



**Melksham Community Hospital
Preliminary Ecological Appraisal Report
and Biodiversity Net Gain Approach
NHS Property Services Ltd.
10 November 2025**



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1 Introduction

1.1 BACKGROUND

- 1.1.1 This report presents the findings of a Preliminary Ecological Appraisal (PEA) for the habitats present within an area of Melksham Community Hospital, Spa Road, Melksham, Wiltshire SN12 7NZ. The site is centred on ordnance survey grid reference ST 90931 63174 and the site location is shown in Figure 1. The desk study and survey work were carried out by Davidson-Watts Ecology Ltd on behalf of NHS Property Services Ltd.
- 1.1.2 The site is 0.2441 hectares (ha) and consists of the 'entrance' to the north of the hospital. The habitats are predominantly developed land in the form of car parks, roads, pavements, walkways and commercial buildings, as well as four small areas of modified grassland. An aerial view map with associated red line boundary is shown in Figure 2 and an existing site plan is shown in Figure 3.
- 1.1.3 The site sits in an urban landscape of largely built-up habitat with some amenity areas. It is situated in the south of Melksham town with residential housing on the north, east and south. Habitats immediately to the west include amenity grassland and small treelines and hedgerows that are somewhat connected to the wider landscape. Beyond the immediate urban landscape sits a mosaic of arable, pasture and some woodland habitats. The River Avon is approximately 1.1 km to the northwest of the site and the Kennet and Avon Canal is approximately 2.1 km south.
- 1.1.4 The proposed development consists of the reconfiguration of the site entrance. This involves new car-parking and vehicle/pedestrian access. Plans of the proposed development are shown in Figure 4.

1.2 OBJECTIVES

- 1.2.1 From 2nd April 2024, Biodiversity Net Gain became mandatory for all small developments under The Environment Act 2021 (Commencement No. 8 and Transitional Provisions) Regulations 2024 (with some exclusions). In England, biodiversity net gain is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). This is referred to as biodiversity net gain in Planning Practice Guidance to distinguish it from other or more general biodiversity gains.
- 1.2.2 Biodiversity net gain has been defined as 'development that leaves biodiversity in a better state than before, and an approach where developers work with local governments, wildlife groups, landowners and other stakeholders in order to support their priorities for nature conservation' (Baker, 2016).
- 1.2.3 The objectives of the report are to:
- ☐ To identify and describe all potentially significant ecological impacts associated with the proposed development on ecologically important features,
 - ☐ To determine the requirement, if any, for further survey effort that will inform any subsequent mitigation measures necessary to ensure compliance with nature conservation legislation.
 - ☐ To identify appropriate enhancement measures, and

- To Identify how Biodiversity Net Gain could be achieved in line with national legislative requirements.

2 Methodology

2.1 DESK STUDY

- 2.1.1 The purpose of the desk study is to review information available in the public domain. The following sources were checked for ecological information relating to a 2 km radius around the site boundary:

- Wiltshire and Swindon Biological Records Centre (WSBRC) (25th July 2025),
- Aerial mapping (Google Earth Pro), and
- MAGIC (Multi-Agency Geographical Information for the Countryside)
<http://www.natureonthemap.naturalengland.org.uk>.

2.2 FIELD SURVEY

- 2.2.1 The field survey of the site aimed to record both the habitat types present at the site as well as identify any evidence of protected and notable species (listed under Section 41 of the 2006 Natural Environment and Rural Communities (NERC) Act, Birds of Conservation Concern or locally notable species). This can be done by direct observation and through searching for field signs for each species. The survey was undertaken following 'Guidelines for Preliminary Ecological Appraisal: Second Edition' (CIEEM 2017).

2.3 ZONE OF INFLUENCE

- 2.3.1 The Zone of Influence (Zoi) is defined as 'the areas/resources that may be affected by the biophysical changes caused by activities associated with a project' (BCT, 2023).
- 2.3.2 The Zoi has been identified as the full extent of the site, i.e. all land within the red line boundary displayed in Figure 2. This has not been extended beyond the site, as any impacts of the proposed development are considered unlikely to expand beyond this due to the limited size and nature of the development.

2.4 HABITAT SURVEY

- 2.4.1 The field survey included a survey of all habitats located within the site. Attention was also given to any survey corridors that linked the site with other areas of ecological interest or value for protected and/or notable species. Ponds within 500 m (English Nature, 2001) were noted, especially where there were good habitat linkages with the site. Non-native invasive species were recorded where present on the site. Plant species follow nomenclature from Stace (2010).
- 2.4.2 The field survey of the site was conducted on the 15 July 2025. July is considered an optimal month to survey vegetation.
- 2.4.3 The dominant plant species were recorded and habitats classified according to their vegetation types and presented in the standard UK Habitat Classification (UKHab) survey methodology. This survey method aims to characterise habitats and communities present and is not intended

to provide a complete list of all plants occurring across the site. The abundance of species has been recorded with reference to the DAFOR scale:

- ☐ Dominant (D) >75%
- ☐ Abundant (A) 75 – 51%
- ☐ Frequent (F) 50 – 26%
- ☐ Occasional (O) 25 – 11%
- ☐ Rare (R) <10%

2.4.4 Habitats were classified to a minimum of level 4 in the UKHab hierarchy (Butcher et al 2020), with the minimum mappable area of 25 m² and 5 m length x 1 m width for linear features, corresponding to the minimum dimensions applicable for a BNG calculation. Where applicable, secondary habitat codes were also used.

2.4.5 Habitat maps were digitised using QGIS 3.34.5.

2.5 PRELIMINARY BAT ROOST ASSESSMENT

2.5.1 Two structures that were located within a previous iteration of the development site boundary were identified as having potential for roosting bats (Figure 8). While these buildings sit outside of the site current proposed boundary, the results of the preliminary bat roost assessment of these buildings are included in this report for reference.

External Survey

2.5.2 A systematic external search of all buildings within the Site was undertaken using binoculars, torches, mirrors or endoscopes as necessary to identify potential or actual resting places or bat access points (for example, loose or missing tiles; missing mortar at gable ends; hanging tiles or wooden cladding; raised lead flashing; gaps beneath the eaves; broken windows; damaged air vents and recesses in stonework). Characteristic field signs of bat presence, for example live or dead specimens, accumulations of droppings or obvious scratch/wear marks were also identified where possible. It should be noted that sometimes bats leave no visible signs of their presence and external signs can be washed away.

Internal Survey

2.5.3 A systemic search was undertaken of the interior of all buildings on site (where safely accessible) to identify the potential or actual bat access points and roosting places and to locate evidence of bats. Evidence of bats could include droppings, urine staining, fur-oil staining, feeding remains (for example, large accumulations of moth wings), and individual bats including squeaking. An endoscope, torch, mirror or close-focussing camera were used when required to enable closer inspection of potentially important features. It should be noted that sometimes bats leave no visible sign of their presence even on the inside of the building, particularly when hidden in cracks, crevices and voids. All torches were turned off to enable identification of potential roost access points through light spill.

2.5.4 Detail of internal structures, such as the presence and location of timber joists and other features supporting roost features, internal dimensions (width, length, height) of voids, the location of internal roosting points/opportunities and the location of access points. Any vegetation adjacent to the structure that could be used by emerging bats was also noted where

present. An assessment of the potential of the building to support roosts was then made in line with BCT guidelines (2023) shown in Table 1 below.

- 2.5.5 The survey was undertaken by Freja McCall-Stevenson MRSB under Natural England Class 2 bat licence number 2023-11746-CL18-BAT.

Table 1: Criteria for categorising buildings for their potential to support roosting bats (taken from Table 4.1 Collins, 2023).

Suitability	Description of building
None	No habitat features on site likely to be used by any roosting bats at any time of the year. No habitat features likely to be used for commuting or foraging at any time of the year.
Negligible	No obvious habitat features on site likely to be used by roosting bats, however a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis by a larger number of bats (i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site but could be used by individual hibernating bats). Habitats that could be used by a small number of bats as flight paths but not well connected to the wider landscape, or suitable, isolated habitat.
Moderate	A structure with one or more potential roost features that may be used by bats due to their size, shelter, protection, condition and surrounding habitat. Unlikely to support a roost of high conservation value (roost type only – hibernation or maternity). Continuous habitat connected to the wider landscape e.g. tree lines, linked back gardens, trees, scrub, grassland or water that could be used as flight lines or for foraging.
High	A structure with one or more potential roost features that are suitable for use by a large number of bats on a regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat. Continuous high-quality habitat that is well connected to the wider landscape. Site close to and connected to known roosts.
Confirmed	Confirmed bat roost where bats are recorded as present or where evidence of use by bats has been recorded. Where there are multiple roost features present, a building may be confirmed as a confirmed roost, but also still have further suitability.

2.6 ECOLOGICAL EVALUATION AND SIGNIFICANCE

- 2.6.1 Ecological features and resources have been evaluated based on the approach described in 'Guidelines for Ecological Impact Assessment in the United Kingdom' published by the Chartered Institute of Ecology and Environmental Management (2019) whereby the value of an ecological feature or resource is determined within a defined geographical context using the following criteria:

- ☐ International,
- ☐ National (England),
- ☐ Regional (Southwest),

- ☐ County (or Metropolitan) (Wiltshire),
- ☐ District (or Unitary Authority, City or Borough) (West Wiltshire),
- ☐ Local (or Parish) (Melksham),
- ☐ Site; and
- ☐ Negligible

2.6.2 Significant ecological features have been determined as those valued above site level and/or where there are legal or planning policy obligations. Criteria have been applied as identified in CIEEM (2018) to evaluate the ecological features.

2.6.3 Consideration has also been given to any invasive species on Schedule 9 of the Wildlife and Countryside Act 1981 (e.g. Japanese knotweed *Fallopia japonica*, Himalayan balsam *Impatiens glandulifera* and giant hogweed *Heracleum mantegazzianum*) and as identified as injurious in the Weeds Act 1959 (as amended by the Ragwort Control Act 2003).

2.6.4 Ecosystem services including supporting services, provisioning services and cultural services are considered where relevant as well as the presence of natural capital and opportunities for enhancement to increase habitat value where they exist.

2.7 STATUTORY BIODIVERSITY NET GAIN APPROACH

2.7.1 Under the statutory framework for biodiversity net gain, every grant of planning permission is deemed to have been granted subject to a general biodiversity gain condition to secure the biodiversity gain objective. This objective is to deliver at least 10% increase in relation to the pre-development biodiversity value of the development granted permission. This increase can be achieved through onsite biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits.

2.7.2 The habitat condition assessment was undertaken using the Statutory Biodiversity Metric and Metric Condition Assessments, using technical advice from the Statutory Biodiversity Metric User guide.

2.7.3 The Draft Local Nature Recovery Strategy (LNRS) for Wiltshire and Swindon Wiltshire & Swindon Local Nature Recovery Strategy | Wiltshire Wildlife Trust was consulted to determine the strategic significance of the habitats on site. In addition, local biodiversity strategies, connectivity to statutory or non-statutory sites were reviewed as well as the potential to support protected or notable species and whether the site is identified in a local ecological network or stepping-stone strategy.

2.7.4 The opportunity exists for the creation or enhancement of habitats of the same or higher distinctiveness to replace non-irreplaceable habitats that are to be lost or impacted as a result of the development which is known as 'trading up'. This can only occur where environmental conditions are appropriate and where it generates the greatest benefit for biodiversity.

2.7.5 Good practice principles for biodiversity net gain are set out within Table 1.1 of Biodiversity Net Gain: Good practice principles for development (Baker et al., 2019). The key principles include Apply the 'Mitigation Hierarchy' (in line with CIEEM Guidelines for Ecological Impact Assessment (EcIA)) (CIEEM, 2018) and be 'additional' by achieving outcomes that exceed existing obligations.

- ☐ Avoid losing biodiversity which cannot be off-set elsewhere (e.g. irreplaceable habitats).

- Address risk (e.g. difficulty of achieving habitat creation / enhancement for net gain).
- Make a 'measurable' net gain contribution (e.g. calculated using an appropriate metric) and ensure that calculations consistent and transparent (i.e. limitations and assumptions are clearly identified).
- Ensure that net gain design achieves the best outcome for biodiversity (this may require both quantitative and qualitative assessment) and create a net gain legacy for long-term benefits.

3 Baseline Conditions

3.1 PROTECTED SITES

Statutory Sites

- 3.1.1 A desk-based search shows no statutory protected site within 2 km of the site. As such, statutory sites are not a constraint to the proposed works and are not discussed further in this report.

Non-Statutory Sites

- 3.1.2 A desk-based search shows one Local Wildlife Site (LWS) and one Wiltshire Wildlife Trust (WWT) Reserve within 2 km of the site.
- 3.1.3 Bristol River Avon LWS is located approximately 1.1 km to the northwest of the site at its closest point. This is one of the main river systems draining north-west Wiltshire.
- 3.1.4 Conigre Mead WWT is located approximately 1 km northwest of the site at its closest point. It is a small wet fen-meadow on the outskirts of Melksham and includes BAP Key (Priority) Habitats Lowland Fens, Ponds, and Wet woodland.
- 3.1.5 There are no green or blue corridor links between the site and Bristol River Avon LWS or Conigre Mead WWT. It is unlikely that there would be transfer of species between the protected sites and the site and the site is also unlikely to support habitats for which the protected sites are designated. The site largely consists of other developed land, heavily managed modified grassland, and scrub and therefore lacks habitat structure and diversity. As such, non-statutory sites are not a constraint to the proposed works and are not discussed further.

Bat Consultation Zones

- 3.1.6 The site is not within any Bat Consultation Zones. The site is located approximately 1.5 km outside the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC) Consultation Zone.

Habitats of Principal Importance

- 3.1.7 The desk study returned 18 records of one Habitat of Principal Importance (HPIs) listed on the Natural Environment and Rural Communities Act 2006 S41 types within 2 km of the site. This comprised of:
- Deciduous Woodland HPI: 18 parcels, the closest 300 m south of the Site.

- 3.1.8 There are no HPis within the site boundaries or immediately adjacent to the site. HPis are not a constraint to the proposed works due to the proximity of the site to deciduous woodland and lack of pollution pathways and are therefore not discussed further.

Wildlife Corridors

- 3.1.9 MAGIC, Google Earth Pro and OS Maps were checked, and these identified some wildlife corridors in the form of hedgerows and trees to the west of the site. The hedgerows and trees are partially fragmented but connect to grassland areas to the west of the site and a vegetated drainage ditch and wooded area to the south of the site. This connects with other small pockets of woodland further southwest. However, connectivity to the site is sub-optimal.

Aquatic Habitats

- 3.1.10 The desk study returned three waterbodies within 500 m of the site (Figure 5). These consist of a drainage ditch and a pond to the south, and a pond to the southwest.
- 3.1.11 The desk study returned several watercourses within 2 km of the site. The River Avon is located approximately 1.1 km northwest of the site at its closest point and there are several tributaries present, including Clackers Brook approximately 550 m north.
- 3.1.12 There is no aquatic habitats located within or adjacent to the site boundary and no aquatic habitats were hydrologically connected to the Site. As such, aquatic habitats are not a constraint to the proposed works, due to their distances from site, and the lack of pollution pathways present. However, appropriate pollution prevention measures should be adhered to during the works.

3.2 HABITAT SURVEY

- 3.2.1 The habitats within the survey area are summarised below in order of size (largest area to smallest area). A description of each UKHab habitat type with applicable secondary codes can be found in Appendix A and should be read with reference to the UKHab map (Figure 6) (Butcher et al, 2020b). Target notes of notable habitat features on site is provided in Figure 7.

The habitats recorded within the site were as follows:

- ☐ u1b6 Other developed land, and
- ☐ g4 Modified grassland.

- 3.2.2 There is a beech *Fagus sylvatica* hedgerow and 10 trees adjacent to the red line boundary (Appendix A).

3.3 INVASIVE NON-NATIVE SPECIES

- 3.3.1 The records search returned no records of Invasive Non-Native Species (INNS) within 2 km of the site. No INNS listed on Schedule 9 of the Wildlife and Countryside Act (WCA) were recorded within or adjacent to the site during the survey.

3.4 BATS

Records

3.4.1 The records search returned 194 records of bats within 2 km of the site within the last 10 years. 26 of these records related to roost count data. The records related to the following species:

- ☐ Barbastelle *Barbastella barbastellus*,
- ☐ An unknown bat species *Chiroptera* sp.,
- ☐ Serotine *Eptesicus serotinus*,
- ☐ An unknown *Myotis* species *Myotis* sp.,
- ☐ Daubenton's bat *Myotis daubentonii*,
- ☐ Whiskered bat *Myotis mystacinus*,
- ☐ Natterer's bat *Myotis nattereri*,
- ☐ Leisler's bat *Nyctalus leisleri*,
- ☐ Noctule *Nyctalus noctula*,
- ☐ Nathusius's pipistrelle *Pipistrellus nathusii*,
- ☐ Common pipistrelle *Pipistrellus pipistrellus*,
- ☐ Soprano pipistrelle *Pipistrellus pygmaeus*,
- ☐ Brown long-eared bat *Plecotus auritus*,
- ☐ Greater horseshoe bat *Rhinolophus ferrumequinum*, and
- ☐ Lesser horseshoe bat *Rhinolophus hipposideros*.

3.4.2 The closest record related to common pipistrelle 380 m northwest of the site.

3.4.3 Magic returned three EPS licences for bats within 2 km of the Site within the last 10 years. These related to:

- ☐ 2015-14691-EPS-MIT located approximately 500 m southwest of Site and involved the destruction of a resting place for common pipistrelle brown long-eared *Plecotus auritus* and serotine *Eptesicus serotinus* bats between 2015 and 2025.
- ☐ 2017-31272-EPS-MIT located approximately 1 km southwest of Site and involved the destruction of a resting place for common pipistrelle and brown long-eared bats between 2017 and 2018.
- ☐ 2015-14789-EPS-MIT located approximately 1.8 km southeast of Site and involved the destruction of a resting place for common pipistrelle bats between 2015 and 2020.

Commuting and Foraging Habitat

3.4.4 There is no habitat of notable value for foraging and commuting bats present within the site boundary.

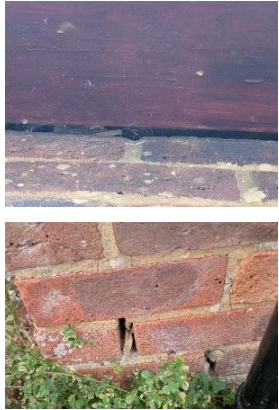
3.4.5 There is foraging and commuting habitat offsite to the west and south of the site that is partially connected to the wider landscape, including a network of grassland and associated hedgerows and treelines, and small broadleaved woodland belts.

Preliminary Bat Roost Assessment

- 3.4.6 Two structures that were located within a previous iteration of the development site boundary were identified as having potential for roosting bats. While these buildings sit outside of the site current proposed boundary, the results of the preliminary bat roost assessment of these buildings are included in this report for reference (Table 2). The suitability of each building for bats is shown in Figure 8.
- 3.4.7 Dusk emergence surveys were carried out for the two buildings. No bats were recorded to emerge from the buildings and the bat activity recorded was very low, consisting of very low numbers of common pipistrelle *Pipistrellus pipistrellus* passes at the edge of the site (Davidson-Watts Ecology 2025). The surveyor locations are shown in Figure 9.
- 3.4.8 There were no trees present within the Site boundary and none of the trees adjacent to the site boundary had features that were suitable for roosting bats.

Table 2: Preliminary bat roost assessment results

Building Number	Building description	External Inspection Results	Internal Inspection Results	Images of buildings
1	Single storey concrete-cast construction storage building with a corrugated metal flat roof and wooden fascia's/barge boards. Wooden-framed window on southern aspect. Metal double doors on northern aspect. Vents on southern aspect. Internally, there is plastic lining on the ceiling with tight-fitting timber battens. Visible fibre-glass insulation in places. Disturbed regularly as it's used as storage for hospital equipment. Externally lit to some extent by security lights and/or light spill from the adjacent car park and buildings.	Potential Roost Features (PRFs) include: Internal access via small vents on southern end. Gaps beneath wooden barge boards on all aspects.	No PRFs present internally.	  
2	Single storey electrical building of brick construction and a flat roof of bitumen sheeting. Wooden soffits present on all aspects. Double doors present on the western aspect, wooden-framed window present on the northern aspect and vents present on the eastern aspect with visible wooden board behind blocking internal access. Externally lit to some extent by security lights and/or light spill	PRFs include: Two small gaps in brickwork from missing mortar approximately 0.3 m from ground on southern aspect. Gaps beneath wooden soffits on northern,	No internal access.	

	from the adjacent car park and buildings.	southern and eastern aspects.		
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3.5 NESTING BIRDS

Records

- 3.5.1 The records search returned 1330 records for birds within 2 km of the Site within the past 10 years. These included the following nine species which could be reasonably expected to be present on Site:

- ☐ Dunnock *Prunella modularis*,
- ☐ Greenfinch *Chloris chloris*,
- ☐ House sparrow *Passer domesticus*,
- ☐ Mistle thrush *Turdus viscivorus* (red list),
- ☐ Song thrush *Turdus philomelos*,
- ☐ Whitethroat *Curruca communis*,
- ☐ Woodpigeon *Columba palumbus*, and
- ☐ Wren *Troglodytes troglodytes*.

Survey

- 3.5.2 There were some habitats within the site that hold value for nesting birds, in the form of scattered scrub and a bamboo stand. The scattered scrub within the eastern section of grassland 1 (Figure 6, Figure 7: TN5) holds the most value for nesting birds. Several birds were seen or heard during the survey, including great tit *Parus major* and blackbird *Turdus merula*, though no nests were observed.
- 3.5.3 No habitats were present that could support significant numbers of wintering birds, farmland birds or waterfowl.

3.6 HEDGEHOG

Records

- 3.6.1 The records search returned 545 records of hedgehog *Erinaceus europaeus* within 2 km of the site within the last 10 years. The closest record was approximately 60 m northeast of the site.

Survey

- 3.6.2 No evidence of hedgehog was discovered within the survey area during the field survey, though there were suitable habitats on site to support hedgehog. The grassland habitat within the site could provide foraging opportunities for hedgehog and the scattered scrub, particularly the eastern section of grassland 1 (Figure 6, Figure 7: TN5) could provide shelter.

3.7 OTHER

- 3.7.1 There were numerous records for other protected and notable species for the surrounding 2 km. However, there were no suitable habitats present on site. The site largely consists of developed land in the form of car parks, roads, pathways and small areas of modified grassland. The site is also frequently disturbed by regular mowing and foot traffic. Therefore, any other protected and notable species are highly unlikely to be present within the site and are discounted hereafter.

3.8 SURVEY CONSTRAINTS

- 3.8.1 All areas of the site were fully accessible for the habitat survey and the time of year, and weather conditions were suitable for undertaking the survey work.

4 Evaluation

4.1 HABITATS

- 4.1.1 g4 Modified grassland is not listed as an HPI within the NERC Act or as a priority habitat within the Wiltshire LBAP. This habitat does provide limited foraging opportunities for hedgehog. However, it is intensively managed and therefore of ecological value at the Site level only and not a constraint to the proposed works.
- 4.1.2 u1b6 Other developed land is not listed as an HPI within the NERC Act or as Priority Habitats within the Wiltshire LBAP and is of negligible ecological value. As such, this habitat is not a constraint to the proposed works.
- 4.1.3 There is some scattered scrub present on site which is suitable for nesting birds and sheltering hedgehog. Habitats suitable for nesting birds (hedgerow, trees) and hedgehog (hedgerow) are also present immediately adjacent to the site boundary.

Habitat Summary

- 4.1.4 A summary of habitat types, their ecological importance in terms of the CIEEM geographical frame of reference, and associated areas (in hectares) are provided within Table 3 below.

Table 3: Summary of habitats within the Site

Habitat type	Habitat area (ha)	Importance
Modified grassland (4 areas)	0.0735	Site
Developed land; sealed surface (other developed land)	0.1706	Negligible

4.2 BATS

Roosts

- 4.2.1 There are buildings adjacent to the site that have potential for roosting bats. It is understood that these buildings are being retained and there will be no loss of PRFs as a result of the proposed development. However, there may be additional noise and light spill during construction and post-construction.
- 4.2.2 Bats are legally protected against disturbance, injury or killing. Their places of shelter are protected against damage or destruction. Therefore, any works that could disturb, kill or injure bats would have legal implications.
- 4.2.3 Building 1 (Figure 8) has been classified as low suitability for roosting bats. It contains a small number of potential roost sites that could be used by individual bats opportunistically at any time of the year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis by a larger number of bats (i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site but could be used by individual hibernating bats).
- 4.2.4 Building 2 (Figure 8) has been classified as a precautionary moderate suitability for roosting bats, as there was no internal access at the time of the survey. It contains several potential roost features that may be used by small numbers of bats due to their size, shelter, protection, or condition. However, building 2 is unlikely to support a roost of high conservation value (hibernation or maternity). It does not contain features that could support classic hibernation of bats. The potential roost features did not provide the humidity or thermal stability required for a classic hibernation roost.
- 4.2.5 Further bat dusk emergence surveys (Davidson-Watts Ecology Ltd 2025) confirmed that there are no bats roosting in these buildings and that the bat activity generally is very low and limited to <5 passes for common and widespread light tolerant species. Bats are therefore not considered to be a constraint to this development. No impacts are proposed on the offsite hedgerow and trees adjacent to the site.

4.3 NESTING BIRDS

- 4.3.1 A small amount of habitat has been identified within the site which could support nesting birds, in the form of scattered scrub. It is understood that the proposed works will include the removal of this habitat.
- 4.3.2 There is also opportunity for birds to nest in hedgerow, scrub and trees adjacent to the site.

- 4.3.3 All bird's nests are protected while actively breeding in the UK under the Wildlife and Countryside Act 1981 (as amended).

4.4 HEDGEHOG

- 4.4.1 There is potential for hedgehogs to forage in the modified grassland on site, and to shelter within the scattered scrub on site. There are also opportunities for sheltering hedgehog within the hedgerow and scrub habitats adjacent to the site. The proposed works include the removal of grassland habitats and some scattered scrub, resulting in a potential loss of foraging and sheltering habitat for hedgehog.
- 4.4.2 Hedgehogs are a Species of Principal Importance under the NERC Act S41 and within Wiltshire's LBAP. Hedgehogs are vulnerable to extinction the UK and their populations have faced significant declines over the past 20 years.

5 Planning Policy

5.1 NATIONAL PLANNING POLICY

- 5.1.1 The National Planning Policy Framework (NPPF) (12 December 2024) Chapter 15 outlines out how the planning system should contribute to and enhance the natural and local environment by protecting sites of biodiversity value, recognising wide benefits from natural capital, minimising impacts on and providing net gains for biodiversity. If a proposed development would result in significant harm to the natural environment, Site of Special Scientific Interest or irreplaceable habitats which cannot be avoided (through the use of an alternative site with less harmful impacts), mitigated or compensated for (as a last resort) then planning permission should be refused. Development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.
- 5.1.2 To minimise impacts on biodiversity and geodiversity, planning policies should identify and map components of the local ecological networks, including the hierarchy of sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat management, enhancement, restoration or creation, 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 (Paragraph 192).
- 5.1.3 The NPPF retains protection for Local Wildlife Sites which are clearly recognised in the framework as locally designated sites of importance for biodiversity (Paragraph 188). The policy provides the direction for local authorities to identify, map and protect these sites through local plans. The new policy also requires protection of Local Wildlife Sites to recognise the importance and the contribution that they make to wider ecological networks, as stated in the Government's own Natural Environment White Paper.
- 5.1.4 Planning principles to be applied include planning refusal if significant hard to biodiversity as a result of a development cannot be avoided, development can only take place where there are

adverse effects on a Site of Scientific Interest 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, 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 development whose primary objective is to conserve or enhance biodiversity should be supported especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate (Paragraph 193).

- 5.1.5 The Natural Environment and Rural Communities (NERC) Act came into force on 1st Oct 2006. Section 41 (S41) of the Act requires the Secretary of State to publish a list of habitats and species which are of principal importance for the conservation of biodiversity in England. The S41 list is used to guide decision-makers such as public bodies, including local and regional authorities, in implementing their duty under section 40 of the Natural Environment and Rural Communities Act 2006, to have regard to the conservation of biodiversity in England, when carrying out their normal functions. Fifty-six habitats of principal importance and 943 species of principal importance are included on the S41 list. These are all the habitats and species in England that were identified as requiring action in the UK Biodiversity Action Plan (UK BAP) and continue to be regarded as conservation priorities in the subsequent UK Post-2010 Biodiversity Framework. Bats are listed as priority species under the NERC Act 2006.
- 5.1.6 In England, biodiversity net gain is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). This is referred to as biodiversity net gain in Planning Practice Guidance to distinguish it from other or more general biodiversity gains.
- 5.1.7 Under the statutory framework for biodiversity net gain, every grant of planning permission is deemed to have been granted subject to a general biodiversity gain condition to secure the biodiversity gain objective. This objective is to deliver at least 10% increase in relation to the pre-development biodiversity value of the development granted permission. This increase can be achieved through onsite biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits. BNG will be measured using Defra's biodiversity metric and habitats will need to be secured for at least 30 years.

5.2 LOCAL PLANNING POLICIES

Wiltshire Core Strategy, adopted 2015

- 5.2.1 The Wiltshire Core Strategy details the following within Core Policy 50: Biodiversity and Geodiversity:

Protection

- 5.2.2 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.

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

Biodiversity Enhancement

- 5.2.4 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.

6 Recommendations

6.1 HABITATS

- 6.1.1 Appropriate pollution prevention measures must be implemented throughout the works.
- 6.1.2 Vegetation clearance should be kept to a minimum and should not exceed the stated amount. The areas to be cleared should be clearly marked to show only what is strictly necessary for the works to be undertaken. If the scope of the proposed development changes and additional vegetation trees will be impacted further surveys, habitat replacement and compensation may be necessary.
- 6.1.3 Consideration should be given to ensuring that the adjacent hedgerow and trees are protected from damage during the works in line with BS 5837:2012.

6.2 NESTING BIRDS

- 6.2.1 Vegetation clearance of scattered scrub should be kept to a minimum and should be avoided between March to August, inclusive where possible. This is the period when the majority of bird species breed (allowing for seasonal variations). It should be noted that some species can nest all year round, and some species nest early (e.g. dunnoek *Emberiza calandra*) or late.
- 6.2.2 Where vegetation clearance cannot be reasonably avoided between March and August, a pre-works nesting bird check should be undertaken by a suitably experienced ecologist. Works at other times of year should be assessed for their potential to support nesting birds. Active nests must be left in-situ with an appropriate buffer and left untouched until the young birds have fledged. Works can proceed when the nest is no longer in use, as confirmed by a suitably experienced ecologist.

6.3 HEDGEHOG

- 6.3.1 Vegetation clearance should be kept to a minimum. Working methods will need to consider the presence of hedgehogs during vegetation clearance.

- 6.3.2 To remove residual risks to hedgehogs, vegetation clearance works of the scattered scrub areas will be carried out in stages. The first cut should take the vegetation down to approximately 30 cm with arisings removed. This will allow any hedgehogs present to leave the site of their own accord. After at least 24 hours the remaining vegetation can be taken down to ground level.
- 6.3.3 All deep trenches and holes should be covered at night.
- 6.3.4 0.0507 ha of other neutral grassland will be created which will provide alternative foraging resources for local hedgehog populations.

6.4 ENHANCEMENT

- 6.4.1 In accordance with the provision of Chapter 15 of the National Planning Policy Framework (Conserving and Enhancing the Natural Environment) and Local Planning Policy, every effort should be made to enhance the biodiversity value of the site.
- 6.4.2 Options to enhance the site include (but are not limited to):
- ☐ Installation of bird nesting boxes and bat boxes onto trees adjacent to the site.
 - ☐ Planting of native trees, shrubs or native hedgerow adjacent to the site to increase connectivity around the site.
 - ☐ Introduce a staged mowing regime for any remaining grassland, to create a mosaic of varying sward heights and habitats with all arisings removed to reduce nutrient levels
 - ☐ Planting of native flowering plant species that benefit local invertebrates through a variety of nectar resources through the season.

6.5 LIFESPAN OF SURVEYS

- 6.5.1 Where the survey data is 18 months or older, it is likely that update surveys and reporting will be required for planning for EPSL licensing purposes as bats are highly mobile species (CIEEM 2019).

7 Biodiversity Net Gain Approach

7.1 ON-SITE BASELINE

- 7.1.1 The Statutory Biodiversity Metric has been completed for the onsite baseline habitats as taken from the development plans, and the habitat areas are shown in Figure 6. The habitat areas are as follows:

Habitat Areas

- ☐ Moderate condition Modified grassland g4 – 0.0288 ha,
- ☐ Poor condition Modified grassland g4 – 0.0447, and
- ☐ Developed land; sealed surface (Other developed land u1b6) – 0.1706 ha

- 7.1.2 Habitat condition assessments have been completed for the four areas of Modified grassland and have been submitted alongside this report.

7.2 ON-SITE PROPOSED DEVELOPMENT

- 7.2.1 The on-site proposed habitats, as illustrated in Figure 10, include:

- ☐ Moderate condition Other neutral grassland g3c – 0.0124 ha,
- ☐ Poor condition Other neutral grassland g3c – 0.0383 ha, and
- ☐ Artificial unvegetated, unsealed surface u1c – 0.0317 ha

- 7.2.2 The creation of moderate condition Other neutral grassland (Figure 10: Grassland 3) and poor condition Other neutral grassland (Figure 10: Grassland 1 & 2) is proposed in place of some of the existing Modified grassland, with a total area equating to 0.0507 ha. No Modified grassland will remain.

- 7.2.3 The creation of Artificial unvegetated, unsealed surface relates to the new parking bays, which will be permeable tarmac.

- 7.2.4 0.1617 ha of Developed land; sealed surface will be retained, which includes the remaining road, pavement and hardstanding.

- 7.2.5 The proposed moderate condition Other neutral grassland will be legally secured under a planning condition for 30 years and a planning condition would be set that will require a Biodiversity Gain Plan and accompanying Habitat Management and Monitoring Plan (HMMP).

7.3 HEADLINE BNG RESULTS

- 7.3.1 The above calculations equate to a **10.3% net gain** of habitat units with trading rules satisfied.

8 References

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Figure 1 Site Location Plan



Figure 2 Site Boundary

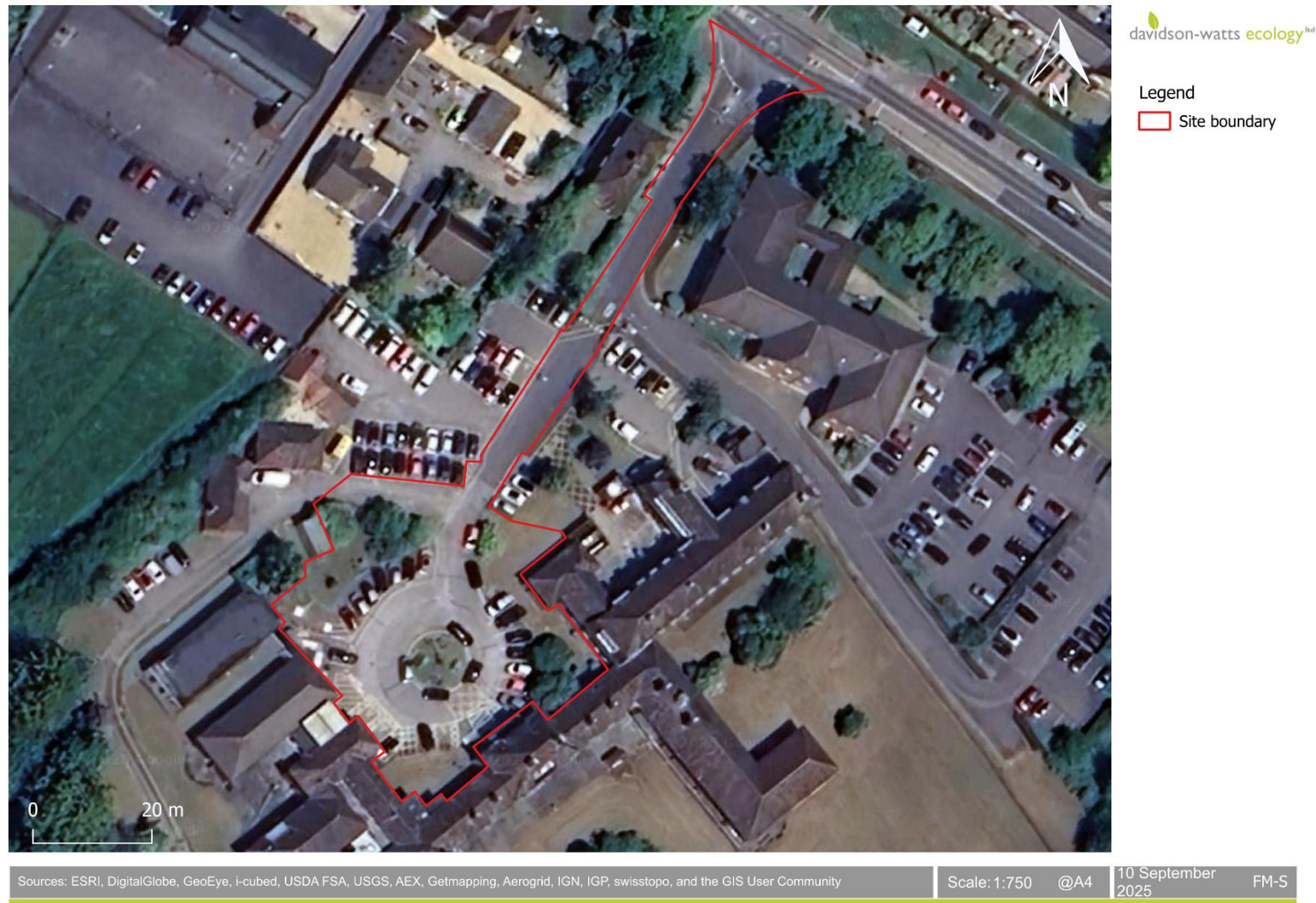


Figure 3 Existing Site Plan



Figure 4 Proposed Site Plan

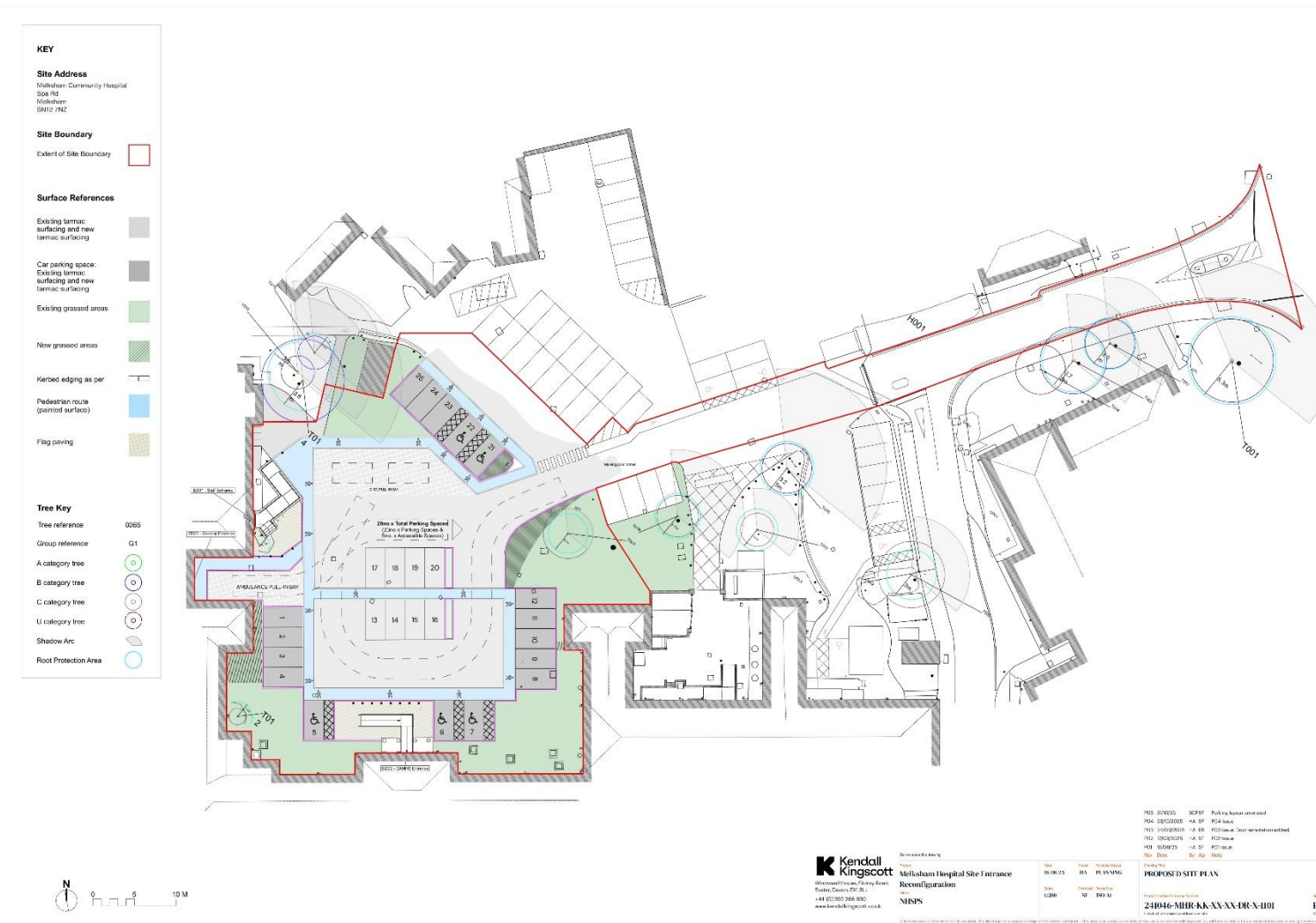


Figure 5 Waterbodies & Watercourses Within 500 m



Figure 6 On-site Baseline UKHab Map



Figure 7 Target Notes

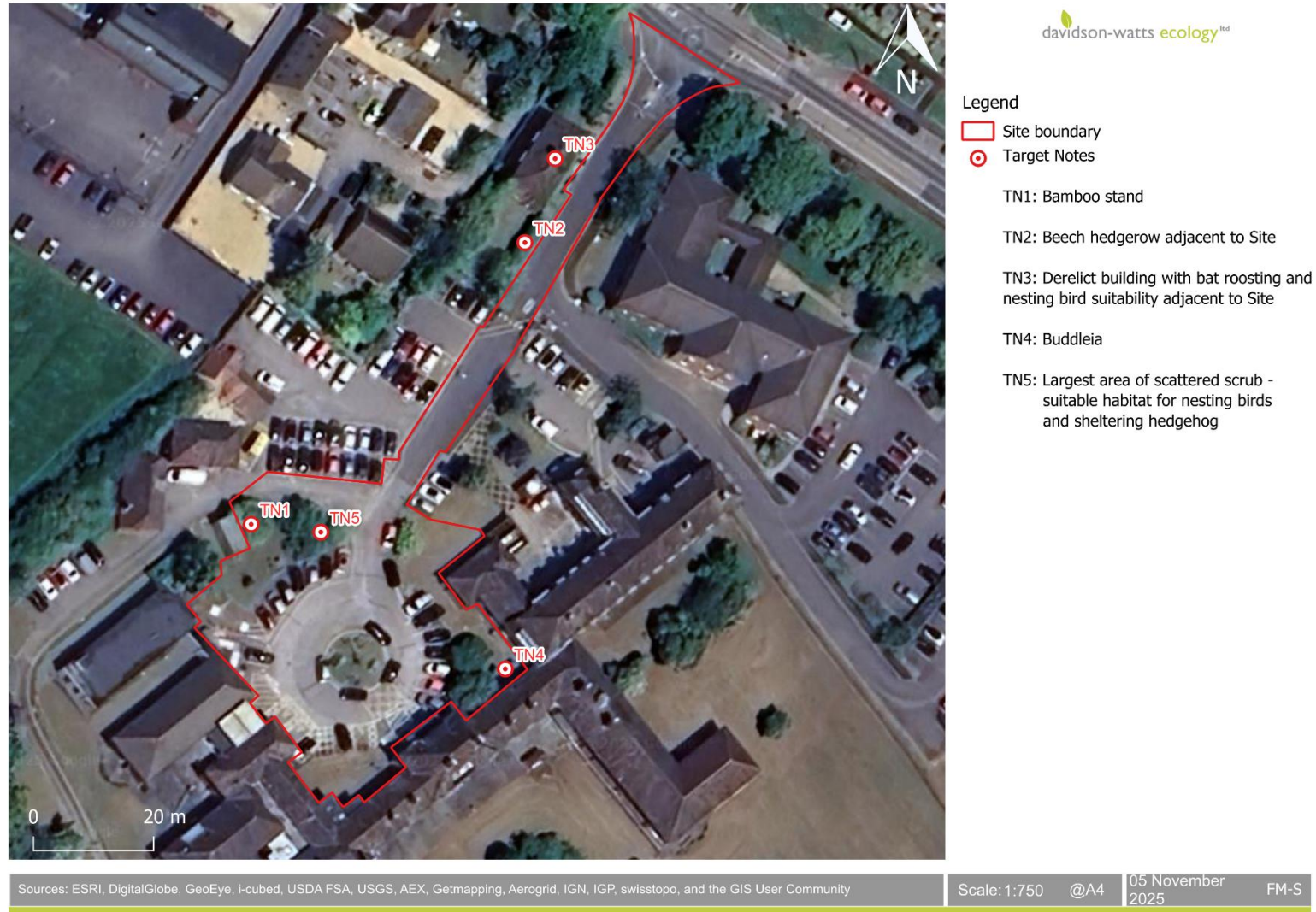


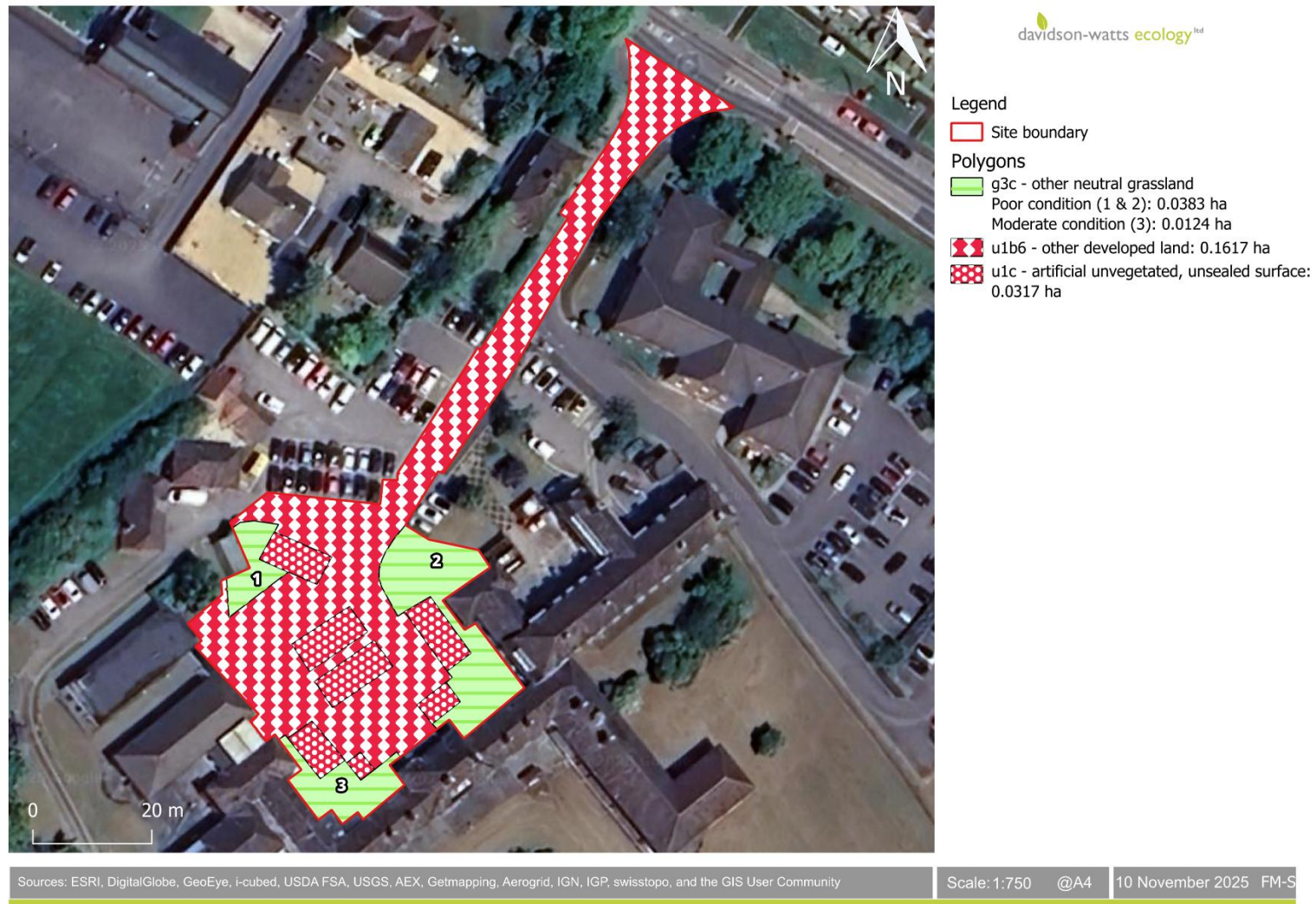
Figure 8 PRA – Building Suitability



Figure 9 Surveyor Locations for Bat Emergence Surveys



Figure 10 On-site Proposed UKHab Map



Appendix A Habitat Descriptions

u1b6 Other developed land

Secondary codes: 800 Road, 804 Car park

The majority of the site consisted of Other developed land, in the form an access road from Spa Road, walkways, and several car parking areas.



g4 Modified grassland

Secondary codes: 10 Scattered scrub, 108 Frequently mown, 510 Bare ground,

There were four patches of modified grassland within the site boundary, all of which were frequently mown and had high levels of access, resulting in some bare ground in places.

Grassland 1 had the most scrub present of all the grassland parcels. There was a large stand of bamboo to the east of building 1, as well as several scattered non-native ornamental shrubs and a cluster in the eastern corner including mock orange *Philadelphus spp.*, viburnum *sp.*, and Forsythia *sp.*. Ground flora included perennial rye grass *Lolium perenne* (D), Yorkshire fog *Holcus lanatus* (F), Cock's foot *Dactylis glomerata* (F) daisy *Bellis perennis* (F), dandelion *Taraxacum sp.* (F), selfheal *Prunella vulgaris* (F), field bindweed *Convolvulus arvensis* (F), common vetch *Vicia sativa* (F), common ivy *Hedera helix* (F), ground ivy *Glechoma hederacea* (F), creeping buttercup *Ranunculus repens* (F), creeping cinquefoil *Potentilla reptans* (F), Ribwort plantain *Plantago lanceolata* (F), red fescue *Festuca rubra* (O), thistle species *Cirsium sp.* (O), hawkbit species *Leontodon sp.* (O), ragwort *Jacobaea vulgaris* (O), groundsel *Senecio vulgaris* (O), yarrow *Achillea millefolium* (O), herb Robert *Geranium robertianum* (R) in the shaded areas only, and field madder *Sherardia arvensis* (R).



Grassland 2 was the smallest grassland parcel. There was scattered non-native ornamental scrub present in the form of viburnum sp., spindle tree *Euonymus* sp., flax species *Phormium* sp., Japanese meadowsweet *Spiraea japonica*, and lavender *Lavandula* sp. Ground flora species included those in Grassland 1, but also knapweed *Centaurea* sp. (O), and bird's-foot trefoil *Lotus corniculatus* (R).



Grassland 3 was the largest grassland parcel. It had some scattered scrub, including buddleia, elder *Sambucus nigra*, holly *Ilex aquifolium*, Viburnum sp., and bramble *Rubus fruticosus*. A small Magnolia shrub was also present on the northern edge. There were areas of bare ground beneath the shrubs, close to the buildings due to shading and near the bench located in the south of the parcel. Ground flora species included those in Grassland 1, but also fringed willowherb *Epilobium ciliatum* (F) and common plantain *Plantago lanceolata* (O).



Grassland 4 was very similar to grassland 1, with only one small patch of Viburnum scrub and no field bindweed, field madder, or thistle sp.



Beech hedgerow and trees adjacent to the site boundary

