

WILTSHIRE POLICE
HQ, DEVIZES
QUAKERS WAY

BIODIVERSITY NET
GAIN
REPORT



Ecology
Archaeology
Arboriculture
Landscape Architecture

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1. EXECUTIVE SUMMARY

- 1.1. In July 2025, ACD Environmental Ltd were commissioned by Wiltshire Police to conduct a Small Sites Biodiversity Metric on an area of land at the Police Head Quarters in Devizes; hereafter referred to as 'the Application Site'.
- 1.2. The Application Site comprises approximately 2628m² of land, which predominantly supports improved grassland with a line of mature trees along the western boundary and a native hedgerow with trees along the northern boundary.
- 1.3. The development proposals are for an emergency access road from the northern boundary off of Quakers Road. The track will consist of a ground reinforcing paving tile such as Cell Pave AP.
- 1.4. The Small Sites Biodiversity Metric has been used to measure and account for biodiversity losses and gains as a result of the proposed development. The results of the Metric can be summarised as follows:

On site baseline	Habitat Units	1.0512
	Hedgerow Units	0.7360
On site post intervention	Habitat Units	1.1924
	Hedgerow Units	0.8346
Total net unit change	Habitat Units	0.1412
	Hedgerow Units	0.0986
Total net % change	Habitat Units	13.43%
	Hedgerow Units	13.40%

- 1.5. The proposed development will currently result in a 13.43% gain in habitat units and a 13.40% net gain in hedgerow units.
- 1.6. The Baseline Habitat Plan and Habitat Creation Plan are shown in **Appendix 1** and **Appendix 2** respectively.

- 1.7. Measures to address the loss of modified grassland habitat and the section of native hedgerow with trees, have been explored within the Application Site. These include the planting of 47m of native species rich hedgerow, planting of four trees and the enhancement of 1300m² of modified grassland to 'good' condition 'other neutral grassland'.

2. INTRODUCTION

Introduction

- 2.1. In July 2025, ACD Environmental Ltd were commissioned to conduct a Small Sites Biodiversity Metric of a site located at Wiltshire Police Headquarters in Devizes (OS Grid Reference: SU 01135 62028).
- 2.2. The Application Site is located off of Quakers Road, in the town of Devizes, Wiltshire. The Application Site comprises 2628m² of land which predominantly supports modified grassland. There are also linear habitats within the Application Site, comprising of a line of trees and a native hedgerow with trees. The line of trees is due to be retained.
- 2.3. The Application Site is part of the Wiltshire Police Headquarters and there are buildings to the east, a road and housing to the north and sports pitches to the south and west. Devizes town makes up the wider landscape with the canal to the east/south and there are arable fields beyond this.
- 2.4. The Application Site is shown in Image 1.



Image 1: Application Site location and approximate boundary shown in red¹.

¹ Map data, Google 2024

Context

2.5. The development proposal is for an emergency access road, which will form part of a submitted planning application to Wiltshire Council.

Purpose

2.6. The purpose of this assessment is to:

- Evaluate the habitats found onsite
- Discuss the results of the preliminary roost assessment on the trees.
- Determine the impact of the development on biodiversity by:
 - Establishing the theoretical value of biodiversity within the Application Site before and after development.
 - Assessing how the value of biodiversity within the Application Site would change following development.
- Make detailed design recommendations to maximise opportunities for biodiversity on-site and where required, establish the parameters of any biodiversity offsetting.

3. METHODOLOGY

Names and qualifications of surveyors

- 3.1. This report was prepared by Lisa Durrant. Lisa has thirteen years' experience working for commercial consultancy and specialises in European Protected Species (EPS) legislation and mitigation, holding licences for bats (level 2) barn owl *Tyto alba*, great crested newts *Triturus cristatus* and hazel dormouse *Muscardinus avellanarius*. Lisa has significant experience of EclA and is a Full Member of the Chartered Institute of Ecology and Environmental Management (MCIEEM).
- 3.2. A Technical Review of this report has been undertaken in line with ACD Environmental Ltd's Quality Assurance procedures. The Technical Review was undertaken by Dominic Lambert. Dominic has experience carrying out a variety of surveys including but not limited to Extended Phase 1 Habitat Surveys and UK Habitat Classification Surveys, Preliminary Roost Assessments (PRAs) and is experienced in the use of Biodiversity Metrics and Ecological Impact Assessments (EclAs) and also works in a voluntary capacity for the Wiltshire Mammal Group as the otter champion. Dominic is a Qualifying member of the Chartered Institute of Ecology and Environmental Management (CIEEM).

Habitat Survey

- 3.3. The Application Site was surveyed originally in 2023 by Cotswold Ecology, then on 23rd July 2025, with a walkover survey done by ACD Environmental Ltd. The Application Site comprises of modified grassland which is regularly mown and used for exercising/training police dogs, with a native hedgerow with trees along the northern boundary and a line of protected mature maple trees along the western boundary. Habitats are described in more detail below.
- 3.4. The data from the site visit was interpreted by ACD Environmental Ltd and classified with reference to the UK Habitat Classification System (UKHab)² and input into the Small Sites Biodiversity Metric.
- 3.5. Using the above method, the Application Site was assessed for the habitat types it supports and their importance in a local context.

² UKHab (2023). UK Hab V2. Available at: <https://ukhab.org/>

Limitations and Precautionary Approach

- 3.6. The site visit was undertaken during July, usually an optimal month for vegetation surveys, however due to drought conditions the grassland was very dry which makes plant identification difficult. This has been taken in consideration when assessing habitat conditions, which may not be typical due to the drought. Due to the type of habitat present, along with the previous survey information from 2023, this is not seen a major limitation as it is highly unlikely that any significant species will have been missed. The land use and management regime has not changed since 2023 and it is unlikely that the habitat would have changed considerably within that time scale.
- 3.7. Professional judgement was used by ACD Environmental Ltd and justification for the habitat's conditions will be evidenced where required.

Calculator Tool

Assessment Framework

- 3.8. For the purposes of this assessment, the Small Sites Biodiversity Metric has been utilised. The Small Sites Biodiversity Metric is accompanied by a 'Calculation Tool'. This was used to calculate the biodiversity units for the Application Site before and after development. The assessment was conducted using the criteria set out within the Natural England guidance document³.

Habitats - Linear

- 3.9. Three linear features were recorded on the Application Site. These were mapped using QGIS and measured to the nearest meter in length.
- 3.10. The measurements were taken using aerial imagery and informed by the survey. The locations of these linear habitats are shown in Appendix 2.

Habitat Measurements

- 3.11. Baseline habitat measurements were carried out in line with the results of the site survey. Measurements were calculated using QGIS mapping software.

³ Biodiversity small sites metric: *Small Sites Metric - User Guide*. Natural England. Available at: <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides>

3.12. Proposed habitat measurements were calculated from the Proposed Soft Landscaping Plan produced by ACD Environmental Ltd (2025), which is shown in **Appendix 3**. These proposals were georeferenced using QGIS⁴ mapping software and KeySCAPE Ltd⁵.

3.13. Measurements were entered to the nearest 0.01 metre square in area.

Distinction Assessments

3.14. Habitats are assigned to distinctiveness bands automatically within the Metric. These are based on an assessment of the distinguishing features of a habitat or linear feature, including the consideration of species richness, rarity (at local, regional, national and international scales), and the degree to which a habitat supports species rarely found in other habitats.

3.15. The distinctiveness band of each habitat is preassigned in the Biodiversity Metric. The bands are based upon the UK Habitat Classification system. A combination of simple rules and professional judgement have been used to assign each habitat type to the appropriate distinctiveness band. The distinctiveness categories used are tailored to habitat type.

3.16. Distinctiveness Assessments are assigned according to **Table 1**.

Table 1: Distinctiveness Assessment.

Category	Scores	Multiplier
Very High	8	Priority habitats as defined in Section 41 of the Natural Environment and Rural Communities (NERC) Act that are highly threatened, internationally scarce and require conservation action e.g. blanket bog
High	6	Priority habitats as defined in Section 41 of the NERC Act requiring conservation action e.g. lowland fens
Medium	4	Semi-natural habitats not classed as a Priority Habitat but with

⁴ QGIS (2024). Geographic Information System Software. Available at: <https://www.qgis.org/>

⁵ KeySCAPE Ltd (2024). KeySCAPE – Landscaping Software. Available at: <https://www.transsoftsolutions.com/uk/civil-and-transportation/software/landscape-design/keyscape/>

Category	Scores	Multiplier
		significant wildlife benefit e.g. mixed scrub
Low	2	Habitat of low biodiversity value e.g. temporary grass and clover ley
Very Low	0	Little or no biodiversity value e.g. hardstanding or sealed surface

Proposed Target Condition Assessments

- 3.17. Proposed habitats will have a different ecological target condition. The Metric therefore takes account of variation in habitat target conditions.
- 3.18. Condition Assessments are assigned according to Table 2. Habitat Condition was assessed using the criteria set out within the Natural England guidance document.

Table 2: Condition Assessment.

Category	Score
Good	3
Fairly Good	2.5
Moderate	2
Fairly Poor	1.5
Poor	1

Strategic significance

- 3.19. The spatial location of a habitat is treated as a component of the quality of a habitat parcel in the same way as distinctiveness or condition. Strategic significance is used to determine whether the habitat is of increased importance due to its location.

4. ASSESSMENT

Context

- 4.1. The Application Site is located off of Quakers Road, in the town of Devizes, Wiltshire and is part of the Wiltshire Police Headquarters. The Application Site comprises approximately 2628m² of land, which predominantly supports improved grassland.
- 4.2. The two linear habitats within the Application Site consist of a line of mature maple trees along the western boundary and a native hedgerow with trees along the northern boundary. The line of trees is due to be retained.

Baseline Survey Results

Habitats

- 4.3. Locations of habitats can be found in the Baseline Habitats Plan at **Appendix 1**. Site photographs can be found in **Appendix 4** of this report. All habitats are set to be lost unless stated otherwise.

Modified grassland

- 4.4. There is currently a total of 2628m² of modified grassland within the Application Site divided into sections with Heras fencing. During the survey in 2023 this grassland comprised of areas dominated by rye grass *Lolium sp.*, Yorkshire fog *Holcus lanatus*, creeping bent *Agrostis stolonifera*, barren brome *Anisantha sterilis* and Timothy *Phleum pratense*. There is a good herb element present in places including species such as yarrow *Achillea millefolium*, daisy *Bellis perennis*, common mouse-ear *Cerastium fontanum*, spear thistle *Cirsium vulgare*, dove's-foot crane's-bill *Geranium molle*, red dead-nettle *Lamium purpureum*, creeping buttercup *Ranunculus repens*, broad-leaved dock *Rumex obtusifolius*, common ragwort *Senecio jacobaea*, groundsel *Senecio vulgaris*, perennial sow-thistle *Sonchus arvensis*, common sow-thistle *Sonchus oleraceus* and common dandelion *Taraxacum sect. Ruderalia*.
- 4.5. This section of grassland is used for recreational activities and police dog training. The grassland has a similar composition in 2025 to that described but with false oatgrass *Arrhenatherum elatius* and cock's-foot *Dactylis glomerata* notable and annual meadow grass *Poa annua* and red fescue *Festuca rubra* also recorded. Common plants were also recorded including ribwort plantain *Plantago lanceolata*, broad-leaved dock, common dandelion, common ragwort and cow parsley *Anthriscus sylvestris*.

- 4.6. The species diversity was more limited in appearance than in 2023, however this may have been related to the drought conditions during the 2025 survey.
- 4.7. The grassland meets the criteria of 'modified grassland' with no more than 8 species per square meter present but has a good diversity of herb species in places. In some places the grassland is varied in sward height being longer around the base of the line of trees but in most areas, it is uniform and regularly mown short. Being used as a dog training area/exercise area decreases its condition slightly due to damage and due to the drought conditions the grassland was patchy and dry and the condition was reduced further. Under non-drought conditions it is likely that the habitat passes at least five criteria of the condition assessment making it at least 'moderate' condition.
- 4.8. Some of this habitat is due to be lost to facilitate the new access road (1295m²), a strip along the tree line will be retained and enhanced (1300m²).



Photograph 1 & 2: Modified grassland

Line of trees

- 4.9. There is a line of large, mature trees on the northern boundary consisting of Beech *Fagus sylvatica* and copper beech *Fagus sylvatica purpurea*. The line of trees is approximately 130m long.
- 4.10. The line of trees was considered to have 'moderate' condition score due to passing four of the condition criteria. This habitat will be retained within an enhanced buffer zone.



Photograph 3 & 4: Line of trees

Native hedgerow with trees

- 4.11. There was a native hedgerow with trees running along the northern boundary. This hedgerow consists of mainly hornbeam *Carpinus betulus* with field maple *Acer campestre* and hawthorn *Crataegus monogyna* and the occasional small beech tree.
- 4.12. The hedgerow is assessed as 'moderate' condition due to failing three of the condition criteria.
- 4.13. Three small beech trees and a 27m section of the hedgerow will be removed to form the access point.



Photograph 5 & 6: Native hedgerow with trees

Proposed development

Habitats Review

4.14. The following habitats are proposed as part of the redevelopment of the Application Site:

- Artificial unvegetated, unsealed surface (access track)
- Other neutral grassland (enhanced)
- Urban tree; newly planted
- Species rich native hedgerow

4.15. Locations of proposed habitats can be found in the Habitat Creation Plan at **Appendix 2**.

Artificial unvegetated, unsealed surface

4.16. The access track will consist of reinforced grid e.g. 'CellPave' system, as supplied by GroundTrax or similar. The area will be 1295m².

4.17. This habitat is allocated a pre-determined fixed condition score within the Metric. Therefore, due to their lack of biodiversity value it is assigned as **Condition Assessment 'N/A'**.

Other neutral/ Wildflower seed mix

4.18. An area of 1300m² under the canopy of the line of trees will be seeded with 'Pro Woodland' and Shaded Areas wildflower mix, as supplied by John Chambers or similar, and sown at 1-2 g/m² and also Heritage Butterfly Meadow the grassland will be enhanced from modified grassland to other neutral grassland.

4.19. The area will be managed to achieve a **'good' target condition** with infrequent cutting and management of the grass at a variable sward height. Any invasive plants or scrub encroachment will be removed and reseeded of any areas periodically to maintain a good diversity of species. There will be no/minimal disturbance/footfall within this area.

Urban trees

4.20. A total of 4 small trees will be planted with the new scheme. These will be 1 x *Quercus*

robur, 2 x *Tilia cordata* and 1 x *Fagus sylvatica*. These trees are considered to achieve a **Moderate Target Condition**.

Species Rich Native hedgerows

- 4.21. A native hedgerow (47m) is proposed with the new development along the access road. Proposed species-rich mixed native hedge planting to be planted in a double staggered row 300mm apart and at 400mm centres in each row. To be maintained at 1m height and 1.8m height adjacent to site boundaries.
- 4.22. Mixed native hedgerow will include *Acer campestre*, *Crataegus monogyna*, *Carpinus betulus*, *Fagus sylvatica* and *Malus sylvestris*. This hedgerow is considered to achieve a **Moderate Target Condition**.

5. RESULTS AND EVALUATION

- 5.1. The linear features are likely to be of importance to foraging and commuting bats. Thus, precautions during the construction and operational phases of the development shall be followed in order to limit any adverse effects on bat populations that may utilise the boundary hedgerows and lines of trees such as a sensitive lighting scheme. The retained line of trees and remaining hedgerow must be protected at all times during works.
- 5.2. These features may also be utilised by birds for nesting; therefore, precautionary measures must be taken to limit disturbance on nesting birds, with work to remove any of these features to take place outside of the nesting bird season.
- 5.3. The grassland and hedgerow can also provide habitats for reptiles and amphibians and therefore, care must be taken when removing these. It is recommended that the grassland area that is to be removed should be maintained as a short-mown area to ensure that it doesn't become suitable for reptiles/amphibians. Any root removal of hedgerow should be undertaken outside of the hibernation season for reptiles and amphibians to avoid harm to individuals that could be hibernating in these areas.
- 5.4. It is important to note that the Metric does not explicitly deal with fauna. Instead, it uses habitat types as a proxy for the biodiversity 'value' of the species communities that make up those different habitats and its results must be considered in conjunction with other measures. To this end it is recommended that 2 x Schwegler 2F bat boxes and 2 x Vivara Pro Seville general bird boxes are mounted on the line of mature trees.
- 5.5. The full results of the Metric have been provided separately as an Excel document. Assessor comments have been added where they are deemed necessary to provide reasoning or justification for certain aspects of the calculation. A summary of results can be found in Table 3 below.

Table 3: Summary of Results

On site baseline	Habitat Units	1.0512
	Hedgerow Units	0.7360
On site post intervention	Habitat Units	1.1924
	Hedgerow Units	0.8346
Total net unit change	Habitat Units	0.1412
	Hedgerow Units	0.0986
Total net % change	Habitat Units	13.43%
	Hedgerow Units	13.40%

5.6. The proposed development will result in a 13.43% gain in habitat units and a 13.40% net gain in hedgerow units. For further details please refer to the Small Sites Metric. Both meet the 10% net gain targets.

6. CONCLUSION

- 6.1. The proposed development will result in a 13.43% gain in habitat units and a 13.40% net gain in hedgerow units. The loss of the area of modified grassland will be compensated for, by the enhancement of remaining grassland with wildflower seed mix and the loss of a section of native hedgerow with trees and will be compensated for by the planting of new native species rich hedgerow and four native trees.
- 6.2. Measures to achieve a further net gain have been detailed within the report. The inclusion of native species is recommended within the horticultural aspect of the proposed development to encourage an abundance of native fauna such as important pollinators.
- 6.3. Additionally, bird and bat boxes are advised to be installed within the Application Site. This is to enhance the site for local and commuting faunal species through the vicinity. Recommended boxes are two Schwegler 2F bat boxes and two Pro Seville Woodstone Nest Boxes (or similar). The bat boxes should be placed in a southerly orientation at a height of between 3m to 6m in an open sunny position. The bird boxes should be in a northerly orientation between 1.5m and 3m.
- 6.4. The Application Site holds potentially suitable habitats for bats, nesting birds, reptiles and amphibians, such as trees, hedgerows and grassland, therefore, precautions must be taken during the removal of such habitats and measures taken to protect retained habitats.
- 6.5. The proposed development will be in accordance with the Policy criteria set out in Wiltshire Core Strategy (2015-2026) to achieve a 10% net gain and will be in accordance with the NPPF.

APPENDIX 1: BASELINE HABITATS PLAN



APPENDIX 2: HABITAT CREATION PLAN







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