

ECOLOGY & BNG ASSESSMENT (BNGA)

24th February 2026

115 Station Road, Westbury, Wiltshire,
BA13 4HN

Applicant: Mr Reece Abbott

Agent/planner: A Harlow & Son

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1	12/01/2026	Keeley Lanigan MSc & Emily Parsons BSc (Hons)	New native hedgerow planting and inclusion of CEMP

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This document has been prepared in accordance with CIEEM's Guidelines for Ecological Report Writing (CIEEM, 2017) and Biodiversity Net Gain Report & Audit Templates (CIEEM, 2021).

This report may contain sensitive data pertaining to particularly vulnerable species. It is the responsibility of the Local Planning Authority to determine whether data and information contained within his report is made publicly available.

At the time of writing, standard methodologies have been used which are accepted by Natural England and other statutory bodies. No responsibility will be accepted where standard methodologies change and where Government, national bodies and industry subsequently modify standards.

This report has been produced using all reasonable skill and care, and a Quality Assurance (QA) review process has been conducted prior to issue of this report.

SURVEY DATA LIFESPAN AND VALIDITY OF THIS REPORT:

Unless otherwise explicitly stated, survey data contained within this report is valid for 12 months from the survey date in accordance with the Chartered Institute of Ecology and Environmental Management (CIEEM) Advice note (CIEEM, 2019) due to the presence of and/or potential for mobile species to be present within the site. However, should the condition on-site change substantially during this 12-month period, and/or if the nature/extent of the development changes, then this report may not be valid, and a reassessment of the site may be required.

This report has been prepared to identify the presence of protected species and habitats within the site, where this falls within the scope of the agreed works.

Survey data has a limited lifespan for mitigation licence applications with Natural England. Update surveys may be required e.g. in the event a bat licence is required; survey data must be sought from the then current survey season (May to August).

The results of the surveys and this assessment are representative at the time of the surveys taking place.



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NON-TECHNICAL SUMMARY:

- ◆ ABR Ecology Ltd were commissioned by A Harlow & Son on behalf of Mr Reece Abbott to produce an Ecology and Biodiversity Net Gain (BNG) Assessment to inform a planning application for the demolition of the outbuildings on-site and the construction of a new dwelling at 115 Station Road, Westbury, Wiltshire, BA13 4HN.

Survey background:

- ◆ A Preliminary Ecological Appraisal (PEA) including a Daytime Bat Walkover (DBW) was conducted on 27th November 2025 by experienced botanist and class licensed ecologist Sophie Morris and class licensed ecologist Zoe Barrett.

Habitats:

- ◆ Area habitats on-site include buildings (u1b5), developed land; sealed surface (u1b6), modified grassland (g4 108), bramble scrub (h3d), and non-native ornamental hedgerow (h2b). No watercourses are present on-site.
- ◆ A Construction Environment Management Plan (CEMP) will be required to manage potential impacts on the nearby County Wildlife Site (Westbury lakes). See Section 5 for further details.

Statutory sites:

- ◆ The site falls within the consultation area for the Salisbury Plains; mitigation will be required due to a net increase of one dwelling. Refer to Section 5.
- ◆ The site falls within the Bath and Bradford-on-Avon Bat SAC consultation zone; provided that the lighting specifications in Section 5 are followed, no impacts on the SAC are anticipated.
- ◆ The site lies within the Trowbridge and Westbury Bat Mitigation Strategy grey zone; mitigation will be required due to a net increase of one dwelling. Refer to Section 5.

Biodiversity Net Gain (BNG) – metric results:

- ◆ The baseline for the BNG assessment is taken to be the site visit dated 27th November 2025; no former site clearance is believed to have occurred prior to the visit on-site.

- ◆ The baseline units on-site are calculated as 0.14 area habitat units and 0.03 hedgerow units; and it is anticipated that a combined net loss of -0.11 area habitat units and -0.03 hedgerow units will be generated post-development.
- ◆ The development is estimated to result in a percentage change of -75.67% in habitat units and -100% in hedgerow units; therefore the 10% net gain has not been achieved on-site for habitats or hedgerows; refer to Section 4 for full results.

Badgers:

- ◆ No evidence of badgers was recorded on-site; no mitigation is advised for this species.

Barn owls and other nesting birds:

- ◆ No evidence of barn owl and no likely foraging habitats were recorded on-site. There is potential for nesting birds to be in the hedgerows on-site; mitigation for nesting birds is provided in Section 5.

Bats:

Roosts in buildings

- ◆ The buildings on-site are considered to hold '**negligible potential**' for roosting bats and so roosting bats are not considered to be a constraint on development. However, further information is provided in Section 5 on the validity of the survey and what to do in the unlikely event a bat is found.

Roosts in trees

- ◆ No trees will be impacted; therefore, no action is advised in relation to potential roosts in trees.

Commuting and foraging habitats

- ◆ The site is located within the Bath and Bradford-on-Avon Bat SAC and Trowbridge and Westbury Bat Mitigation Strategy grey zone so bats are highly likely to be foraging and commuting across the site; new native hedgerow planting and measures for lighting reduction are detailed in Section 5 to minimize impacts of obtrusive lighting on foraging and commuting bats.

Dormice:

- ◆ The site is not considered likely to support dormice; no mitigation is advised for this species.

Great crested newts (GCN):

- ◆ There are 18 records of GCN within 1km of the site; the site falls within an 'Amber Risk Zone' for GCN and there are four waterbodies present within 240 metres of the site. The habitats within the works areas are limited for GCN and the site is surrounded by fencing and roads; therefore, Reasonable Avoidance Measures (RAMs) will be followed for site works as detailed in Section 5.

Hedgehogs:

- ◆ The site has the potential to support commuting and foraging hedgehogs; therefore, mitigation for hedgehogs is provided in Section 5.

Common reptiles and amphibians (herpetofauna):

- ◆ No impacts on common herpetofauna are anticipated as part of the works and no further action is advised for these species provided that vegetation within the site and working area is kept short (>5cm) prior to and during the works.

Biodiversity enhancements:

- ◆ To enhance the site for biodiversity, one bat box, one bird nesting box, and two bee bricks will be installed in the new dwelling; refer to Section 5 for details.

1. INTRODUCTION

- 1.1 ABR Ecology Ltd were commissioned by A Harlow and Son on behalf of Mr. Reece Abbott to produce an Ecology & Biodiversity Net Gain Assessment (BNGA) for 115 Station Road, Westbury, Wiltshire, BA13 4HN (central grid reference: ST 86507 51833) (herein referred to as 'the site' / 'onsite'). This report was requested to produce an Ecology and Biodiversity Net Gain (BNG) Assessment to inform a planning application for the demolition of existing outbuildings and the construction of one new dwelling on-site.
- 1.2 A Preliminary Ecological Appraisal (PEA) including a Daytime Bat Walkover (DBW) was conducted on 27th November 2025 by experienced botanist and class licensed ecologist Sophie Morris and class licensed ecologist Zoe Barrett.
- 1.3 An existing site plan is provided in Appendix A and a proposed site plan and elevations are provided in Appendix B.

Site context

- 1.4 The application site is situated within Westbury, Wiltshire within an urban area. The immediate surrounding area comprises urban residential development and there is a railway with treeline corridors 30m south of the site. There are four ponds within 250m of the site; two of the ponds are surrounded by excellent areas of deciduous woodland priority habitat. The wider surrounding landscape comprises arable land and pasture with connecting hedgerows and urban residential and commercial development. The wider surrounding landscape provides good opportunities for wildlife.

Aims and scope of the report

- 1.5 This assessment primarily aims to determine the biodiversity value of the site and looks to identify the presence/likely absence of protected and vulnerable species onsite. This report also aims to evaluate whether there will be any potential development impacts on protected species and habitats and identifies whether mitigation and/or protected species licensing is required to ensure the development complies with legislation and national and local planning policy.
- 1.6 This assessment also estimates the Biodiversity Net Gain (BNG) anticipated to be generated by the current proposals for the site, as measured using the Statutory Biodiversity Metric (DEFRA, 2025a); and follows guidance set out within the

Biodiversity Net Gain: Good Practice Principles for Development (Baker *et al.*, 2019) and BS 8683:2021 Process for designing and implementing Biodiversity Net Gain - Specification (BSI, 2021).

Relevant planning policy and legislation

1.7 Full details of relevant planning policy and legislation are provided in Appendix C of this report; the following policy and legislation in respect of biodiversity is applicable to this application:

- ◆ *The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019*
- ◆ *The Wildlife and Countryside Act 1981 (as amended) – Section 1 and Schedules 1 and 5*
- ◆ *The Environment Act 2021 – Part 6 Schedule 14*
- ◆ *Town and Country Planning Act 1990 – Schedule 7A (as inserted by Schedule 14 of the Environment Act 2021)*
- ◆ *The National Planning Policy Framework (NPPF) 2024 – Section 15*
- ◆ *National Planning Practice Guidance Natural Environment - para 10-35*
- ◆ *The Natural Environment and Rural Communities (NERC) Act 2006 – Sections 40 and 41*
- ◆ *Circular 06/05: Biodiversity and Geological Conservation – Statutory Obligations and Their Impact Within the Planning System*
- ◆ *The Wiltshire Core Strategy 2015 (Wiltshire Council, 2015)*
- ◆ *Local Nature Recovery Strategy for Wiltshire and Swindon 2025 (Wiltshire Council, New Forest National Park & Swindon Borough Councils, 2025)*

1.8 **It is the responsibility of the applicant(s) to ensure that the proposed development proceeds in full compliance with legislation, national and local policy, and in accordance with all conditions of the obtained planning consent(s). It is also the responsibility of the applicant(s) to request a report amendment / reassessment of the site where the scale/nature of the proposed plans subsequently change.**

2. METHODOLOGY

Desktop data search

- 2.1 Protected sites under the UK National Site Network including Special Protection Areas (SPAs) and Special Areas of Conservation (SACs), and Ramsar's were identified within 7.5 kilometre (km) of the site; and Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNRs), and Local Nature Reserves (LNRs) were identified within 2km of the site using the Multi-Agency Geographical Information for the Countryside (MAGIC) website (MAGIC, 2025).
- 2.2 A search was also conducted on MAGIC (2025) to identify the potential presence of priority habitats, European Protected Species (EPS) licences and known great crested newt breeding ponds.
- 2.3 Wiltshire & Swindon Biological Records Centre (WSBRC) (2025) were contacted to provide records of protected, vulnerable and notable species, Local Wildlife Sites (LWS) and Ecological Networks within a 1km radius of the application site.
- 2.4 This information was used to evaluate the potential of the site for protected and vulnerable species, and to determine whether there is potential for development impacts on these species, surrounding habitats and protected sites.
- 2.5 To inform the BNG assessment, a desktop study was undertaken to determine strategic significance of habitats. This comprised a review of the following:
 - ◆ Multi-Agency Geographic Information for the Countryside (MAGIC) online database (accessed December 2025) to identify any statutory nature conservation designations.
 - ◆ Data search response from WSBRC (November 2025).
 - ◆ The Wiltshire Core Strategy (Wiltshire Council, 2015).
 - ◆ Local Nature Recovery Strategy for Wiltshire and Swindon Public Consultation Draft March 2025 (Wiltshire Council, New Forest National Park & Swindon Borough Councils, 2025).

Botanical survey (UKHab)

- 2.6 A botanical survey of the site was conducted on 27th November 2025 by experienced botanist and class licensed ecologist Sophie Morris and class licensed ecologist Zoe Barrett.

- 2.7 Habitats on site were classified and coded in accordance with the UKHab Classification System, using the UK Habitat Classification Definitions document Version 2.0 (UKHab Ltd, 2023a) and UKHab Field Key Version 2.1 (UKHab Ltd, 2023b). Other features of ecological interest were identified using ‘target notes’. Habitats were assigned both primary and secondary (essential and additional) UKHab codes, where relevant.
- 2.8 The survey involved a detailed flora survey of habitats, and each flora species was allocated an abundance in accordance with the DAFOR scale, using local (L) as a pre-fix where a species was restricted in distribution across the habitat:
- D** – Dominant
 - A** – Abundant
 - F** – Frequent
 - O** – Occasional
 - R** – Rare
- 2.9 Habitats on-site were classified and coded in accordance with the UKHab Classification System, using the UK Habitat Classification Definitions document Version 2.0 (UKHab Ltd, 2023¹) and UKHab Field Key Version 2.1 (UKHab Ltd, 2023²). Other features of ecological interest were identified using ‘target notes’.
- 2.10 All mapping was undertaken digitally within the Coreo app and the geopackage was then imported back into QGIS.

Statutory Biodiversity Metric

Baseline and proposed habitat mapping

- 2.11 Pre and post-development habitat maps were digitised using the QGIS template associated with the Statutory Biodiversity Metric (Natural England, 2025a). The proposed site plan (as shown in Appendix B) was georeferenced, and habitats were overlain using this plan.
- 2.12 Information was entered for each parcel including habitat type, condition, strategic significance, a unique habitat parcel reference, a retention category and a spatial risk category for both on-site and offsite proposed habitats (where applicable).

Strategic significance

- 2.13 Habitats within the site were assessed to identify whether these occurred within any strategic locations for biodiversity; if a Local Nature Recovery Strategy (LNRS) was

published for the Local Planning Authority, a search of the LNRS was conducted to determine if any proposed habitats within the site fall within a strategic location for a target habitat type in that particular location.

Measurements of Habitat Areas

- 2.14 Baseline and proposed habitat areas were measured as distinct habitat parcels. Baseline habitat parcels were measured using habitat mapping and aerial photography overlain in QGIS and Coreo. Post-development habitat parcels were calculated by measuring the proposed site plan (as shown in Appendix B).
- 2.15 Data from the QGIS template was then transferred to the Statutory Biodiversity Metric Calculation tool using the QGIS Import Tool associated with the Metric.

Surveyor competencies and relevant training

- 2.16 Class licensed ecologists Sophie Morris and Zoe Barrett undertook the baseline survey; both ecologists have undertaken CIEEM certified training in the Biodiversity Metric 4.0 and UK Habs.

Protected species assessment

Badgers

- 2.17 A walkover was conducted during the site visit looking for potential evidence of badgers *Meles meles*. Evidence of badgers can include the presence of setts (underground burrows), 'snuffle marks' (nose marks and scratches from badger foraging within the earth), latrines (territorial marking sites), scats, hair, footprints and well-worn paths.

Barn owls and other nesting birds

- 2.18 A search was conducted for evidence of barn owl *Tyto alba* and other nesting birds within and around the buildings and vegetation during the site visit. Evidence of nesting birds can include the physical presence of chicks and/or adult birds, nesting material, eggs and/or egg casings, feathers, white splashing (droppings), and pellets (for barn owls).

Bats

Daytime Bat Walkover (DBW)

- 2.19 A Daytime Bat Walkover (DBW) survey was conducted to assess the site and record any habitats suitable for roosting bats. This included an inspection of buildings and trees for bat suitability as detailed below.

Survey conditions, equipment and timings

- 2.20 Survey information for the Preliminary Roost Assessment (PRA) is provided in Table 1 below:

Table 1: Weather conditions, equipment and timings for survey

Survey date	Time of survey	Surveyor(s)	Equipment available for use	Weather conditions		
27/11/2025	10:30am	Sophie Morris and Zoe Barrett	High-powered torch, mirrors, sealable bags, FFP3 face masks, gloves, extendable ladder, endoscope, binoculars	Temp:	Okta cloud cover:	Beaufort wind force:
				13°C	8/8	3/12

- 2.21 The surveying ecologists have received training in Working at Heights (and in-house training in the use of ladders for PRA surveys), Manual Handling, and Emergency First Aid At Work to ensure compliance with Health and Safety legislation (The Work at Height Regulations 2005, Manual Handling Operations Regulations 1992, The Health and Safety (First-Aid) Regulations 1981).

Buildings

- 2.22 The PRA was undertaken in accordance with The Bat Conservation Trust (BCT) Good Practice Guidelines 4th ed (Collins, 2023). A systematic search was made of any internal building areas / loft spaces and exterior building areas. Where present, information was compiled on the potential and actual bat entry/exit points (where possible); potential and actual bat roosting locations; and any evidence of bats found.
- 2.23 The external building assessment included an inspection of the ground/flooring, and where present, any windowsills, windowpanes, behind peeling paintwork/lifted render, brick/block work, chimneys, eaves, lead flashing, tiles and soffits etc.
- 2.24 Evidence of roosting bats in buildings can include:
- ◆ The presence of physical live/deceased bats
 - ◆ Bat droppings (distinguished from rodent droppings by their crumbly texture)

- ◆ Fur-oil staining around entry/exit points
- ◆ Urine splashing
- ◆ Feeding remains, such as insect wings and casings

2.25 The building was identified as a ‘confirmed’ bat roost where bat evidence was recorded. If droppings were present, a sample of the bat droppings were collected and couriered to Swift Ecology Ltd for DNA analysis to confirm the species of bat present.

2.26 Most native bats in England are crevice-dwelling species, with bats roosting in remote areas, such as under roof tiles; behind cladding; in cavities; soffits; and behind lead flashing etc, and evidence of these species is often concealed and/or inaccessible. Therefore, where no evidence of roosting bats was recorded, an assessment on the availability of potential roosting areas and bat exit/entry points around the buildings was conducted. The buildings were then assigned a category based on a sliding scale of potential for bats, ranging from ‘none’ to ‘high’ (Collins, 2023) (Table 2 below):

Table 2: Guidelines for assessing the potential suitability of buildings for bats (Collins, 2023)

Bat roosting potential	Description
‘High’	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis & potentially for longer periods of time due to their size, shelter, protection, conditions (temperature, humidity, height above ground level, adverse light levels, or high levels of disturbance), and surrounding habitat. The structure has the potential to support high conservation status roosts for example maternity or classic cool/stable hibernation-sites.
‘Moderate’	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions (temperature, humidity, height above ground level, adverse light levels, or high levels of disturbance), and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity & hibernation and this is made irrespective of species conservation status, which is established after presence if confirmed via the PRA).
‘Low’	The building features one or more potential roosting features that could be used by bats opportunistically at any time of year. However, these potential roost sites do not provide enough space,

	shelter, protection, appropriate conditions (temperature, humidity, height above ground level, adverse light levels, or high levels of disturbance) and/or suitable surrounding habitat to be used on a regular basis or by a larger number of bats.
‘Negligible’	There are no obvious habitat features likely to be used by bats, however there is a small element of uncertainty as bats can use small and apparently unsuitable features on occasion. (*negligible is defined as ‘so small or unimportant as to be not worth considering, insignificant’. This category may be used where there are places that a bat could roost or forage (due to one attribute), but it is unlikely that they would (due to another attribute).
‘None’	No habitat features on-site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels).

Trees

- 2.27 A Ground-Level Tree Assessment (GTLA) was undertaken in accordance with The BCT Guidelines (Collins, 2023). A systematic search was made of any trees on-site for bats and where present, information was compiled on the potential and actual bat entry/exit points (where possible); potential and actual bat roosting locations; and any evidence of bats found.
- 2.28 The inspection was carried out systematically and consistently around all parts of each tree (from all angles and close to the trunk and further away). Potential Roosting Features (PRFs) that can be exploited by bats include the following (Table 3 below):

Table 3: Potential Roosting Features (PRFs) for bats in trees

PRFs formed by disease and decay	PRFs formed by damage	PRFs formed by association
Woodpecker holes	Lightning strikes	Fluting Ivy
Squirrel holes	Hazard beams	
Knot holes	Subsidence cracks	
Pruning cuts	Shearing cracks	
Tear outs	Transverse snaps	
Wounds	Welds	
Cankers	Lifting bark	
Compression	Desiccation	
Forks	Fissures	
Butt rots	Frost cracks	

2.29 Trees were categorized in accordance the scale shown in Table 4 below:

Table 4: Categories for assigning tree potential for roosting bats

Suitability	Description
NONE	Either no PRFs in the tree or highly unlikely to be any.
FAR	Further assessment required to establish if PRFs are present in the tree.
PRF	A tree with at least one PRF present.

2.30 The above assessment was further refined for any trees with identified Potential Roosting Features (PRFs) which were categorized in accordance with the following scale (Table 5 below) (Collins, 2023):

Table 5: Categories for assigning tree potential for roosting bats

Suitability	Description
PRF-I	PRF is only suitable for individual bats either due to size or lack of suitable surrounding habitats.
PRF-M	PRF is suitable for multiple bats and may therefore be used by a maternity colony.

2.31 The tree was identified as a 'confirmed' bat roost where bat evidence was recorded. If droppings were present, a sample of the bat droppings were collected and couriered to Swift Ecology Ltd for DNA analysis to confirm the species of bat present.

Dormice

2.32 An assessment was conducted to evaluate the suitability of the habitats on-site for the dormouse *Muscardinus avellanarius*, a small, nocturnal mammal which occupies habitats such as hedgerows, scrub, woodland and treelines. The dormouse requires good habitat connectivity and suitable food resources providing fruit, nuts, nectar and/or insects throughout the year.

Great crested newts

2.33 The habitats on-site were assessed for their potential to support the great crested newt *Triturus cristatus* (GCN). GCN occupy both aquatic and terrestrial habitats, spending most of their life cycle on land and a short period of the year for breeding and egg-laying. Suitable terrestrial habitats can include grassland, woodland, hedgerows, scrub, and tall herb communities; and suitable overwintering (hibernation) sites can include piles of materials such as rubble/logs and at the base of buildings/stone walls.

- 2.34 GCN are known to travel up to 500 metres (m) from their breeding sites; for this reason, an aerial assessment was made prior to the site visit to determine if any waterbodies were present on-site and around the site (offsite). Any accessible waterbodies were assessed under the Habitat Suitability Index (HSI) (Oldham et al, 2000, 2008) to determine the suitability of the waterbody to support great crested newts.

Reptiles and common amphibians

- 2.35 An appraisal of the habitats on-site was conducted to evaluate their suitability for common British reptiles, such as slow worm *Anguis fragilis*, common lizard *Zootoca vivipara*, grass snake *Natrix helvetica* and adder *Vipera berus*, and common amphibians such as common frog *Rana temporaria*.
- 2.36 Suitable habitats for reptiles and amphibians include those with a varied structure, offering a range of niches for basking and foraging. Typical habitats include rough and unmanaged grassland with shorter margins, heathland, woodland, scrub and ruderal vegetation. Potential overwintering (hibernation) sites can include piles of materials such as rubble/logs, rockeries and at the base of buildings/stone walls.

Survey limitations and assumptions

PEA and UKHabs survey

- 2.37 The UKHabs habitat survey was conducted at an optimal time of the year for general botanical survey. However, the site forms part of an active farm with the vegetation regularly subject to management.
- 2.38 An aerial search for waterbodies can be constrained by the accuracy of online maps. Several websites were accessed to minimize the chances of missing waterbodies, however, garden ponds within residential properties are very rarely mapped and it is possible that waterbodies have been overlooked as part of this assessment.
- 2.39 The site visit provides a 'snapshot' of the site and does not take into account seasonal variation. Flora species may have been overlooked due to the constraints of the season and time in which the survey was undertaken.
- 2.40 Certain species, such as bats and nesting birds, are highly mobile and it is therefore possible for these species to occupy the site at any time in the future, particularly if any alterations/changes occur to the site. The survey only provides a 'snapshot' in time and does not account for seasonal variation. As such, it is not possible to have

complete certainty that species are not present, rather, there was no indication of their presence at the time of survey.

PRA and GTLA surveys

- 2.41 Evidence of crevice-dwelling bats may have been overlooked due to the nature of bat roosts, being remote and often inaccessible. Binoculars were used to identify any potential bat droppings on the exterior features of the buildings and trees where possible.
- 2.42 Often bats leave no visible sign of their presence on the outside of buildings/trees, and even when they do, wet weather can wash evidence away.
- 2.43 The GLTA can be constrained by canopy cover and by the angle of the surveyor and some Potential Roosting Features (PRFs) may not be visible from ground level. Where PRFs are present at height, these cannot be inspected from ground level. A full detailed tree inspection will be required at the full application stage to determine the PRFs and potential of trees to be impacted.

DEFRA Statutory Biodiversity Metric

- 2.44 The Statutory Biodiversity Metric relies on outputs of biodiversity unit calculations which are not absolute values or scientifically precise. Therefore, the Metric and its outputs should be informed by a qualitative assessment and the Metric's results interpreted within caution.
- 2.45 The Statutory Biodiversity Metric does not change the legislation afforded to biodiversity; individual species and protected/irreplaceable habitats are outside of the scope of the Metric and are addressed separately within this assessment.
- 2.46 The accuracy of habitat area measurements is limited by the form of baseline data collection and resolution of the proposed site plan. QGIS and Coreo have been used to calculate habitat areas which have been aligned with Google Maps satellite imagery and the proposed site plan.
- 2.47 Habitat condition for newly created habitats was assigned on a precautionary approach and with consideration of biological and operational phase conditions (i.e. which may limit the degree to which 'good' condition is likely to be reached).

Reporting and survey lifespan

- 2.48 The data within this report should not be seen as comprehensive. Data obtained from the data search (WSBRC, 2025) is unlikely to provide a complete record of species within the search area. It is possible that a species may occur within the vicinity of the site that has not been identified within the data search.
- 2.49 Survey data is considered valid for 12 months from the survey date in accordance with the Chartered Institute of Ecology and Environmental Management (CIEEM) Advice note (CIEEM, 2019) due to the presence of and/or potential for mobile species to be present within the site.
- 2.50 **Survey data is only intended for the proposals outlined within this report.** If any material changes to the site occur and/or if the nature and/or extent of the proposed development changes, an update visit to reassess the site will be required, and any conclusions provided herein may not be relied upon.

3. RESULTS

Desktop data search

Internationally, nationally and regionally protected (statutory) sites

- 3.1 MAGIC (MAGIC, 2025) was used to identify SPAs and SACs as included under the UK National Site Network and Ramsars within 7.5km of the site; and nationally/locally protected sites (NNRs, LNRs, SSSIs) within 2km of the site. Results are presented in Table 6 below:

Table 6: Statutory designated sites around application site

Site name	Distance from site	Designation	Site description
Bath and Bradford-on-Avon Bat Consultation Zone	On-site	SAC (consultation zone)	This site in southern England includes the hibernation sites associated with 15% of the UK greater horseshoe bat population and is selected on the basis of the importance of this exceptionally large overwintering population. Small numbers of Bechstein's bats have been recorded hibernating in abandoned mines in this area, though maternity sites remain unknown.
Westbury Ironstone Quarry	1.4km southwest	SSSI	Nationally important type locality for the Upper Oxfordian Westbury Iron Ore, with key ammonite and bivalve fossils of high stratigraphic and paleoenvironmental value.
Salisbury Plain	2.8km southeast	SPA	During the breeding season the SPA regularly supports at least 14.5% of the stone-curlew western European population, 20% of the British gaul population, 1.2% of British hobby population and over winter the SPA regularly supports 0.7% of the British hen harrier population.
Salisbury Plain	2.8km southeast	SAC	Designated for Annex I habitats Juniperus communis formations on heaths or calcareous grasslands and semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) and Annex II species Marsh fritillary butterfly Euphydryas (Eurodryas, Hypodryas) aurinia.

Impacts on statutory sites

Bath and Bradford-on-Avon SAC

- 3.2 The development site is located within the Bath and Bradford-on-Avon SAC consultation zone. The site is within the 4km Core Area for greater horseshoes; the distance of the nearest Core Roost associated with the SAC is approximately 2km southwest of the proposed development site. Impacts upon the Bath and Bradford

on Avon SAC populations and the Core Roost population located 2km southwest of the site are discussed below within the ‘Bats’ results section.

Salisbury Plain SPA

- 3.3 The application site is located within 2.8km of the Salisbury Plain SPA. The Council’s Habitats Regulations Assessment (HRA) and Mitigation Strategy for Salisbury Plain SPA (Wiltshire Council, 2018) has identified that residential developments falling within 6.4km of the SPA have been demonstrated to increase recreational pressures upon these sites and the species using them, through increased visitation and activities, such as dog-walking.
- 3.4 Mitigation will be required for the application due to a net increase of one dwelling; further information is provided in Section 5.

Locally designated (non-statutory) sites

- 3.5 WSBRC (2025) were consulted to provide results of any locally designated sites within 1km of the site. Results are presented in Table 7 below:

Table 7: Locally designated (non-statutory) sites

Site name	Distance from site	Designation	Area (ha)	Site description
Westbury Lakes	15m northwest	Local Wildlife Site (LWS)	11.1	Two large open areas of freshwater near the railway intersections at Westbury.

Impacts on non-statutory sites

- 3.6 The Westbury Lakes LWS lies very close to the site, a Construction Environment Management Plan (CEMP) will be required pre-commencement of works detailing how the LWS will be protected from construction activities; further details are provided in Section 5 of this report.

Priority habitats

- 3.7 No priority habitats were identified on-site; the nearest area of priority habitat, deciduous woodland, is located approximately 125m northwest of the site boundary (MAGIC, 2025). The habitat is buffered by a road, hedgerows and a lake, therefore no impacts on this habitat are anticipated.
- 3.8 No further action is recommended regarding priority habitats.

Protected, rare and vulnerable species

3.9 WSBRC (2025) was consulted to provide any records of protected/vulnerable species of interest as presented in Table 8 below:

Table 8: Records for protected/vulnerable species of interest

Common name	Taxonomic name	Number of records	Most recent record	Nearest record to site
Bats				
Barbastelle	<i>Barbastella barbastellus</i>	6	2024	920m southwest
Bechstein's bat	<i>Myotis bechsteinii</i>	4	2006	520m northeast
Brandt's bat	<i>Myotis brandtii</i>	1	2020	530m northwest
Brown long-eared bat	<i>Plecotus auritus</i>	3	2019	225m southeast
Common pipistrelle	<i>Pipistrellus pipistrellus</i>	308	2020	60m north
Daubenton's bat	<i>Myotis daubentonii</i>	5	2006	520m northeast
Greater horseshoe	<i>Rhinolophus ferrumequinum</i>	7	2024	885m north
Leisler's bat	<i>Nyctalus leisleri</i>	5	2020	875m north
Lesser horseshoe	<i>Rhinolophus hipposideros</i>	16	2024	75m north
Long-eared bat species	<i>Plecotus sp.</i>	9	2020	520m northeast
Myotis bat species	<i>Myotis sp.</i>	26	2024	520m northeast
Nathusius's pipistrelle	<i>Pipistrellus nathusii</i>	2	2020	890m northwest
Natterer's bat	<i>Myotis nattereri</i>	3	2006	520m northeast
Noctule	<i>Nyctalus noctula</i>	45	2024	70m north
Nyctalus species	<i>Nyctalus sp.</i>	8	2024	885m southwest
Pipistrelle species	<i>Pipistrellus</i>	12	2020	60m north
Serotine	<i>Eptesicus serotinus</i>	26	2024	510m northeast
Soprano pipistrelle	<i>Pipistrellus pygmaeus</i>	85	2020	60m north
Whiskered bat	<i>Myotis mystacinus</i>	11	2020	520m northeast
Whiskered/Brandt's bat	<i>Myotis mystacinus/brandtii</i>	3	2020	880m north
Birds				
Barn owl	<i>Tyto alba</i>	1	2021	Within 1km
Black redstart	<i>Phoenicurus ochruros</i>	4	2015	960m southeast
Black tern	<i>Chlidonias niger</i>	2	2006	220m northeast
Cuckoo	<i>Cuculus canorus</i>	3	2020	960m southeast
Fieldfare	<i>Turdus pilaris</i>	1	2017	Within 1km
Garganey	<i>Spatula querquedula</i>	6	2021	340m northeast
Great northern diver	<i>Gavia immer</i>	2	2008	535m northwest
Greylag goose	<i>Anser anser</i>	2	2021	525m northeast
Hen harrier	<i>Circus cyaneus</i>	1	2021	190m southeast
Hobby	<i>Falco subbuteo</i>	2	2019	190m southwest
House sparrow	<i>Passer domesticus</i>	4	2021	980m northeast
Kingfisher	<i>Alcedo atthis</i>	16	2021	385m northeast
Lapwing	<i>Vanellus vanellus</i>	4	2021	520m northeast
Lesser redpoll	<i>Acanthis cabaret</i>	1	2018	960m southwest
Merlin	<i>Falco columbarius</i>	2	2021	535 northwest
Osprey	<i>Pandion haliaetus</i>	2	2015	960 southwest
Peregrine	<i>Falco peregrinus</i>	6	2021	530m northwest

Red kite	<i>Milvus milvus</i>	24	2021	340m northeast
Redwing	<i>Turdus iliacus</i>	2	2021	535m northeast
Reed bunting	<i>Emberiza schoeniclus</i>	14	2021	135m northwest
Ring ouzel	<i>Turdus torquatus</i>	2	2021	970m southeast
Skylark	<i>Alauda arvensis</i>	1	2002	Within 1km
Spotted flycatcher	<i>Muscicapa striata</i>	2	2021	975m southeast
Swift	<i>Apus apus</i>	28	2024	510m northwest
Wryneck	<i>Jynx torquilla</i>	1	2006	975m southeast
Yellowhammer	<i>Emberiza citrinella</i>	1	2021	975m southeast
Flora				
Bluebell	<i>Hyacinthoides non-scripta</i>	3	2018	95m southwest
Invertebrates				
Blood-vein	<i>Timandra comae</i>	1	2017	1km southeast
Buff ermine	<i>Spilosoma lutea</i>	1	2017	1km southeast
Dot moth	<i>Melanchra persicariae</i>	1	2017	1km southeast
Ghost moth	<i>Hepialus humuli</i>	1	2017	1km southeast
Knotgrass	<i>Acronita rumicis</i>	1	2017	1km southeast
Lackey	<i>Malacosoma neustria</i>	1	2017	1km southeast
Small blue	<i>Cupido minimus</i>	2	2010	965m southeast
Small emerald	<i>Hemistola chrysoprasaria</i>	1	2017	1km southeast
Small heath	<i>Coenonympha pamphilus</i>	5	2020	530m southeast
Small phoenix	<i>Ecliptopera silaceata</i>	1	2017	1km southeast
V-moth	<i>Macaria wauaria</i>	1	2017	1km southeast
Wall	<i>Lasiommata megera</i>	6	2021	425m south
Other mammals				
Badger	<i>Meles meles</i>	7	2009	555m northwest
Hedgehog	<i>Erinaceus europaeus</i>	161	2022	190m south
Otter	<i>Lutra lutra</i>	2	2019	795 northeast
Water vole	<i>Arvicola amphibius</i>	6	2023	590 northeast
Reptiles and amphibians				
Adder	<i>Vipera berus</i>	1	2010	385m northeast
Common frog	<i>Rana temporaria</i>	2	2010	570m southeast
Common lizard	<i>Zootoca vivipara</i>	4	2010	490m northeast
Grass snake	<i>Natrix helvetica</i>	4	2010	365m northeast
Great crested newt	<i>Triturus cristatus</i>	19	2017	495m north
Slow worm	<i>Anguis fragilis</i>	8	2010	365m northeast

3.10 There are nearby records for light-sensitive barbastelle, horseshoe species, long-eared bat species, and myotis bat species; there is potential for changes in artificial lighting to impede foraging and commuting bats that may be using the general site. Therefore, general lighting specifications are detailed in Section 5 of this report to minimise obtrusive lighting impacts on bats.

3.11 There are nearby records for hedgehogs; further discussion regarding this species is provided under 'Protected species' further on in Section 3.

Botanical survey (UKHab)

Habitats recorded on-site

- 3.12 The following habitats were recorded within the site (habitat maps and species lists for each habitat are provided in Appendix D and photographs provided in Appendix E of this report) (Table 9):

Table 9: Habitats recorded on-site

Habitat	Primary UKHab code	Secondary UKHab code(s) ¹	Description
Buildings	u1b5	-	There are three buildings on-site, one shed (B1), one garage (B2), and one semi-detached house (B3).
Bramble scrub	h3d	-	There is a small area of scrub made up of bramble (<i>Rubus fruticosus</i>), nettle (<i>Urtica dioica</i>), and ivy (<i>Hedera helix</i>) in the southwest of the site.
Developed land; sealed surface	u1b6	-	There are areas of concrete foot paths across the site and a concrete driveway in the northwest.
Modified grassland	g4	108	Modified grassland with abundant areas of perennial rye-grass is present across the site (<i>Lolium perenne</i>). The grassland is frequently mown (108).
Non-native & ornamental hedgerow	h2b	-	A non-native & ornamental hedgerow (523) makes up part of the northern boundary of the site.

Impacts of development on habitats

- 3.13 The proposed development will involve the retention of areas of developed land; sealed surface (u1b6); all other habitats on-site will be lost during the development. A new dwelling, vegetated garden and artificial unvegetated; unsealed surface will be included as part of the proposed development.
- 3.14 The results of the metric, undertaken to calculate measurable habitat losses/gains, are provided under Section 4 of this report.

Protected species assessment

Badgers

- 3.15 Seven known badger records are present within 1km of the site (WSBRC, 2025) and whilst the site possesses some suitable habitat for badgers, no evidence to suggest badgers are present on-site was identified. Based on a lack of evidence, badgers are not considered likely to be impacted by the proposals and no further action is advised for this species.

Barn owls and other nesting birds

- 3.16 No evidence of barn owls was present on-site; the grassland on-site is frequently mown and lacks a deep thatch layer required for prey. Therefore, this species is not considered to be impacted by the proposals and barn owls are not discussed further in this assessment.
- 3.17 The hedgerow and scrub on-site provide potential nesting opportunities for birds; therefore, a mitigation plan is detailed in Section 5 of this report to mitigate for impacts on nesting birds.

Bats

Daytime Bat Walkover (DBW)

Buildings - roosts

- 3.18 A description of the buildings surveyed for roosting bats with any identified potential bat access points and roosting areas is provided in Table 10 below (see Appendix E for building locations and Appendix D for photographs):

Table 10: Building description

Building	Description	
Shed ('B1')	- A wooden shed is present in the south of the site. - The roof is pitched and constructed of bituminous 1F felt. - Wooden weather boarding is present. - Wooden window and door frames are present. - The ceiling is vaulted and no enclosed loft void is present.	
	Potential access points:	Potential roosting areas:
	- No ingress points considered suitable for bats were identified around the property.	- Due to a lack of access, no potential roosting areas were identified.
	Evidence of bats recorded:	
	- No evidence of bats was recorded around the building.	
	DNA analysis of dropping sample (as tested by Swift Ecology Ltd):	
	- n/a	
Garage ('B2')	Roost status / potential of the building for bats:	
	'Negligible potential' for roosting bats	
	- A rendered garage is present in the west of the site. - The roof is flat and constructed of bituminous 1F felt with a clay roof tile overhang on the north elevation. - Wooden door frames are present. - There is a conservatory constructed of wood and uPVC present on the east elevation of the garage. - No enclosed loft voids are present.	
	Potential access points:	Potential roosting areas:
	- No ingress points considered suitable for bats were identified around the property.	- Due to a lack of access, no potential roosting areas were identified.
	Evidence of bats recorded:	
	- No evidence of bats was recorded around the building.	

	DNA analysis of dropping sample (as tested by Swift Ecology Ltd):
	- n/a
	Roost status / potential of the building for bats:
	'Negligible potential' for roosting bats

- 3.19 The shed ('B1') and garage ('B2') on-site were considered to hold 'negligible potential' for roosting bats in line with the BCT Guidelines (Collins, 2023), therefore no further survey recommendations are advised for these buildings.
- 3.20 On this basis, it is considered that bats are likely absent from the buildings and therefore roosting bats are not considered likely to be impacted by the proposed works.
- 3.21 The house ('B3') was not assessed as it will not be impacted by the proposed works.
If the plans change and the house will be impacted, then an update survey must be undertaken to assess the house for roosting bats.
- 3.22 No further surveys or licensing requirements are recommended, however, further information regarding the validity of this report and what to do in the unlikely event a bat is unexpectedly found is provided in Section 5 of this report.

Trees - roosts

- 3.23 No trees will be impacted by the proposed works so no impacts on roosts within trees are anticipated.

Bath and Bradford-on-Avon SAC

- 3.24 The site lies within the 4km buffer area for greater horseshoes within the Bath and Bradford-on-Avon SAC and lies approximately 2km from a Core Roost. The SAC is made up of main hubs and a complex network of commuting routes and foraging areas. Therefore, detailed survey methods are often required for development proposals located within the consultation zone.
- 3.25 Sensitive features that make up foraging areas and commuting corridors within the SAC (such as woodland, watercourses, hedgerows and embankments) are present near the site; however, none are anticipated to be affected by the proposed works.
- 3.26 There only potential feature onsite is the non-native hedgerow; however, this is isolated and does not form a corridor to surrounding habitats it is not considered to be a sensitive feature and is unlikely to be used by greater horseshoes.

- 3.27 No physical changes to sensitive features will take place on site and the artificial lighting plan detailed in Section 5 will provide mitigation for any new lighting on-site post-development. No further surveys are recommended in relation to the SAC.

Trowbridge and Westbury Bat Mitigation Strategy

- 3.28 The application site lies within the Trowbridge and Westbury Bat Mitigation Strategy (TWBMS) grey zone; therefore, mitigation will be required due to the net increase of one dwelling. Further information is provided in Section 5.

Artificial lighting and bats – foraging and commuting habitats

- 3.29 Bats are very sensitive to artificial lighting, which can impede their ability to successfully forage and can alter flightpaths (BCT & ILP, 2023). As bats are likely using the site during nocturnal hours and the site is within the Bath and Bradford-on-Avon SAC consultation zone and the TWBMS grey zone, it is essential that new lighting is designed to minimise impacts on foraging bats, particularly around areas with mature vegetation such as trees and hedges. Light spill can extend beyond the site boundary and may therefore also impact bats using neighbouring land for foraging and commuting corridors.
- 3.30 Lighting specifications to minimise impacts on foraging and commuting bats are detailed in Section 5.
- 3.31 To provide habitat mitigation and enhancements on-site for foraging and commuting bats, new native hedgerow planting is detailed in Section 5 of this report.

Dormice

- 3.32 No known dormice records exist within the local area (WSBRC, 2025); and the nearest European Protected Species (EPS) licence is located approximately 10.2km southeast of the site (MAGIC, 2025) and the habitat on-site is not considered suitable for dormice. A hedgerow is present on-site but lacks connectivity to the surrounding area. Therefore, dormice are not considered to be affected by the proposed works, and no mitigation is advised for this species.

Great crested newts

- 3.33 There are areas of potential habitat for great crested newt (GCN) largely limited to the hedgerow and bramble scrub on-site.

- 3.34 No ponds were identified on-site, however, four ponds were identified within 250m of the site (See Appendix G for pond locations). Habitat Suitability Index (HSI) Assessments were undertaken upon the ponds and the results of which are presented below in Table 11:

Table 11: HSI results

Waterbody ref:	Pond 1	Pond 2	Pond 3	Pond 4
SI1 - Location	1	1	1	1
SI2 - Pond area	0.955	0.1	0.8	0.8
SI3 - Pond drying	1	0.1	0.9	0.9
SI4 - Water quality	0.67	0.33	0.67	0.67
SI4 - Shade	1	1	1	1
SI6 - Fowl	0.67	0.67	0.67	0.67
SI7 - Fish	1	1	0.7	0.7
SI8 - Ponds	1	1	1	1
SI9 – Terrestrial habitat	0.33	0.33	0.67	0.67
SI10 - Macrophytes	0.45	0.45	0.45	0.45
HSI SCORE =	0.76	0.45	0.76	0.76

- 3.35 The site is situated within an ‘Amber Risk Zone’ for GCN (Natural England, 2025); therefore, there is a moderate probability of GCN within the local area.
- 3.36 There are 19 known GCN records within 1km with the closest record located approximately 495m north of the site (WSBRC, 2025) and three ‘good’ suitability ponds are present within 250m of the site. A confirmed GCN licence is also present within approximately 100m of the site (approximate due to map scale) (MAGIC, 2025).
- 3.37 There are very limited habitats for GCN present on-site. Due to a lack of optimal habitat and urbanisation of the site, Reasonable Avoidance Measures (RAMs) will be followed as detailed in Section 5 of this report.

Hedgehogs

- 3.38 There are suitable habitats on-site for hedgehog including grassland and hedgerows which provide suitable foraging and commuting habitats. There are 161 known records for hedgehogs approximately within 1km of the site (WSBRC, 2025).
- 3.39 It is considered possible that hedgehogs utilise the site; hedgehogs are a priority species due to their rural population decline (Wembridge, D. *et al*, 2022). Therefore, mitigation for hedgehogs is provided in Section 5 of this report.

Reptiles and common amphibians (herpetofauna)

- 3.40 There are known records for common reptiles and amphibians (herpetofauna) within 1km of the site (WSBRC, 2025), however, there is limited habitat on-site for common reptiles and amphibians and limited connectivity due to the site being surrounded by close-boarded fencing and roads. Therefore, common reptiles and amphibians are not considered likely to be impacted by the proposals and no mitigation is advised for these species.

4. BIODIVERSITY METRIC CALCULATION RESULTS

DEFRA Biodiversity Metric calculation

- 4.1 A DEFRA Biodiversity Metric calculation (Natural England, 2025a) was undertaken to estimate the projected habitat gains / losses from the proposed development. A full copy of the Calculation Tool accompanies this report and must be read in conjunction with this report.

Baseline habitats

- 4.2 A baseline (existing) habitats plan is provided in Appendix E and photographs in Appendix D of this report. Habitat Condition Assessments are provided in Appendix F providing the habitat condition score for each habitat type and habitat parcel recorded on-site.

Relevant date for baseline of the site

- 4.3 The relevant date for the baseline of the site is taken to be the 27th November 2025; no site clearance is believed to have occurred on-site prior to the site visit.

Baseline habitats present on-site

- 4.4 Baseline habitats present within the site are listed in Table 12 below:

Table 12: Baseline habitats present on-site

Habitat type	Habitat parcel reference	Area (ha) / length (km)	Strategic significance	Habitat condition	Habitat units
<i>Area habitats</i>					
Modified grassland	BA-A	0.0346	Area/compensation not in local strategy/ no local strategy	Moderate	0.14
Bramble scrub	BA-B	0.0005	Area/compensation not in local strategy/ no local strategy	n/a	0
Developed land; sealed surface	BA-C	0.0271	Area/compensation not in local strategy/ no local strategy	n/a	0
Total units =					0.14 units
<i>Hedgerow habitats</i>					
Non-native and ornamental hedgerow	BA-H1	0.028	Area/compensation not in local strategy/ no local strategy	Poor	0.03

Habitat type	Habitat parcel reference	Area (ha) / length (km)	Strategic significance	Habitat condition	Habitat units
				Total units =	0.03 units
<i>Watercourse habitats</i>					
n/a	n/a	n/a	n/a	n/a	n/a
				Total units =	n/a

Proposed habitats

- 4.5 A proposed (post-development) habitats plan is provided in Appendix E; proposed on-site habitats are presented in Table 13 below:

Table 13: Proposed habitats on-site

Habitat type	Habitat parcel reference	Area / length	Proposed habitat condition	Criteria targeted	Habitat units
<i>Area habitats</i>					
Artificial unvegetated; unsealed surface	PR-A	0.0091	n/a	n/a	0
Developed land, sealed surface	PR-B	0.0257	n/a	n/a	0
Vegetated garden	PR-C	0.0177	n/a	n/a	0.03
Developed land; sealed surface	BA-C	0.0097	n/a	n/a	0
Total units projected from retained habitats =					0 units
Total units projected from creation =					0.03 units
Total units =					0.03 units
<i>Hedgerow habitats</i>					
n/a	n/a	n/a	n/a	n/a	n/a
<i>Watercourse habitats</i>					
n/a	n/a	n/a	n/a	n/a	n/a

Strategic significance

- 4.9 A search was undertaken on the Local Nature Recovery Strategy (LNRS) for Wiltshire and Swindon 2025 (Wiltshire Council, New Forest National Park & Swindon Borough Councils, 2025) to determine if any proposed habitats are in a strategic area for habitat creation. As the proposed habitats are within a private garden and cannot be legally secured, all proposed habitats were assigned a 'low' strategic significance.

Headline results

- 4.11 The headline results presenting the projected overall net loss/gain for the site is presented in Figure 1 below:

Figure 1: DEFRA Statutory Biodiversity Metric headline results

FINAL RESULTS		
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	-0.11
	Hedgerow units	-0.03
	Watercourse units	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	-75.67%
	Hedgerow units	-100.00%
	Watercourse units	0.00%
Trading rules satisfied?	No - Check Trading Summaries ▲	

Interpretation of results

- 4.12 Based upon the current proposals, there is anticipated to be an overall net change of -0.11 habitat units and -0.03 hedgerow units; this is equivalent to a net % change of -75.67% habitat units and -100% in hedgerow units post-development.
- 4.13 The unit shortfall summary is presented in Figure 2 below which indicates the shortfall required to achieve the mandatory 10% net gain in habitats and hedgerow units.

Figure 2: unit shortfall summary

Tier	Unit Shortfall by Tier	Credits Required
A1	0.12	0.24 ▲
A2	0.00	0.00
A3	0.00	0.00
A4	0.00	0.00
A5	0.00	0.00
H	0.03	0.06 ▲
W	0.00	0.00

- 4.14 The applicant owns no suitable alternative land to provide the required off-site habitats and there is no available area to accommodate additional habitats on-site due to the residential nature of the development.
- 4.15 A 10% net gain cannot be achieved onsite for habitats; therefore, offsite habitat units and/or statutory biodiversity credits will now need to be purchased by the applicant. Further information is provided in Section 5 below.

5. BIODIVERSITY MITIGATION AND ENHANCEMENT PLAN

Biodiversity Net Gain (BNG) – habitat gains/losses

- 5.1 Based upon the current proposals, there is anticipated to be an overall change of -0.11 habitat units and -0.03 hedgerow units; this is equivalent to a net % change of -75.67% in habitat units and -100% in hedgerow units post-development.

Requirements to discharge the biodiversity gain condition of planning permission

- 5.2 The applicant must now purchase habitat units from a local off-site provider or as a last resort purchase statutory biodiversity credits from Natural England to meet the mandatory minimum 10% net gain requirements for habitats units as required under the Environment Act 2021.
- 5.3 The applicant should note that the Spatial Risk Multiplier (SRM) has already been applied to the unit shortfall summary (Section 4 – Figure 2, column 3) and so this represents the number of units needed to be purchased if purchasing statutory biodiversity credits (x 2 multiplier applied).
- 5.4 Both options have been explained below:

Off-site habitat units

- 5.5 Should off-site habitat units be purchased through an off-site provider, an appropriate SRM will be applied depending on where the units are allocated (x 1 for units located within the LPA or National Character Area (NCA) boundary, therefore half of the above units; x 1.5 for units within a neighbouring LPA / NCA boundary, and x 2 if the units are not located within LPA/NCA or neighbouring LPA/NCA boundaries).
- 5.6 The development is anticipated to result in a percentage net change of -75.67% in habitat units -100% in hedgerow units. Off-site habitat units or statutory biodiversity credits will need to be pursued. For statutory biodiversity credits, credits for 0.24 units (Spatial Risk Multiplier (SRM) applied) of 'A1' medium distinctiveness habitats and 0.06 'H' habitats will be required to provide the 10% net gain. A Biodiversity Gain Plan must be submitted to and approved by the Local Authority to discharge biodiversity net gain as a condition of planning permission.
- 5.7 It should therefore be noted that purchasing off-site habitat units will always be the preferred option, and the most economical option as statutory credits are priced above the local market rate.

- 5.8 A copy of the completed SBM calculation tool will need to be submitted to the off-site provider if habitat units are purchased and the off-site provider will need to complete the off-site section of the tool, with the appropriate SRM applied depending on where the purchased habitat units are located. Habitat units can be found online, examples of off-site providers include:

<https://gaiacompany.io/>

<https://environmentbank.com/>

Statutory biodiversity credits

- 5.9 Alternatively, statutory biodiversity credits may be purchased as a last resort. A copy of the calculation tool will need to be submitted to Natural England at the time of buying statutory credits; an estimation of pricing for credits can be found online via the below link, however, a final price will be provided in a quotation once applied for.

<https://www.gov.uk/guidance/estimate-the-cost-of-statutory-biodiversity-credits>

Discharge of biodiversity gain as a condition of planning permission

- 5.10 A biodiversity gain condition is a pre-commencement condition; once planning permission has been granted, a Biodiversity Gain Plan must be submitted to the Local Planning Authority (LPA) by the applicant and approved prior to commencement of the development. The Biodiversity Gain Plan is a mechanism to ensure the post-development biodiversity value of the development's on-site habitat is accurate based on the approved plans and drawings; and any off-site biodiversity gains have been registered and allocated to the development; and/or biodiversity credits, if necessary, have been purchased.

Statutory sites – mitigation

Salisbury Plain SPA

- 5.11 The application site is located within 2.8km of the Salisbury Plain SPA. Salisbury Plain SPA encompasses a vast area of chalk grassland which supports breeding common quail (*Coturnix coturnix*), Eurasian hobby (*Falco subbuteo*), stone-curlew (*Burhinus oedipnemos*) and non-breeding hen harrier (*Circus cyaneus*). The stone-curlew is a ground nesting species which is sensitive to disturbance by people and dogs and is particularly susceptible to recreational pressure.
- 5.12 The Council's Habitats Regulations Assessment (HRA) and Mitigation Strategy for Salisbury Plain SPA (Wiltshire Council, 2018) has identified that residential

developments falling within 6.4km of the SPA have been demonstrated to increase recreational pressures upon these sites and the species using them, through increased visitation and activities such as dog-walking.

- 5.13 Financial contribution is required for this application to ensure the impacts of increased visitor pressures on these sites can be monitored, managed and mitigated for over the lifetime of the development. The Wiltshire Community Infrastructure Levy (CIL) fee will be secured as part of the development and will be calculated at the time of application.

Trowbridge and Westbury Bat Mitigation Strategy

- 5.14 The application site lies within the grey zone of TWBMS. The surrounding landscape of the Trowbridge and Westbury areas are known to support significant roosts for Bechstein's bat and is linked to the Bath and Bradford-on-Avon bat SAC.
- 5.15 Development proposals within the grey zone that are less than 50 dwellings are expected to make a payment for recreational mitigation. A financial contribution of £925 for the one dwelling will be required.

Construction Environmental Management Plan (CEMP)

- 5.16 The Local Wildlife Site 'Westbury Lakes' lies approximately 15m from the site. This site is considered to be of ecological importance, both in its own right and for supporting local fauna including foraging bats, nesting birds and amphibians.
- 5.17 Whilst the proposals are localised, being confined to within the site boundaries, the above site and associated fauna is sensitive to environmental changes, being susceptible to chemical leaching/run-off, dust spill, disturbance and lighting changes. A Construction Environmental Management Plan (CEMP) will therefore be required to mitigate against these impacts, which also incorporates protection measures for fauna and flora within the site.
- 5.18 The CEMP report provided includes specific, detailed measures to address the following impacts:
- ◆ **Noise/vibration:** Noise and vibration will be kept to a minimum to minimise impacts on fauna such as nesting birds and amphibians within the immediate area.

- ◆ **Chemical leaching/run-off:** All plant and machinery will be fitted with drip trays to prevent spillage and ideally no refuelling / storage of chemicals will be permitted on site.
- ◆ **Vegetation clearance / tree pruning and works:** There may be a need for vegetation pruning around the works area. Any proposed works to vegetation will need to account for the potential presence of nesting birds, GCN and common reptiles and amphibians.
- ◆ **Lighting:** To avoid impacts on nocturnal species, no night-time working will be permitted, and this will negate the requirement for any temporary site lighting. Working hours will be from **08:00am to 18:00pm only**.
- ◆ **Siting of site welfare facilities:** Welfare facilities will be sited at the furthest point away from the LWS as practically possible and away from high quality habitats to minimise noise/disturbance.
- ◆ **Dust spill:** Dust spill will be minimized using dust suppression technology fitted on all equipment. This will ensure any airborne dust is kept to a minimum.
- ◆ **Stockpiling of materials:** Any materials required to be stored onsite will be sited at the furthest point away from the western boundary and away from the retained onsite. This will ensure no animals take refuge within them and will ensure protection of these habitats from accidental damage through deliveries.
- ◆ **Heras fencing:** The retained adjacent habitats in the north will be protected pre-commencement of works through Heras fencing which will remain in place throughout construction and only removed upon completion of the works.

Bats

Roosting bats:

- 5.19 The PRA of the shed (B1) and garage (B2) at 115 Station Road was undertaken and no evidence of roosting bats was identified. On this basis, it is considered that bats are likely absent from the buildings and therefore roosting bats are not considered likely to be impacted by the proposed works as shown in this report. The proposed plans do not impact the main house (B3) and so this building was not assessed. **If the plans change and the house will be impacted, then an update survey will be required to assess the house for roosting bats.**

- 5.20 The PRA survey only provides a 'snapshot' in time and does not account for seasonal variation; bats may have been overlooked due to seasonal constraints. Bats are a highly mobile species and as such, it is not possible to have complete certainty that bats are not present, rather, that there was no indication of bats at the time of survey.
- 5.21 The surveys can only be considered valid for 12 months from the survey dates in accordance with the CIEEM Advice Note (CIEEM, 2019). The 12-month period is considered acceptable where the conditions of the buildings on site remain unchanged since the survey and the proposals for the site are unchanged. If any changes to the plans occur, or if 12 months pass and no works have been undertaken, this report and any conclusions provided will not be valid. In this event, it is the responsibility of the applicant to contact ABR Ecology to determine whether an amended report or resurvey of the site is required.
- 5.22 **In the unlikely event bat(s) are encountered at any stage, work must cease immediately and Natural England or a suitably qualified bat ecologist must be sought for advice by the applicant/landowner.** The applicant must be aware of the severe penalties associated with bat crimes and their legal obligation to report this information.
- 5.23 In the event a bat is unexpectedly discovered, the nature of the advice will concern allowing the bat(s) to leave of their own accord or waiting for a licensed person to remove the bat(s). A bat licence may then be deemed necessary following the necessary survey work. **All persons including contractors are explicitly forbidden from handling bats or interfering with bats in any way**

Artificial lighting and bats:

- 5.24 The site is highly likely to support commuting and foraging bats and the site falls within the Bath and Bradford-on-Avon SAC consultation zone (4km greater horseshoe buffer to core roost) and TWBMS grey zone. The following specifications for lighting must be adhered to and are based upon the 'Bats and Artificial Lighting At Night' Guidance Note BN08/23 (BCT & ILP, 2023):
- ◆ Preferably, no new external light fixtures will be installed. If external lighting is required, this will be installed where required for safety purposes only. No external luminaires will be installed where these will cast light spill onto surrounding vegetation, such as mature trees.

- ◆ All luminaries will lack UV elements when manufactured. Metal halide, compact fluorescent sources will not be used.
- ◆ LED luminaires only will be used due to their sharp cut-off, lower intensity, good colour rendition and dimming capability.
- ◆ A warm white light source (2700Kelvin or lower) will be adopted to reduce blue light component.
- ◆ Light sources will feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats (Stone, 2012).
- ◆ Internal luminaires will be recessed only (as opposed to using a pendant fitting) where installed in proximity to windows to reduce glare and light spill.
- ◆ Column heights must be carefully considered to minimise light spill and glare visibility. This must be balanced with the potential for increased numbers of columns and upward light reflectance.
- ◆ Only luminaires with a negligible or zero Upward Light Ratio, and with good optical control, will be used.
- ◆ Luminaires must always be mounted horizontally, with no light output above 90° and/or no upward tilt.
- ◆ External security lighting will be set on motion sensors and set to a one-minute (or less) timer.
- ◆ Bollard or low-level downward-directional luminaires will not be installed. This is due to a considerable range of issues, such as unacceptable glare, poor illumination efficiency, unacceptable upward light output, and increased upward light scatter from surfaces.
- ◆ Only if all other options have been explored, accessories such as baffles, hoods or louvres can be used to reduce light spill and direct it only to where it is needed. However, due to the lensing and fine cut-off control of the beam inherent in modern LED luminaires, the effect of cowls and baffles is often far less than anticipated and must not be relied upon solely.
- ◆ The surrounding habitats will remain at or below 0.5 lux post-development.

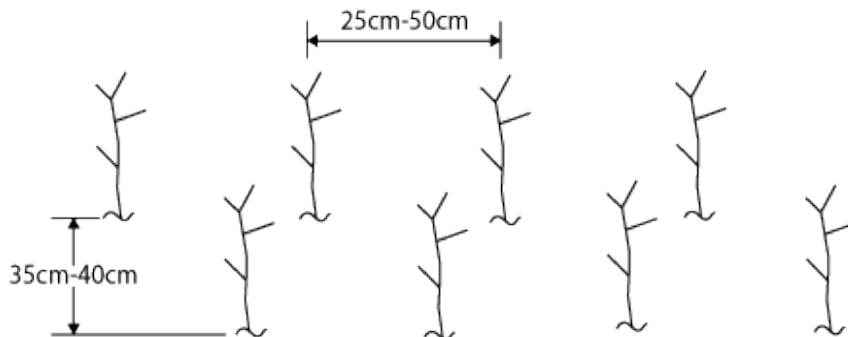
New native hedge planting:

- 5.25 New native species-rich hedgerows will be planted along the north, south and west site boundaries (see Appendix H) to provide mitigation for any impacts on foraging and commuting bats and will comprise a mixture of at least five native, woody species to

provide nesting and foraging habitat for wildlife, species will be selected from the following list:

- ◆ Hawthorn (*Crataegus monogyna*)
- ◆ Spindle (*Euonymus europaeus*)
- ◆ Field maple (*Acer campestre*)
- ◆ Dogwood (*Cornus sanguinea*)
- ◆ Oak (*Quercus sp.*)
- ◆ Hazel (*Corylus avellana*)
- ◆ Elder (*Sambucus nigra*)
- ◆ Crab apple (*Malus sylvestris*)
- ◆ Guelder-rose (*Viburnum opulus*)

5.26 The new hedgerow whips will be sourced from British-grown stock and will be planted between November and March. The whips will be planted in two rows at a density of six plants per 1m approximately 35cm apart. The roots must be kept damp throughout the planting process.



5.27 Biodegradable spiral guards will be required to protect the whips and canes will be used to support the whips and will be removed after 3-5 years. Any new whips will be replaced where they become diseased/die and replaced with plants of the same species and size.

5.28 The existing and retained hedgerows will be retained and managed by the occupiers. This will include watering where necessary. Once the hedgerows have become established, hedgerow cutting will be required to result in good hedge structure.

Great crested newts

5.29 There are four waterbodies within 250m of the site; the site falls within an 'Amber Risk Zone' for GCN (Natural England, 2025), and there are known records and EPS licenses for GCN within 500m of the site (WSBRC, 2025) (MAGIC, 2025). However, there are very limited habitats within the works areas to be impacted and due to the urbanisation of the site, the following Reasonable Avoidance Measures (RAMs) will be followed for site works:

- ◆ Any trenches left overnight will be boarded over or a ramp installed at a 45-degree angle to prevent animals from becoming entrapped.
- ◆ Any materials will be stored on pallets, and any demolition materials will be stored in skips / similar containers rather than in piles on the ground.
- ◆ The ground vegetation within the construction site must be maintained short (<5cm) throughout the works. Any materials must be stored away from the site boundaries which may connect to suitable habitats.
- ◆ Any materials will be removed by hand; if a great crested newt (GCN) is discovered, all works will cease immediately, and the materials replaced. Natural England will be contacted and a licence obtained prior to works proceeding.
- ◆ Excavations and working areas must be managed so as not to create temporary waterbodies which may attract newts onto site.
- ◆ Access into the works area must use the existing road and track and keep habitat disturbance to a minimum, avoiding any areas of potential habitat.

Hedgehogs

5.30 The site has potential to support hedgehog; therefore, the following measures will be followed to ensure hedgehogs are protected during works and to ensure habitat connectivity is maintained:

- ◆ During works, any trenches/pits will be boarded over at the end of each working day or alternatively a 130mm wide ramp/board will be installed at a 45-degree angle in each trench/pit to allow hedgehogs to escape.

- ◆ Materials must be stored on pallets raised off the ground and away from surrounding vegetation to discourage hedgehogs from taking refuge within them.
- ◆ Any new close board fencing and boundaries proposed will feature a minimum of one hedgehog highway (130mm x 130mm hole) along every boundary to ensure habitat connectivity for hedgehogs; this can comprise either a specialised hedgehog highway gravel board or if timber gravel boards are used a custom-made hole (see Appendix H).

Nesting birds

5.31 There is potential for nesting birds to be present within the hedgerow and scrub on-site. Therefore, the following mitigation will apply for works:

- ◆ Any vegetation clearance/trimming works should take place between the start of September and the end of January when birds are least likely to be nesting. However, it must be noted that some species, such as wood pigeons (*Columba palumbus*), nest all year round and so works should proceed with caution during this time.
- ◆ Where this is not possible and works take place between the start of February and end of August, a pre-works check for nesting birds must be undertaken by a suitably experienced ecologist. If an active nest is encountered, all works must cease immediately, and the nest must be left undisturbed. The ecologist will establish a works exclusion zone around the nest, and this will be marked out with hazard tape and signage put up; a second site visit by the ecologist to check nest occupation will be required before works can continue in this area. Works may only continue when the nest is deemed to be unoccupied/no longer active by the ecologist. A camera to monitor nesting activity may be necessary.
- ◆ **If a bird's nest is encountered at any other unsupervised time, all works in the area must cease immediately the ecologist must be contacted immediately to provide further advice.**

Biodiversity enhancements

5.32 Features will be included within the proposed development to enhance the site for biodiversity (Appendix H for plan and specifications). The new dwelling will feature the following:

- ◆ X 1 'Vivara Pro Build-in Woodstone Bat Tube' (<https://www.nhbs.com/ib-vl-05-vivara-pro-build-in-woodstone-batbox>) or similar approved will be installed at the apex of the western elevation of the new dwelling.
- ◆ X 1 'Vivara Pro Woodstone House Sparrow Nest Box' or similar approved (<https://www.nhbs.com/vivara-pro-woodstone-house-sparrow-nest-box>) will be installed at the apex of the eastern elevation of the new dwelling.
- ◆ X 2 'Solitary Bee Bricks' or similar approved (<https://www.nhbs.com/solitary-bee-bricks>) will be installed in the southern elevation of the new dwelling.

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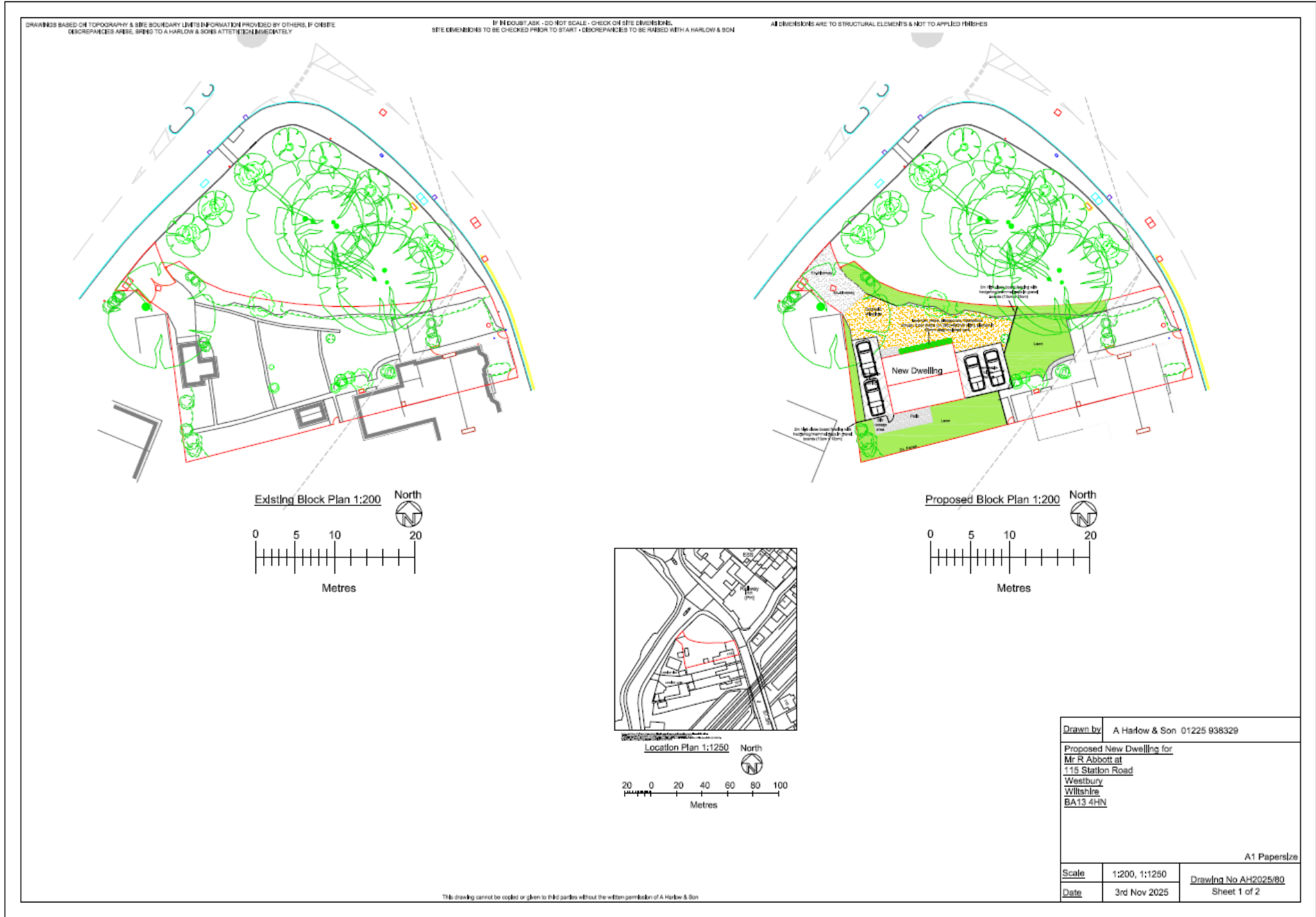
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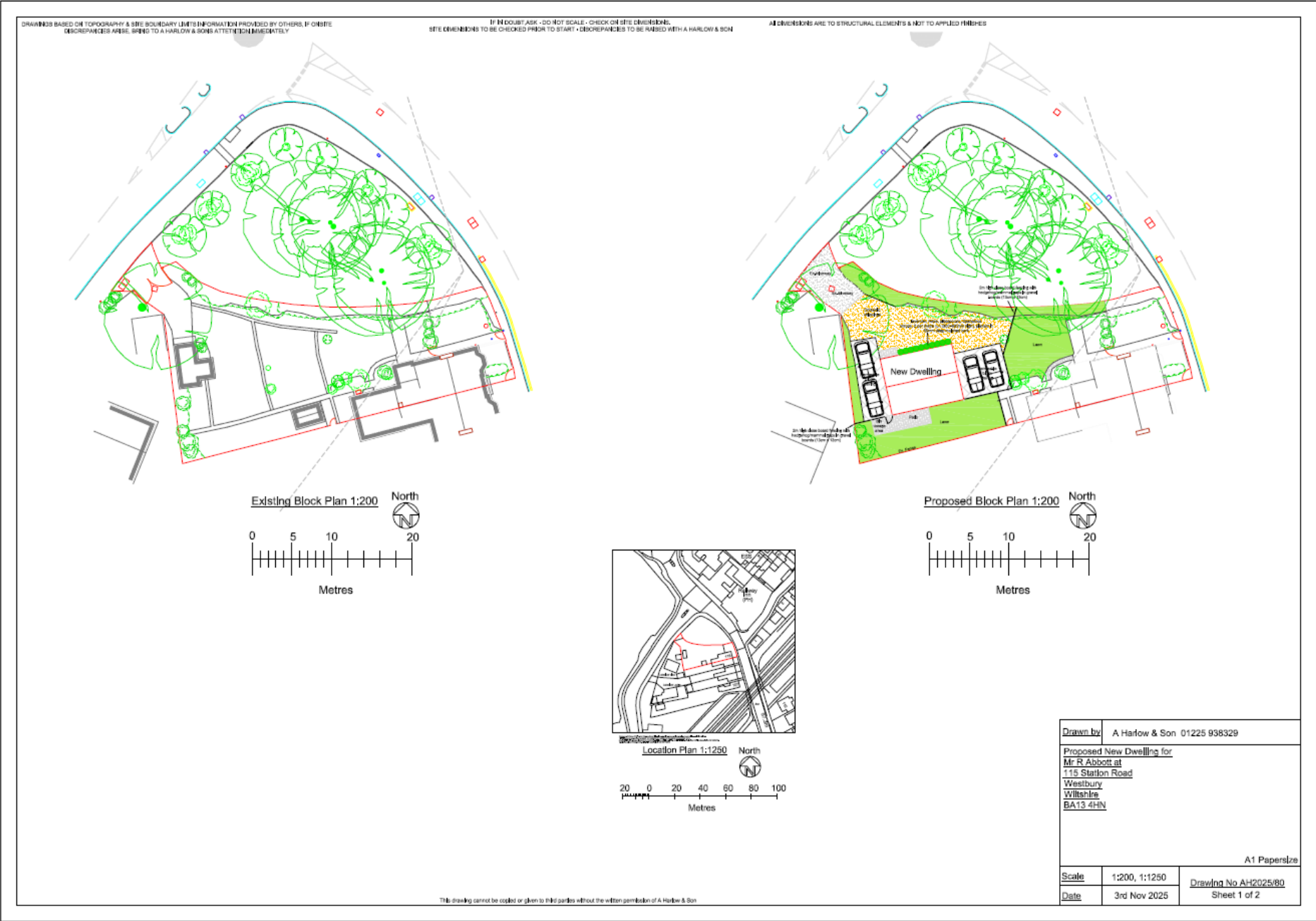
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Appendix A – Existing site plan and proposed block plan



Appendix B – Proposed plans



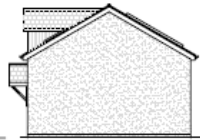
DRAWINGS BASED ON TOPOGRAPHY & SITE BOUNDARY LIMITS INFORMATION PROVIDED BY OTHERS. IF ON SITE DISCREPANCIES ARISE, SEND TO A HARLOW & SON'S ATTENTION IMMEDIATELY

IF IN DOUBT ASK - DO NOT SCALE - CHECK ON SITE DIMENSIONS. SITE DIMENSIONS TO BE CHECKED PRIOR TO START - DISCREPANCIES TO BE RAISED WITH A HARLOW & SON

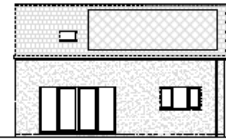
ALL DIMENSIONS ARE TO STRUCTURAL ELEMENTS & NOT TO APPLIED FINISHES



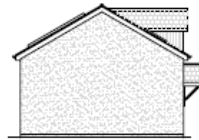
Proposed Front (North) Elevation 1:100
 Walls: Massed
 Windows: 2x10mm glass
 Roof: Slate effect tiles, Halfgrey colour, Anthracite clad dormers
 Windows & Doors: Anthracite upvc
 Rainwater Goods: Upvc



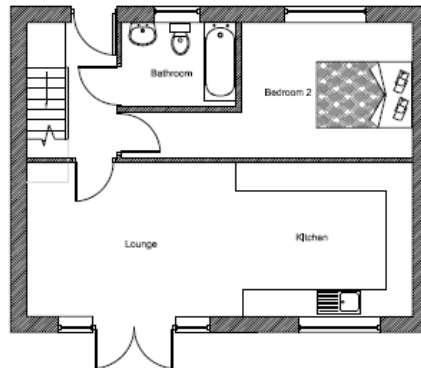
Proposed Side (West) Elevation 1:100



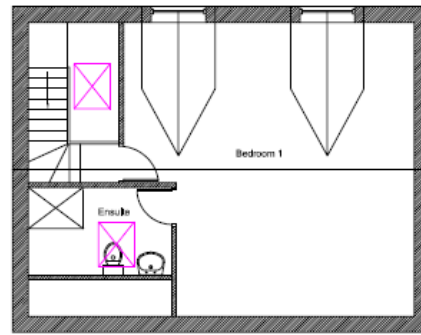
Proposed Rear (South) Elevation 1:100



Proposed Side (East) Elevation 1:100



Proposed Ground Floor Plan 1:50



Proposed First Floor Plan 1:50



Drawn by	A Harlow & Son 01225 938329	
<u>Proposed New Dwelling for</u> <u>Mr R Abbott at</u> <u>115 Station Road</u> Westbury Wiltshire <u>BA13 4HN</u>		
		A1 Paper size
Scale	1:100, 1:50	<u>Drawing No AH2025/80</u> Sheet 2 of 2
Date	3rd Nov 2025	

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Appendix C - Relevant legislation and planning policy

Legislation

Protected species

In England, all bats, dormice *Muscardinus avellanarius*, otters *Lutra lutra*, white-clawed crayfish *Austropotamobius pallipes* and great crested newts *Triturus cristatus* are legally protected under the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.

A number of species are also listed under Annex II of the EC Habitats and Species Directive 1992 due to their rarity, including barbastelle *Barbastella barbastellus*, Bechstein's bat *Myotis bechsteinii*, greater horseshoe *Rhinolophus ferrumequinum*, lesser horseshoe *Rhinolophus hipposideros*, great crested newt, white-clawed crayfish and otter.

The above-named species and adders *Vipera berus*, slow worms *Anguis fragilis*, grass snakes *Natrix natrix*, common lizards *Zootoca vivipara*, common frog *Rana temporaria*, palmate newt *Lissotriton helveticus*, smooth newt *Lissotriton vulgaris*, water voles *Arvicola amphibius* and several invertebrate species are also protected under Schedule 5 of the Wildlife and Countryside Act (WCA) 1981 (as amended).

Schedule 9 of the WCA 1981 includes non-native, invasive species including (but not limited to) Himalayan balsam *Impatiens glandulifera* and signal crayfish *Pacifastacus leniusculus*. Badgers *Meles meles* are legally protected under The Protection of Badgers Act (1992).

All birds, their nests and eggs are protected under Section 1 of The WCA 1981 (as amended) and it is thus an offence, to intentionally kill, injure or take any wild bird; intentionally take, and damage or destroy the nest of any wild bird while it is in use or being built.

Some wild bird species, such as barn owls *Tyto alba*, are afforded additional protection under Schedule 1 of the WCA 1981 (as amended). This legislation makes the disturbance of any wild bird included in Schedule 1 illegal while it is building a nest or is in, on or near a nest containing eggs or young: or disturbance of dependent young of such a bird.

Certain species are listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 as species of 'principal importance' (JNCC, 2007) such as hedgehog *Erinaceus europaeus*, due to their national decline; under Section 40, Local Planning Authorities have a duty to conserve these species.

Protected habitats and sites

A number of sites designated for nature conservation are afforded legal protection due to being of international importance. The UK National Sites Network includes Special Protection Areas (SPAs) for birds and Special Areas of Conservation (SACs) for habitats; Ramsars, designated for important wetland habitats, do not form part of the National Sites Network but are protected in the same way.

Habitats listed under Annex I of the EC Habitats and Species Directive 1992 are included due to their rarity and importance to the maintenance of protected species populations. Examples include estuaries, northern Atlantic wet heaths with *Erica tetralix*, and blanket bogs.

Other nationally protected sites include Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNRs) Local Nature Reserves (LNRs) and Protected Road Verges which are designated under the WCA 1981 and strengthened by the NERC Act 2006.

Several habitats are listed under Section 41 of the NERC Act 2006 including certain hedgerows, arable field margins, grassland, fen, swamp, marine habitats, woodlands and rivers.

Biodiversity Net Gain (BNG) – The Environment Act 2021

Part 6 Schedule 14 of the Environment Act 2021 ‘Biodiversity Gain as Condition of Planning Permission’ mandates a minimum 10% measurable habitat net gain for all major and minor planning applications (with certain applications being exempt). Under Sch. 14, there is a legal requirement to deliver a minimum 10% measurable habitat net gain value post-development compared to the measured pre-development value of a site, as measured using the national DEFRA Biodiversity Metric calculation tool.

This legislation was enacted into law on 12th February 2024 for major applications and 2nd April 2024 for minor applications. For all applications subject to mandatory BNG, a biodiversity gain condition must be discharged through submission of a Biodiversity Gain Plan to the relevant Local Planning Authority detailing how the development has met the minimum 10% net gain objective. Offsite habitats and significant onsite habitat enhancements are subject to a minimum of 30 years maintenance under the Act.

National and local planning policy

The National Planning Policy Framework (NPPF)

The National Planning Policy Framework (NPPF) (Department for Levelling Up, Housing & Communities, 2024) sets out the Government’s planning policies for England and how these should be applied. In the context of this report, Section 15 of NPPF is relevant and applicable, Section 15 states:

‘Planning policies and decisions should contribute to and enhance the natural environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.’

New developments and projects are supported where plans promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue measurable net gains for biodiversity.

To ensure this application is compliant with Section 15 of NPPF, enhancements for biodiversity, such as the inclusion of bat roosting and/or bird nesting boxes, are required as part of the development.

Wiltshire Core Strategy

The Wiltshire Core Strategy (Wiltshire Council, 2015) was adopted in January 2015 and includes the following relevant policy:

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 [refer to full strategy for details] 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.

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:

- i. cannot reasonably be avoided*
- ii. are reduced as far as possible*

- iii. *are outweighed by other planning considerations in the public interest*
- iv. *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.

It is the applicant's/landowner's responsibility to ensure that the proposed development proceeds in full compliance with this report and/or any update version report thereafter, that works are undertaken lawfully, in compliance with national and local policy, and in accordance with all conditions of the obtained planning consent(s).

Appendix D - Photographs



Photo 1: Bramble scrub (h3d) in southwest of the site.



Photo 2: Shed (B1) in the south of the site.



Photo 3: Shed (B1) in the south of the site.



Photo 4: Garage (B2) present in the west of the site.



Photo 5: North elevation of garage (B2) in west of site.



Photo 6: Inside garage (B2).



Photo 7: Conservatory on garage (B2).



Photo 8: Modified grassland (g4 108) across the site.



Photo 9: Non-native hedgerow (h2b) present in north of site.



Photo 10: Non-native hedgerow (h2b) present in north of site.



Photo 11: Hardstanding (u1b6) driveway in northwest of the site.



Photo 12: 'Pond 3' (Westbury Lakes LWS).

Appendix E – Pre- and post-development habitat plans & floral species lists

Baseline habitats plan



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Species lists for habitats:

Common name	Scientific name	DAFOR scale abundance
Modified grassland (g4 104 108):		
Apple tree	<i>Malus domestica</i>	Rare
Cat's ear	<i>Hypochaeris radicata</i>	Occasional
Chervil	<i>Anthriscus cerefolium</i>	Locally frequent
Chickweed	<i>Stellaria media</i>	Locally occasional
Cleavers	<i>Gallium aparine</i>	Locally occasional
Cock's foot	<i>Dactylis glomerata</i>	Frequent
Common ragwort	<i>Jacobaea vulgaris</i>	Locally occasional
Creeping buttercup	<i>Ranunculus repens</i>	Locally abundant
Creeping cinquefoil	<i>Potentilla reptans</i>	Locally frequent
Creeping thistle	<i>Cirsium arvense</i>	Rare
Daisy	<i>Bellis perennis</i>	Locally abundant
Dandelion	<i>Taraxacum sp.</i>	Occasional
Dove's-foot crane's-bill	<i>Geranium molle</i>	Locally abundant
Ivy	<i>Hedera helix</i>	Locally occasional
Perennial rye-grass	<i>Lolium perenne</i>	Abundant
Red fescue	<i>Festuca rubra</i>	Locally dominant
Self-heal	<i>Prunella vulgaris</i>	Locally occasional
Springy turf-moss	<i>Rhytidiadelphus squarrosus</i>	Dominant
White clover	<i>Trifolium repens</i>	Frequent
Wood avens	<i>Geum urbanum</i>	Locally occasional
Yarrow	<i>Achillea millefolium</i>	Locally abundant
Yorkshire fog	<i>Holcus lanatus</i>	Locally frequent
Bramble scrub (h3d):		
Bramble	<i>Rubus fruticosus</i>	Dominant
Ivy	<i>Hedera helix</i>	Frequent
Nettle	<i>Urtica dioica</i>	Abundant
Non-native ornamental hedgerow (h2b 523):		
Blackthorn	<i>Prunus spinosa</i>	Rare
Bramble	<i>Rubus fruticosus</i>	Occasional
Cleavers	<i>Gallium aparine</i>	Occasional
Creeping cinquefoil	<i>Potentilla reptans</i>	Occasional
Forsythia species	<i>Forsythia sp.</i>	Rare
Garden privet	<i>Ligustrum ovalifolium</i>	Occasional
Holly	<i>Ilex aquifolium</i>	Rare
Honeysuckle	<i>Lonicera periclymenum</i>	Occasional
Ivy	<i>Hedera helix</i>	Occasional
Lawson's cypress	<i>Chamaecyparis lawsoniana</i>	Occasional
Leyland cypress	<i>Cupressocyparis leylandii</i>	Occasional
Walnut	<i>Juglans regia</i>	Rare
Yucca	<i>Yucca sp.</i>	Rare

Post-development habitats plan



Legend

- Red Line Boundary
- Buildings

Habitats

- Artificial unvegetated, unsealed surface
- Developed land; sealed surface
- Vegetated garden

Secondary codes:	Description:
828	Vegetated garden

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Appendix F – Habitat Condition Assessments

Condition Sheet: GRASSLAND Habitat Type (low distinctiveness)			
UKHab Habitat Type:			
Grassland - Modified grassland			
UKHab – see UK Habitat Classification			
On-site or off-site, site name and location:	On-site	Survey date and surveyor name:	Sophie Morris and Zoe Barrett – 27/11/2025
Central grid reference of habitat:	ST 86503 51835	Habitat parcel reference:	BA-A
Survey reference (if relating to a wider survey):	-	Limitations (if applicable):	
Condition Assessment Criteria		Condition Achieved (Y/N)	Notes/Justification
A	There are 6-8 vascular plant species per m² present, including at least 2 forbs (these may include those listed in Footnote 1). Note - this criterion is essential for achieving Moderate or Good condition. Where the vascular plant species present are characteristic of medium, high or very high distinctiveness grassland, or there are 9 or more of these characteristic species per m² (excluding those listed in Footnote 1), please review the full UKHab description to assess whether the grassland should instead be classified as a higher distinctiveness grassland. Where a grassland is classed as medium, high, or very high distinctiveness, please use the relevant condition sheet.	Y	Average of 6.5 species per meter squared.
B	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed.	N	Uniformly mown.
C	Any scrub present accounts for less than 20% of the total grassland area. (Some scattered scrub such as bramble <i>Rubus fruticosus</i> agg. may be present). Note - patches of scrub with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.	Y	Small area of scrub accounted for as a separate parcel and not 20%.
D	Physical damage is evident in less than 5% of total grassland area. Examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities.	N	Pathways and grassland have been dug up.
E	Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens) ² .	Y	Bare ground is below 10%.
F	Cover of bracken <i>Pteridium aquilinum</i> is less than 20%.	Y	No bracken present.
G	There is an absence of invasive non-native plant species ³ (as listed on Schedule 9 of WCA ⁴).	Y	No invasive non-native species present.
Essential criterion achieved (Yes or No):			Yes
Number of criteria passed:			5
Condition Assessment Result (out of 7 criteria)		Condition Assessment Score	Score Achieved ×/✓
Passes 6 or 7 criteria including passing essential criterion A		Good (3)	

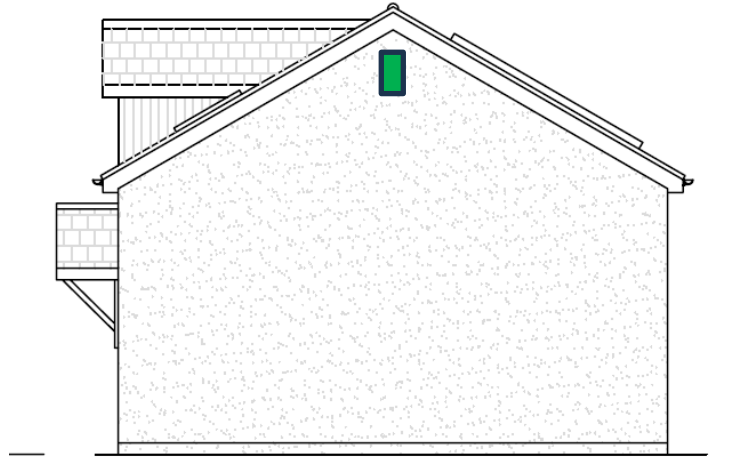
Passes 4 or 5 criteria including passing essential criterion A	Moderate (2)	✓
Passes 3 or fewer criteria; OR Passes 4 - 6 criteria (excluding criterion A)	Poor (1)	
Suggested enhancement interventions to improve condition score		
Footnotes:		
Footnote 1 – Creeping thistle <i>Cirsium arvense</i>, spear thistle <i>Cirsium vulgare</i>, curled dock <i>Rumex crispus</i>, broad-leaved dock <i>Rumex obtusifolius</i>, common nettle <i>Urtica dioica</i>, creeping buttercup <i>Ranunculus repens</i>, greater plantain <i>Plantago major</i>, white clover <i>Trifolium repens</i> and cow parsley <i>Anthriscus sylvestris</i>. Footnote 2 – For example, this could include small, scattered areas of bare ground allowing establishment of new species, or localised patches where not exceeding 10% cover. Footnote 3 – Assess this for each distinct habitat parcel. If the distribution of invasive non-native species varies across the habitat, split into parcels accordingly, applying a buffer zone around the invasive non-native species with a size relative to its risk of spread into adjacent habitat, using professional judgement. Footnote 4 – Wildlife and Countryside Act 1981 (as amended).		

Appendix G – Pond map



Appendix H – Biodiversity mitigation and enhancement plan

One 'Vivara Pro Build-in Woodstone Bat Tube' will be installed at the apex of the western elevation as close to eaves level as possible. Ensure artificial lighting is a minimum of 5m away from the roost.

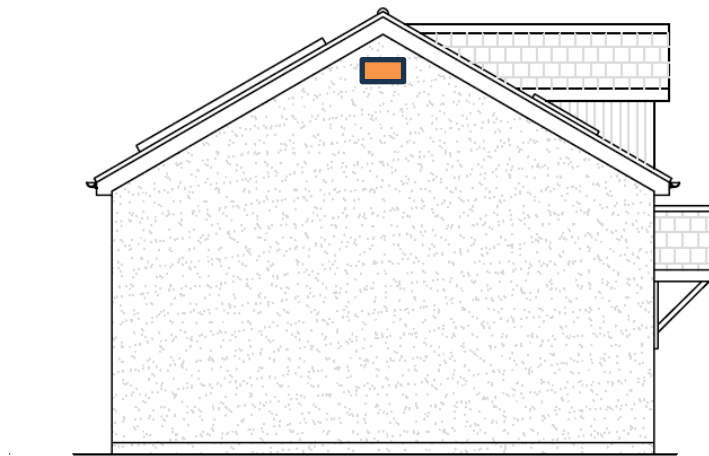


Proposed Side (West) Elevation 1:100

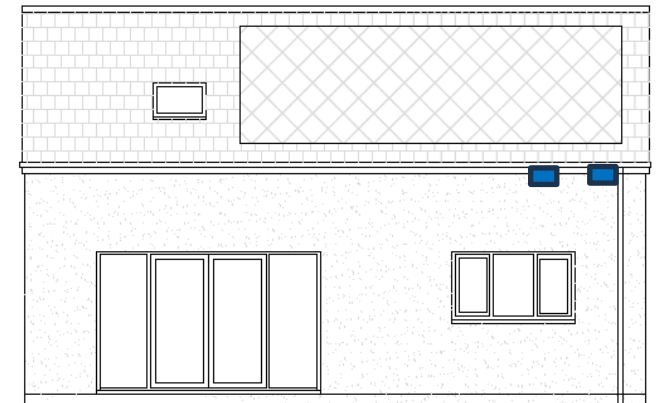
Two 'solitary bee bricks' will be installed in the southern elevation of the new dwelling at least 1m above the ground.



One 'Vivara Pro Woodstone House Sparrow Nest Box' will be installed at the apex of the eastern elevation as close to eaves level as possible.



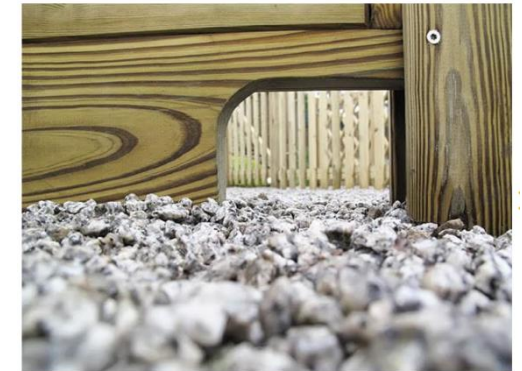
Proposed Side (East) Elevation 1:100



Proposed Rear (South) Elevation 1:100



Any new close board fencing and boundaries proposed will feature a minimum of one hedgehog highway (130mm x 130mm hole) along every boundary.



New native species-rich hedgerow planting on the north, south and west boundaries of the site.