reptiles	Site	Protected under Schedule 5 of the WCA. Potential for limited resting habitat to be affected by the proposed works.
Other Mammals; Hedgehog	Site	Protected under the Wild Mammals Protection Act (1996) and NERC S41. 53 records of hedgehog were returned with the closest located 0.4km from the Site. Potential for limited resting habitat to be affected by the proposed works.



5.0 Assessment of Effects and Mitigation Measures

The following design principles and “designed-in” mitigation have informed the assessment of impacts.

- Within the design of the proposal good practice environmental and pollution control measures are employed with regard to current best practice guidance such as, but not limited to, the following:
 - CIRIA C532, ‘Control of water pollution from construction sites: guidance for consultants and contractors’ (2001) ;and
 - CIRIA C741, ‘Environmental good practice on site guide’ (2015 4th Ed.).

Taking the above into account, the principal potential impacts of the proposed development are outlined in the following sections.

5.1 Bristol Avon River (LWS)

The River Avon is located 12m north (at it’s closest edge) to the proposed kerb installation. Therefore, there is potential for impacts on the LWS through changes in water quality and quantity.

5.1.1 Construction

There is potential for impacts on the water quality during construction due to accidental spills or increase in sediments washed into the river from the Site.

Fluctuations in water quantity and quality can have far-reaching consequences for both aquatic and terrestrial invertebrate communities. Poor water quality, including increased turbidity, suspended solids, or chemical pollutants, could impair feeding, reproduction, and oxygen availability for aquatic species. In terrestrial settings, lower moisture levels can render wetland and grassland habitats less suitable, potentially leading to population declines and reduced biodiversity.

Designed in mitigation of best practice will be incorporated into the proposed development in order to protect the water environment from pollution incidents. The mitigation measures will also include (but not be limited to):

- During construction machinery will adopt best working practices and measures to protect the water environment, including those set out in the Guidance for Pollution Prevention (GPP1)¹³;
- All fuel and chemical storage to be on hard standing and sighted away from the river;
- Spill kits will be available and used if any spills occur;
- An existing vehicle management system is in place and will continue to be utilised to reduce the potential conflicts between vehicles and thereby reduce the risk of collision; and
- A speed limit is already imposed on Site to reduce the likelihood and significance of any collisions”.

¹³ GPP 1: Understanding your environmental responsibilities - good environmental practices (October 2020)



5.1.2 Operation

The proposed works have potential to impact this designated site through potential increase in flooding during operation.

However, flood risk assessment undertaken in relation to the proposed project has found “... *result in no loss of floodplain storage during an event larger than the Design Flood, or increase flood risk elsewhere. During the fluvial Design Flood they will not increase flood risk elsewhere as there will be no interaction with flood water.*” (see Flood Risk Assessment prepared by Edenvale Young¹⁰).

5.1.3 Significance of Residual Effects

Following the implementation of the mitigation measures detailed above, it is anticipated that the effects of the proposed development will be non-significant for Bristol Avon River (LWS).

5.2 Common Amphibians

No potential breeding habitat for amphibians was present within the Site. The grassland in the ‘butterfly area’ was rank in areas with managed paths intersecting it, which could offer some foraging and resting habitat for common amphibians (if present).

5.2.1 Construction

In order to minimize potential habitat loss grassland turfs will be lifted and stored in sections and then re-laid around the installed kerb footing.

There is potential for injury, harm or killing of common amphibians during the removal of grassland turves. In order to mitigate for the potential harm of common amphibians that may be present within the ‘butterfly area’, the areas to be cleared of vegetation and stripped, will first be subject to a hand search and inspection by an Ecological Clerk of Works (ECoW), immediately prior to any work. This search will also involve the hand search of any suitable refugia (e.g. brash and log piles, rock/debris piles, scrub/shrub roots). If any amphibians are found during these searches, these would be relocated to the retained habitat north of the proposed kerb installation.

The vegetation will then be cut in two stages using hand tools, under supervision from the ECoW. The vegetation will be cleared in a northern direction to allow for amphibian dispersal into retained habitat. The first cut will take the vegetation down to 20cm. After the area is re-inspected by the ECoW a final cut can take the vegetation to ground. The cuts will only be undertaken at a time of year when night-time temperatures are above 5°C. Once the grassland is down to ground level the turves can be lifted and appropriately sorted in cool damp conditions until re-laid.

5.2.2 Operation

The new installed kerbs will act as barrier for amphibians to move between north and south and could isolate individual animals within the retained ‘butterfly area’ which will be intersected by the new kerb.

However, wider landscape permeability will be maintained via a gap in the kerbing of 46m across the Weston Canal Cut. In addition, animals will also continue to be able to access the woodland strip through security fencing along the eastern edge of the Site.

If it is deemed that this does not provide sufficient permeability for amphibians, then amphibian ‘ladders’ can be included within the kerb design and fitted every 20m on alternative sides of the kerb.



5.2.3 Significance of Residual Effects

Following the implementation of the mitigation measures detailed above, it is anticipated that the effects of the proposed development will be non-significant for amphibian including GCN (if present).

5.3 Reptiles

The grassland in the 'butterfly area' is rank in areas with managed paths intersecting it which could offer some foraging and resting habitat for common reptiles (if present).

5.3.1 Construction

In order to minimize potential habitat loss grassland turfs will be lifted and stored in sections and then re-laid around the installed kerb footing.

There is potential for injury, harm or killing of common reptiles during the removal of grassland turves. In order to mitigate for the potential harm of common reptiles that may be present within the 'butterfly area'.

The same process described in section 5.2.1 for common amphibians will also protect reptiles from accidental harm. Any reptiles found during the ECoW and vegetation strip would be encouraged to move into the retained habitat north of the proposed kerb installation.

The cuts will only be undertaken at a time of year when night-time temperatures are above 5°C. Once the grassland is down to ground level the turves can be lifted and appropriately sorted in cool damp conditions until re-laid.

5.3.2 Operation

The new installed kerbs will act as barrier for reptiles to move between north and south and could isolate individual animals within the retained 'butterfly area' which will be intersected by the new kerb.

However, the reptile species most likely to be present is slow worm, from desk study records. Slow worms have a particular semi-fossorial lifestyle and tend to maintain a small foraging area, which means the 'butterfly area' is unlikely to support high number of slow worms. The 'butterfly area' will maintain the inclusion of the flood defence kerb would be unlikely to significantly impact the local population of common reptiles (if present).

Wider landscape permeability will be maintained via a gap in the kerbing of 46m across the Weston Canal Cut. In addition, animals will also continue to be able to access the woodland strip through security fencing along the eastern edge of the Site.

5.3.3 Significance of Residual Effects

Following the implementation of the mitigation measures detailed above, it is anticipated that the effects of the proposed development will be non-significant for reptiles (if present).

5.4 Other Mammals

The grassland in the 'butterfly area' was rank in areas with managed paths intersecting it which could offer some foraging and resting habitat for other mammals (e.g. hedgehog, rabbit).

5.4.1 Construction

In order to minimize potential habitat loss grassland turfs will be lifted and stored in sections and then re-laid around the installed kerb footing.



There is potential for injury, harm or killing of other mammals during the removal of grassland turves. In order to mitigate for the potential harm of other mammals that may be present within the 'butterfly area'.

The same process described in section 5.2.1 for common amphibians will also protect other mammals from accidental harm. Any other mammals found during the ECoW and vegetation strip would be encouraged to move into the retained habitat north of the proposed kerb installation.

The cuts will only be undertaken at a time of year when night-time temperatures are above 5°C. Once the grassland is down to ground level. The kerb installation is located c. 8m for the small mammal hole and therefore it is unlikely that this mammal hole will be impacted by the proposed works and can be maintained in situ.

5.4.2 Operation

The new installed kerbs could act as barrier for hedgehogs to move between north and south and could isolate individual animals within retained 'butterfly area' which will be intersected by the new kerb.

However, wider landscape permeability will be maintained via a gap in the kerbing of 46m across the Weston Canal Cut. In addition animals will also continue to be able to access the woodland strip through security fencing along the eastern edge of the Site.

5.4.3 Significance of Residual Effects

Following the implementation of the mitigation measures detailed above, it is anticipated that the effects of the proposed development will be non-significant for other mammals (if present).

5.5 Cumulative Effects

The Wiltshire Council Planning Portal was searched for any active or proposed applications which could present any potential cumulative effects. No recent applications (refused or not yet determined) were found through the portal which had the potential for cumulative effects.

Due to the nature of the proposals, the strong set of embedded and integrated mitigation and enhancement measures included in this planning application, the low predicted level of change, and the absence of any significant effects, it is concluded that no additional impacts are expected from in-combination or cumulative effects with other planning applications or approved developments in the local area.

The detailed assessment of effects in isolation has concluded that there will only be a 'very low' or 'low' magnitude of change predicted for all effects. Consequently, no significant related effects are predicted for any of the biodiversity receptors being considered either in isolation, in combination or as inter-related effects.

5.6 Biodiversity Net Gain

BNG is a development approach that ensures wildlife habitats are left in an improved condition compared to their state before the development. In England, BNG is a legal requirement under Schedule 7A of the Town and Country Planning Act 1990, as amended by Schedule 14 of the Environment Act 2021. Developers are required to achieve a minimum BNG of 10%, meaning the development must result in either a greater area or better-quality natural habitat than existed prior to the project¹⁴.

¹⁴ <https://www.gov.uk/government/collections/biodiversity-net-gain> accessed xx/xx/xx



To facilitate the installation of flood defence kerbs, the majority of the kerbs will replace existing kerb on existing hardstanding with only small sections located within grassland area to the west and east of the Site (see Appendix C).

In the grassland areas the existing grassland turves within the works area will be carefully lifted and temporarily stored. This process will be carried out in a manner that preserves the integrity of the turves, ensuring their viability for reinstatement.

Following the completion of kerb installation, the stored turves will be reinstated around the kerb footings to restore the original grassland cover and minimise any permanent loss of habitat. This approach will significantly reduce ecological disturbance and support the retention of the existing grassland character and species composition. This will help to reduce the permanent habitat loss to only the width of the above ground kerb which would result in a total area of 21m².

As the grassland will be reinstated with minimal permanent habitat loss, the area impacted falls below the thresholds defined under the UK BNG Guidelines for habitat loss requiring compensation. Therefore, the temporary disturbance associated with these works qualifies as an exempt activity under the current BNG guidance.

5.6.1 BNG Exemption

GOV.UK guidance states that a development would be exempt from BNG if it does not impact a priority habitat and impacts less than:

- 25 square metres (5m by 5m) of on-site habitat; and
- 5 metres of on-site linear habitats such as hedgerows.

A development 'impacts' a habitat if it decreases the biodiversity value.

As the total loss of habitat will be 21m² of other neutral grassland and all works are 10m from the river and outside of the riparian zone, the proposed works are considered to fall within the BNG exemption parameters. Therefore, BNG calculations are not needed, and the proposed development is except from the statutory BNG requirement.

5.7 Proposed Biodiversity Enhancements

One amphibian and reptile habitat pile will be created south of the new installed kerb which will comprise a small pile of logs situated within a location that is sunny and shaded throughout the day/year. Any future arising from grass cutting can then be piled on this location.

This will create a sheltered area which is not too dry nor prone to winter flooding and close to the edges of the retained woodland.

Management of the Himalayan balsam within the river adjacent to the Canal cut could be undertaken which would provide a significant benefit to downstream habitats as this would no longer be a seed source for further spread of the INNS.

5.8 Summary of Effects

The table below sets out a summary of the potential impacts, proposed mitigation and residual effects of the development. Once all of the proposed mitigation has been implemented, it is assessed that there will be a non-significant effect on most of the features assessed and a positive impact on the Site for reptiles, amphibians and for the removal of invasive plant species.



Table 5-1: Summary of Potential Impacts, Proposed Mitigation, Residual Effects and Proposed Compensation

Ecological Feature	Potential Impacts	Proposed Mitigation	Means of Delivering Mitigation	Residual Effects
Bristol Avon River (LWS)	Potential impacts on water quality and quantity	Designed in good practice pollution controls	Construction Environmental Management Plan (CEMP)	Not Significant
Amphibians	Potential killing and injury.	ECoW Pre-clearance search 2-phased cut	CEMP	Not Significant
Reptiles	Potential killing and injury.	ECoW Pre-clearance search 2-phased cut	CEMP	Not Significant
Common Mammals	Potential killing and injury.	ECoW Pre-clearance search 2-phased cut	CEMP	Not Significant



6.0 Conclusion

This report presents the results of ecological baseline studies and an impact assessment of the proposed hydroponics development on New Terrace, within Staverton, Wiltshire, BA14 6PL. The (OS) National Grid Reference (NGR) for the Site is ST 85859 60963. A data search and Site survey in 2025 identified the following ecological constraints with the potential to be impacted by the proposed development:

- Bristol Avon River LWS;
- Amphibians;
- Reptiles; and
- Other mammals (i.e. hedgehog and rabbit)

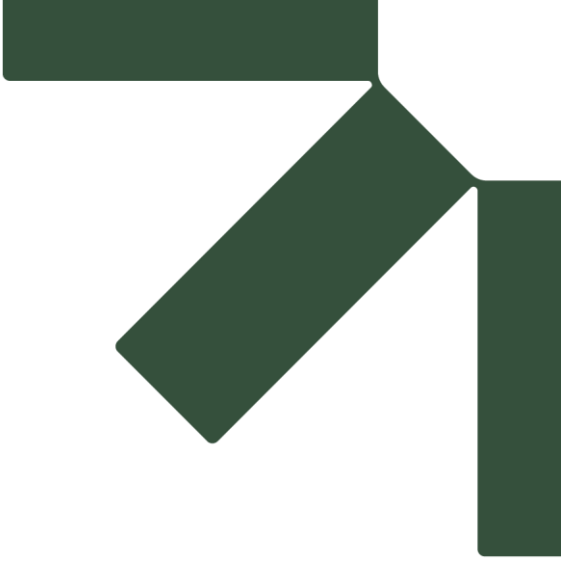
Mitigation in the form of pollution control and sensitive vegetation clearance will be implemented. There will be 21m² loss of other neutral grassland due to the installation of flood defence kerbs, which is below the threshold for mandatory BNG assessment.

The flood risk assessment undertaken in relation to the proposed project has found “... *result in no loss of floodplain storage during an event larger than the Design Flood, or increase flood risk elsewhere. During the fluvial Design Flood they will not increase flood risk elsewhere as there will be no interaction with flood water.*” (see Flood Risk Assessment prepared by Edenvale Young¹⁰).

Enhancements recommended are an amphibian and reptile habitat pile in the retained ‘butterfly garden’ and management of INNS- Himalayan balsam adjacent to the Canal cut.

With all the recommended mitigation and enhancement implemented, the proposed development is assessed to have a non-significant effect on the ecological features brought forward for assessment.





Appendix A UKHabitat Map

Ecological Impact Assessment

Staverton Flood Defence

Cereal Partners UK

SLR Project No.: 416.066493.00001

15 October 2025



LEGEND

Flood Defence Kerb

Flood Defence Kerb 5 m Buffer

Survey Area

Area Not Surveyed

Primary Habitat Classification

Heathland and Shrub - Hedgerows

h2a - Hedgerow Priority Habitat

h2b - Non-native and Ornamental Hedgerow

Grassland - Neutral Grassland

g3c - Other Neutral Grassland

Heathland and Shrub - Dense Scrub

h3d - Bramble Scrub

Urban - Built-up Areas and Gardens

u1b - Developed Land; Sealed Surface

u1b5 - Building

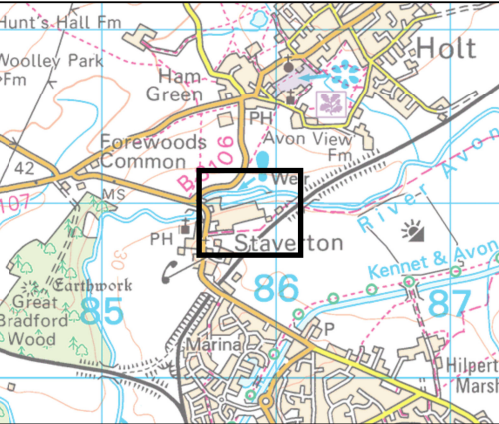
u1c - Artificial Unvegetated, Unsealed Surface

u1e - Built Linear Feature

Woodland and Forest - Broadleaved Mixed and Yew Woodland

w1f7 - Other Lowland Mixed Deciduous Woodland

w1h - Other Woodland; Mixed



STRIDE TREGLOWN



STAVERTON FLOOD
DEFENCE - ECOLOGY

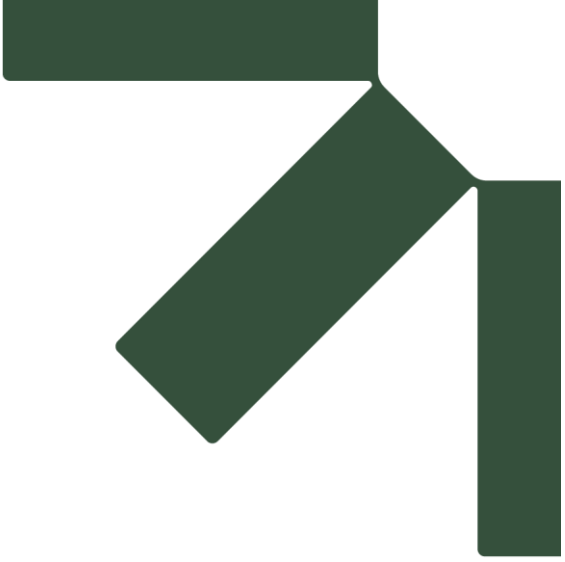
UK HABITAT REPORT

UK HABITAT BASELINE

FIGURE 1

Scale 1:1,750 @ A3

Date OCTOBER 2025



Appendix B Relevant Legislation and Policy

Ecological Impact Assessment

Staverton Flood Defence

Cereal Partners UK

SLR Project No.: 416.066493.00001

15 October 2025

Legislation

A summary of legislation relevant to (onshore) biodiversity in England is provided below. Note that the summary provided here is intended for general guidance only and the original legislation should be consulted for definitive information.

Environment Act (2021)

The Environment Act has wide ranging provisions including those around:

- Environmental governance;
- Environmental regulation;
- Waste and resource efficiency;
- Air quality and environmental recall;
- Water;
- Nature and biodiversity;
- Conservation covenants.

Of particular relevance is Part 6 of the Act which introduces “biodiversity gain in planning” and will apply in England to planning applications under the Town & Countryside Act and the Planning Act. Schedule 14 now requires that biodiversity gain be a condition of planning permission in England. These changes will be enacted through subsequent secondary legislation or regulations. This part of the Act also changes the responsibilities that Government or public bodies have by strengthening the existing NERC Act biodiversity duty. Public authorities are now required to seek to conserve and enhance biodiversity in the exercise of their functions.

Conservation of Habitats and Species Regulations 2017 (as amended)

The Conservation of Habitats and Species Regulations 2017 (as amended) (the Habitats Regulations) consolidate the Conservation of Habitats and Species Regulations 2010 with subsequent amendments. The Regulations transpose Council Directive 92/43/EEC, and certain elements of the Wild Birds Directive (Directive 2009/147/EC) (known as the Nature Directives) into national law. Changes were made by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 to the 2017 Regulations so that they operate effectively. Most of these changes involved transferring functions from the European Commission to make changes to the appropriate authorities in England. The obligations of a competent authority in the 2017 Regulations for the protection of sites or species do not change. Though they are described as the ‘Onshore’ regulations, they cover coastal waters out to 12 nautical miles (nm).

All other processes or terms in the 2017 Regulations remain unchanged and existing guidance is still relevant. The 2019 Regulations have created a national site network on land and at sea, including both the inshore and offshore marine areas in the UK. The national site network includes:

- existing SACs and SPAs
- new SACs and SPAs designated under these Regulations

Any references to Natura 2000 in the 2017 Regulations and in guidance now refers to the new national site network.

Under the Habitats Regulations it is an offence to deliberately capture, kill or disturb¹ wild animals listed under Schedule 2 of the Regulations as well as damage or destroy a breeding site or resting place of such an animal (even if the animal is not present at the time). Sites which are part of the National Site Network, including Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), are also protected under the Habitat Regulations, and any proposal that could affect them will require a Habitats Regulations Assessment (HRA).

The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017

Part 3 of the regulations provide for the protection of areas of habitats or species where maintenance of the status of water is an important factor. Under the regulations additional consideration may need to be given to sites in the form of a Water Framework Directive (WFD) assessment where a project lies in proximity to a water body or to linked water bodies which could be affected. This includes consideration of whether water bodies are WFD receptors in particular those of high status or have high status morphology.

Natural Environment & Rural Communities (NERC) Act 2006

Section 40 of the NERC Act 2006 places a duty on public authorities to have regard to the purpose of conserving biodiversity in the exercise of their functions. Public authorities include government departments, local authorities and statutory undertakers.

Section 41 of the Act (Section 42 in Wales) requires the publication of a list of habitats and species publish which are of principal importance for the purpose of conserving biodiversity. The Section 41 list is used to guide authorities in implementing their duty to have regard to the conservation of biodiversity.

Note that Sections 40 and 42 were superseded in Wales by the Environment (Wales) Act 2016 (see below).

Protection of Badgers Act 1992

The Protection of Badgers Act 1992 makes it illegal to kill, injure or take a badger or to intentionally or recklessly interfere with a badger sett. Sett interference includes disturbing badgers whilst they are occupying a sett or obstructing access to it.

Wildlife & Countryside Act 1981

The Wildlife and Countryside Act 1981, as amended by the Countryside and Rights of Way (CROW) Act 2000 and the Natural Environment and Rural Communities (NERC) Act 2006, consolidates and amends existing national legislation to implement the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) and Council Directive 79/409/EEC on the Conservation of Wild Birds (Birds Directive), making it an offence to:

- Intentionally kill, injure or take any wild bird or their eggs or nests (with certain exceptions) and disturb any bird species listed under Schedule 1 to the Act, or its dependent young while it is nesting;
- Intentionally kill, injure or take any wild animal listed under Schedule 5 to the Act;
- intentionally or recklessly damage, destroy or obstruct any place used for shelter or protection by any wild animal listed under Schedule 5 to the Act;
- intentionally or recklessly disturb certain Schedule 5 animal species while they occupy a place used for shelter or protection;

¹ Disturbance, as defined by the Conservation of Habitats and Species Regulations 2010, includes in particular any action which impairs the ability of animals to survive, breed, rear their young, hibernate or migrate (where relevant); or which affects significantly the local distribution or abundance of the species.

- Pick or uproot any wild plant listed under Schedule 8 of the Act; or
- Plant or cause to grow in the wild any plant species listed under Schedule 9 of the Act.

Planning Policy

A summary of national planning policy relevant to (onshore) biodiversity in England is provided below. Note that the summary provided here is intended for general guidance only and the original policy documents should be consulted for definitive information. For local planning policy relevant to biodiversity the relevant local plans should be consulted.

National Planning Policy Framework December 2024 (England)

The National Planning Policy Framework (NPPF)² sets out guidance for local planning authorities and decision-makers in how to apply planning policies when drawing up plans and making decisions about planning applications. Along with Government Circular 06/052, the broad policy objectives in relation to the protection of biodiversity and geological conservation in England through the planning system are set out. Specific policies relating to habitats and biodiversity are set out in paragraphs 187 to 195 of the NPPF.

Conserving and enhancing the natural environment

Paragraph 187 states that:

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

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;*
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs; minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and*
- f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate”.*

² Ministry of Housing, Communities & Local Government (December 2024).
<https://assets.publishing.service.gov.uk/media/675abd214cbda57cacd3476e/NPPF-December-2024.pdf>

Habitats and biodiversity

Paragraph 192 states that:

“To protect and enhance biodiversity and geodiversity, plans should:

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

Paragraph 193 of the NPPF states that:

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

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

Paragraphs 194 - 195 relate to the National Sites Network (referred to as habitats sites) and state:

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

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

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

Appendix C CPUK Flood Resilience Scheme; Planning Statement

Ecological Impact Assessment

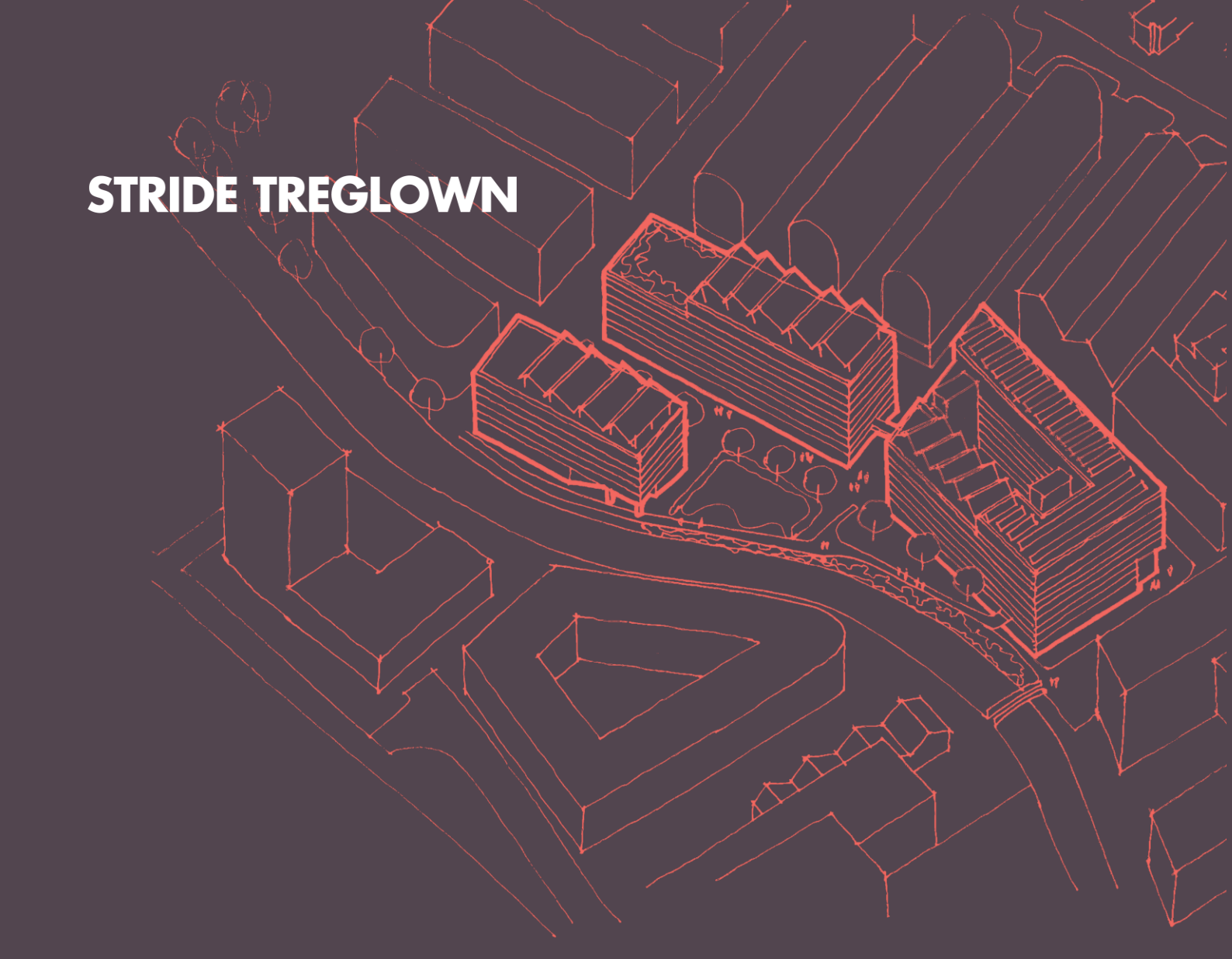
Staverton Flood Defence

Cereal Partners UK

SLR Project No.: 416.066493.00001

15 October 2025





STRIDE TREGLOWN

Certified



Corporation

Planning Statement

CPUK Flood Resilience Scheme | July
2025

CLIENT

Cereal Partners UK

JOB TITLE

Flood Defence Scheme

LOCATION

Staverton, Trowbridge

POSTCODE

BA14 6PG

JOB NO.

157222

DATE

24/07/2025

REVISION NUMBER

1

AUTHOR

Ed Flood

DIRECTOR

Graham Stephens

Revisions

Revision	Description
P01	Client issue for review

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1. Introduction

- 1.1.1 This Planning statement has been prepared in support of a full planning application for the installation of a new flood resilience strategy at the existing Cereal Partners Worldwide (CPW) food manufacturing campus at Staverton, Trowbridge.
- 1.1.2 This application follows a significant flooding event in November 2024 where flood waters came close to breaching the factory office buildings, risking safe production and manufacturing.
- 1.1.3 Cereal Partners Worldwide Staverton manufactures approximately 22,000 tonnes of breakfast cereals annually for the UK market, including popular brands such as Shreddies and Shredded Wheat. To safeguard the site against potential future flooding and to facilitate further development and expansion, the implementation of a flood resilience scheme is proposed, which includes the design of a flood wall along the site's perimeter. The description of development is as follows;

Installation of Flood Resilience Measures approx. 490 metres in length to include; removal of existing concrete kerb and replacement with new (max 450mm n height), installation of new concrete kerb (450mm in height) and flood gates.

- 1.1.4 This Statement should be read in conjunction with the submitted drawings and documents which are listed as follows;
- Application Forms
 - Site Location Plan
 - Flood Risk Assessment prepared by Edenvale Young
 - Dwg no. EVY1164-003 – Flood Resilience – Sections
 - Dwg No. EVY1164-001 – Flood Resilience – General Arrangement – Sheet 1
 - Dwg No. EVY1164-001 – Flood Resilience – General Arrangement – Sheet 2
 - Staverton Modelling Report prepared by Edenvale Young
 - Flood Estimation Report prepared by Edenvale Young

2. Site Context

2.1. Site Description

- 2.1.1 The existing Cereal Partners Worldwide (Nestle) food manufacturing campus is situated on the eastern side of the B3105 road and on the northern outskirts of the village of Staverton, Trowbridge. The site comprises a variety of industrial and packaging facilities and is bisected by a channel known as the Weston Cut. The main industrial buildings and service yards are located to the south of the site.

2.2. Flood Risk

- 2.2.1 The wider Staverton site currently consists of Flood Zones 2 and 3 (Flood Zone 3 being the highest probability of flooding with an annual probability greater than 1%). The image below indicates that the new factory building would be located within flood zones 2 and 3.

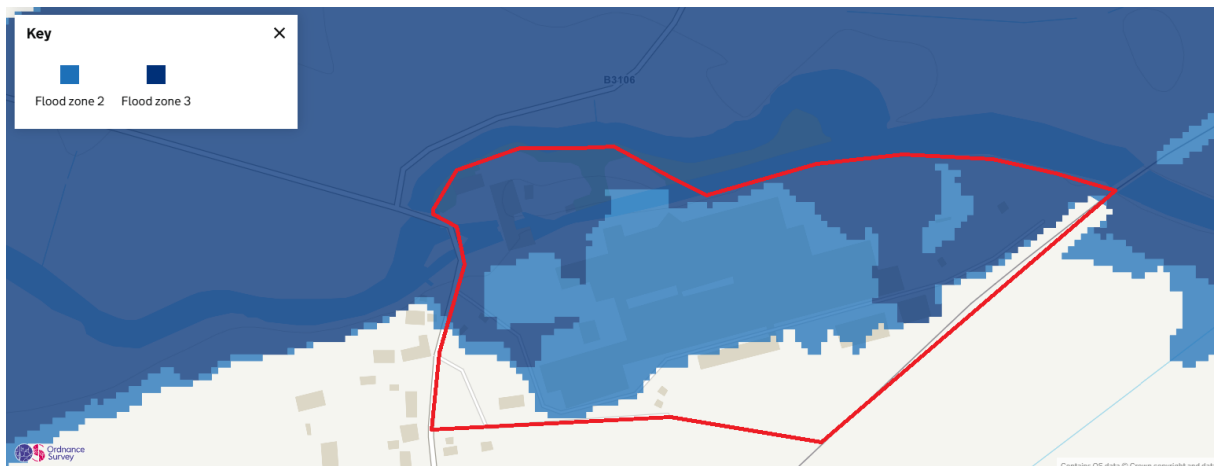


Figure 1: Image indicating current location of Flood Zones 2 and 3 with location of site outlined in red

2.3. Heritage

- 2.3.1 The site does not lie within a conservation Area. The nearest listed building is the Grade II Wesleyan Chapel located approximately 200 metres to the south west of the site.

2.4. Land Use/Environmental Designations

- 2.4.1 The site does not lie within a National Landscape Area (formerly Areas of Outstanding Natural Beauty), a National Park, a Site of Special Scientific Interest or any other EU designated site (Special Protection Areas or Special Areas of Conservation).

2.5. Planning History

- 2.5.1 The Staverton campus benefits from a wealth of positive planning history. Two of the most recent applications relates to the extension of existing buildings;
- Application Ref: 17/10332/FUL – Extension to existing wheat intake building – approved in December 2017
 - Application Ref: 17/02383/FUL – installation of replacement water tanks - approved in May 2017

- 2.5.2 The planning officer's report for 17/02383/FUL confirmed that the site is located within an established area of Staverton, identified as a small village under policy CP7 of the Wiltshire Core Strategy. Officers acknowledged that the proposals would be situated within the built up area of the Nestle Cereals factory and would support existing employment land, therefore acceptable in principle.

3. The Proposed Development

- 3.1.1 This application follows a significant flooding event in November 2024 where flood waters came close to breaching the factory office buildings, risking safe production and manufacturing
- 3.1.2 To safeguard the site against potential future flooding and to facilitate further development and expansion, the project team were appointed to undertake fluvial flood modelling for CPUK. The purpose of the flood modelling is to;
- Confirm the predicted flood risk to the site;
 - Support enhancements to the site’s resilience to flooding, including accounting for future climate change impacts, in recognition of the operational importance of the CPUK facility to Nestlé;
 - Demonstrate that the installation of improved vehicle containment kerbs—introduced to enhance vehicle and pedestrian safety—does not result in an increased flood risk elsewhere during the Design Flood Event.
- 3.1.3 The proposed strategy to improve flood resilience comprises several elements:
- Replacement of existing kerbs with higher, vehicle-containment kerbs;
 - Installation of sheet piling and a shallow flood defence across open land and around the electricity substation;
 - Flood gates at access points, forming a continuous line of defence alongside the Weston Cut.
- 3.1.4 These measures are designed both to improve site safety and enhance the flood resilience of the factory. It is important to note that the main service yard will not be protected and will be allowed to flood during extreme events.
- 3.1.5 The crest levels of the proposed defences are shown in Appendix A of the supporting Flood Risk Assessment prepared by Edenvale Young, and have been set at a minimum of 300mm above the modelled 1% Annual Exceedance Probability (AEP) flood level, including a 71% allowance for climate change. This corresponds to the Upper End climate change allowance for the 2080s epoch, representing a precautionary approach.
- 3.1.6 Some localised areas of the site are predicted to flood under the Upper End climate change scenario. However, these areas remain outside the extent of flooding for the Central climate change allowance and do not displace floodwater during the Design Flood Event (DFE). As such, they are considered permissible under current flood risk guidance.
- 3.1.7 The flood extents and water levels referenced above have been determined using bespoke hydraulic modelling, as described in Section 5 of the accompanying Flood Risk Assessment.
- 3.1.8 The proposed development does not impact upon safe pedestrian and vehicular access within the factory campus.

4. Planning Policy Context

- 4.1.1 This section identifies the key national and local planning policies of relevance to the site and proposed development.

4.2. National Planning Policy Framework (NPPF 2024)

- 4.2.1 At the heart of the NPPF is a presumption in favour of sustainable development. There are three overarching objectives (economic, social, and environmental) in achieving sustainable development, which are interdependent and need to be pursued in mutually supportive ways.

Section 4: Decision-making

- 4.2.2 Paragraph 39 states, “Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social, and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible”.

Section 14: Meeting the challenge of climate change, flooding and coastal change

- 4.2.3 The NPPF seeks to direct new developments away from areas at highest risk of flooding. Where 50 development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. Paragraph 173 confirms that a sequential risk-based approach should be taken to individual applications in areas known to be at risk now or in future from any form of flooding.
- 4.2.4 Within this context the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding (para 174)
- 4.2.5 Having applied the sequential test, if it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in Annex 3.
- 4.2.6 The application of the exception test should be informed by a strategic or site specific flood risk assessment, depending on whether it is being applied during plan production or at the application stage. To pass the exception test it should be demonstrated that: a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

4.1. The Local Development Plan

- 4.1.1 The current development plan for Wiltshire comprises of the Wiltshire Core Strategy adopted in 2015. This incorporates Saved policies from former District Local Plans, that were not replaced by the WCS, and will continue to be saved until replaced as part of the Local Plan Review process.
- 4.1.2 The following policies are relevant to the site and proposals;

Policy CP1 (Settlement Strategy)

- 4.1.3 Policy CP1 directs new development to the key settlements in Wiltshire, including Melksham where the site is located. Policy CP1 establishes in-principle support for the proposed development as it is located within the settlement boundary for Melksham where sustainable development is encouraged.

Policy CP2 (Delivery Strategy)

- 4.1.4 Policy CP2 further confirms support for new development within the settlement limits. In line with Core Policy 1, the delivery strategy seeks to deliver development in Wiltshire between 2006 and 2026 in the most sustainable manner by making provision for at least 178ha of new employment land.

Policy CP35 (Existing Employment Sites)

- 4.1.5 Policy CP35 confirms that Wiltshire's Principal Employment Areas (as listed in the Area Strategies) should be retained for employment purposes within use classes B1, B2 and B8 to safeguard their contribution to the Wiltshire economy and the role and function of individual towns. Proposals for renewal and intensification of the above employment uses within these areas will be supported.

Policy CP67 (Flood Risk)

- 4.1.6 All new development must include measures to reduce the rate of rainwater run-off and improve rainwater infiltration to soil and ground (sustainable urban drainage) unless site or environmental conditions make these measures unsuitable.

4.2. Wiltshire Local Plan Review

- 4.2.1 The Government requires every Local Plan to be reviewed at least once every five years. Wiltshire's Local Plan, the Wiltshire Core Strategy, was adopted in 2015, and is therefore being reviewed. This review is termed the 'Local Plan review'.
- 4.2.2 Wiltshire Council are in the advanced stages of their review which was submitted to the Secretary of State for examination in November 2024. It is expected that the Local Plan Review will be adopted in early 2026 which will likely coincide with the determination of an application for the new building.
- 4.2.3 Relevant updated policies are summarised below;

Policy 2 (Delivery Strategy)

- 4.2.4 Emerging Policy 2 sets an updated requirement to deliver approximately 160 hectares of new employment land (Use Class B2, B8, E(g)(i-iii)).

Policy 4 (Addressing Climate Change)

- 4.2.5 Policy 4 confirms that development proposals must support a move to carbon neutrality and adaptation to climate change. As such, a Sustainable Energy Statement confirming how it meets the tests set out within Policy 4 must be submitted alongside any application for full planning permission.

Policy 95 (Flood Risk)

- 4.2.6 The council will follow a sequential approach to flood risk management, in line with national policy and guidance. All development proposals will be required to consider the effect of the proposed development on flood risk from all sources, both on and offsite, commensurate with the scale and impact of the development.

- 4.2.7 Policy 95 confirms that new developments must ensure that flood risk is addressed to flood depths for a 1 in 100-year storm event plus climate change in line with Environment Agency guidance. The drainage strategy must demonstrate that development proposals will remain safe during a flood event throughout its lifetime and consider access, egress and emergency exit routes.

5. Design and Access Statement

- 5.1.1 The proposed works include site preparation and the installation of a concrete flood defence barrier consisting of replacement of existing concrete kerb with up to 450mm concrete kerb and installation of new raised kerb.
- 5.1.2 The positioning of the flood defence barrier seeks to make use of existing hardstanding and concrete infrastructure where possible and has been sited over 10 metres away from the river bank to minimise ecological impacts. The proposed development will provide a vital piece of flood defence infrastructure where it is needed.

5.2. Design

- 5.2.1 The alignment of the proposed flood defence barrier extends to approximately 490 metres in length with a maximum height of 450mm.
- 5.2.2 The proposed strategy to improve flood resilience comprises several elements:
- Replacement of existing kerbs with higher, vehicle-containment kerbs;
 - Installation of sheet piling and a shallow flood defence across open land and around the electricity substation;
 - Flood gates at access points, forming a continuous line of defence alongside the Weston Cut.
- 5.2.3 The alignment of the proposed flood defence barrier extends to approximately 490 metres in length with a maximum height of 450mm.
- 5.2.4 These measures are designed both to improve site safety and enhance the flood resilience of the factory. It is important to note that the main service yard will not be protected and will be allowed to flood during extreme events.
- 5.2.5 More detail is presented in the following drawings and reports prepared by Edenvale Young;
- Flood Risk Assessment
 - EVY1164-003 – Flood Resilience – Sections
 - EVY1164-001 – Flood Resilience – General Arrangement – Sheet 1
 - EVY1164-001 – Flood Resilience – General Arrangement – Sheet 2

5.3. Access

- 5.3.1 Vehicular and pedestrian access is not affected by the proposed development.

6. Pre-app engagement with Environment Agency

- 6.1.1 The applicant team and their flood risk engineers, Edenvale Young, sought Pre-application advice from the Environment Agency in April 2025 with respect to the emerging hydraulic model. At the time of writing, feedback from the Environment Agency is expected by the end of August 2025.

7. Planning Considerations

- 7.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 confirms that planning applications should be determined in accordance with the Development Plan unless material circumstances indicate otherwise. In this section, the planning issues raised by the proposed development are considered against the prevailing planning policy framework and the associated Development Plan. This section identifies any material considerations that should also be considered as part of the proposed development. In doing so, it demonstrates the planning rationale for the proposed development, and why planning permission should be granted.
- 7.1.2 Having established the site conditions, the prevailing planning policy framework and the likely effects arising from the proposed development, the main planning issues raised by this application are considered within the remainder of this section under the following headings:
- Principle of Development
 - Flood Risk
 - Amenity

7.2. Principle of Development

- 7.2.1 Tackling the effects of climate change, addressing flood risk and increasing flood resilience, as well as safeguarding open space and recreation have widespread support at national and local level.
- 7.2.2 The Wiltshire Core Strategy sets out that climate change remains a key issue for the Local Plan to address. This can be achieved through supporting schemes that seek to promote more sustainable forms of transport, sustainable construction methods, the delivery of low carbon and renewable energy, increases and enhancements to green infrastructure, and ensuring that development is adequately protected from flood risk.
- 7.2.3 The proposed development seeks planning permission for minor interventions to provide robust flood resilience measures and improve site safety and enhance the flood resilience of the factory. The proposed development is therefore entirely consistent with the objectives of local and national planning policy.

7.3. Flood Risk

- 7.3.1 A Flood Risk Assessment prepared by Edenvale Young is submitted in support of this application for full planning permission. The assessment outlines the flood risk implications associated with this area of the factory campus and how the proposed development will mitigate the risk.
- 7.3.2 The proposed measures are Water Compatible and have been located outside of the modelled 1% AEP plus 26% allowance for climate change. They will therefore result in no loss of floodplain storage during an event larger than the Design Flood, or increase flood risk elsewhere. During the fluvial Design Flood they will not increase flood risk elsewhere as there will be no interaction with flood water.
- 7.3.3 The proposed flood resilience measures would remove the factory site from Flood Zone 3 by providing significant protection from future flood events, whilst still maintaining a functional flood plan for the River Avon when needed. The defences constitute water compatible development, which is deemed appropriate to be located within zones 3a and 3b.

- 7.3.4 With the above in mind, the proposed development is therefore fully compliant with national planning policy and policies 67 (Flood Risk) and 68 (Water Resources) of the adopted Wiltshire Core Strategy.

7.4. Amenity

- 7.4.1 The proposed flood resilience measures have been designed to minimise land take by re-using existing hard standing for the most part and by being positioned on the periphery of the factory campus. With a max height of 450mm above ground level, the interventions are minor in nature and would not have a detrimental impact upon visual amenity.
- 7.4.2 Construction works have the potential to result in some limited noise, dust and vibration impacts due to activities associated with plant use and construction vehicle movements. However, these impacts are likely to be localised and temporary in nature over the duration of the daytime only construction works. Hence, any associated air quality or amenity impacts are not considered significant. Nonetheless, should the Council consider it necessary, a suitably worded condition could be attached requiring the submission of a Construction Management Plan to ensure noise, dust and vibration are kept to a minimum.
- 7.4.3 Overall it is considered that the proposed development will accord with Policy 57 (High Quality Design) of the adopted Wiltshire Core Strategy.

8. Conclusions

- 8.1.1 The proposed development will provide a substantial benefit to ongoing food manufacturing operations at the CPUK campus through increased flood resilience, whilst not increasing the risk of flooding elsewhere.
- 8.1.2 The design has been carefully considered to make use of existing of existing kerblines and hardstanding where possible. Modelling was undertaken to demonstrate that this kerbing would be safe, without increasing flood risk elsewhere. The following conclusions can be drawn:
- Kerb replacement is proposed at the CPUK site in Staverton, Wiltshire to provide precautionary flood resilience measures.
 - The site has been subject to historic flooding and it is shown to have been subject to fluvial flooding, but CPUK have no record of this affecting the southern part of the site.
 - Review of Environment Agency and local data indicate that the site is at low risk of surface water flooding.
 - The site is in an area of possible groundwater emergence and reservoir inundation. Neither of these risks of flooding are considered relevant to the current proposals.
 - Flood control infrastructure is proposed to protect the existing buildings on the site in extreme events. This is considered as Water Compatible development and is appropriate to protect the site - the buildings FFL are above the predicted flood level and defences.
 - Site-specific hydrological and hydraulic modelling has been undertaken to provide a detailed picture of fluvial flood risk at the site and to inform the placement and height of the proposed flood control infrastructure.
 - It has been demonstrated that the proposed measures will meet the requirements of the NPPF and the provisions of the adopted Wiltshire Core Strategy.
- 8.1.3 There is widespread policy support for tackling the effects of climate change and improving flood resilience nationally and in Wiltshire. This requires appropriate flood infrastructure to be delivered in the right place in order to be effective.
- 8.1.4 The technical assessments that have been prepared in support of the planning application have demonstrated that there will be no adverse impacts on flood risk, amenity, pollution and the landscape and appearance of the area. Given the above, it is considered that the proposed development is in accordance with the adopted Wiltshire Core Strategy and would deliver substantial benefits to the ongoing operations of Cereal Partners UK.

STRIDE TREGLOWN

Name

+44 (0)117 974 3271
name@stridetreglown.com

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