

Ecological Impact Assessment



London Road, Devizes , Wiltshire
23rd February 2026



**Tyler
Grange**

TG Report No. 17700_R01a_VKC

Project No:	Report No.	Date	Revision
17700	R02	23 rd February 2026	A
BNG QA	Author	Checked	Approved
AH	Vicky King-Cline MSc BSc Hons	Harry Du Bois-Jones BSc Hons	Paul Webb MSc BSc (Hons)

Disclosure:

This report, all plans, illustrations, and other associated material remains the property of Tyler Grange Group Ltd until paid for in full. Copyright and intellectual property rights remain with Tyler Grange Group Ltd.

The contents of this report are valid at the time of writing. Tyler Grange shall not be liable for any use of this report other than for the purposes for which it was produced. Owing to the dynamic nature of ecological, landscape, and arboricultural resources, if more than twelve months have elapsed since the date of this report, further advice must be taken before you rely on the contents of this report. Notwithstanding any provision of the Tyler Grange Group Ltd Terms & Conditions, Tyler Grange Group Ltd shall not be liable for any losses (howsoever incurred) arising as a result of reliance by the client or any third party on this report more than 12 months after the date of this report.



Contents:

Summary

Section 1: Introduction and Context	5
Section 2: Ecological Features and Evaluation	9
Section 3: Ecological Impacts, Compensation, Mitigation, and Enhancement	22
Section 4: Biodiversity Net Gain	25
Section 5: Conclusions	34

Appendices:

Appendix 1: Soft Landscape Proposals
Appendix 2: Proposed Masterplan
Appendix 3: Legislation and Planning Policy
Appendix 4: Methodology
Appendix 5: Reptile Survey Methodology and Results

Plans:

Plan 1: Bat Survey Plan 17700/P01a
Plan 2: Habitat Features Plan 17700/P02a
Plan 3: Habitat Features Plan – Pre 2024 Estate Management 17700/P03a



Summary

- S.1. This report has been prepared by Tyler Grange Group Limited on behalf of Highgrove Group (Reading) Limited on behalf of PRZM Real Estate ('PRZM') and Aldi Stores Ltd ('Aldi'). It sets out the findings of an Ecological Impact Assessment at Devizes, Wiltshire, SN10 2EY (OS Grid Reference SU 02414 63086), hereinafter referred to as 'the site'. The proposals are for the erection of a new Class E(a) discount food store, a drive thru unit with EV charging hub with associated parking, servicing and hard & soft landscaping.
- S.2. An 'extended' Phase 1/UK Habitat Classification (UKHabs) survey and Preliminary Roost Assessment were undertaken on Tuesday 11th February 2025. A summary of the results are as follows:
- The site comprises previously developed land, is predominantly hard surfaced (concrete and tarmac) and contains a number of buildings including a teaching unit, W.C. block, a set of garages and a storage cabin, bare ground and ephemeral vegetation of negligible ecological importance, and a native hedgerow of local ecological importance;
 - The site is currently in operation as a motorcycle training facility, which utilises the extensive areas of hardstanding that make up the site;
 - Site maintenance / clearance works predominantly to the existing hardstanding areas of the site had taken place after the nesting bird season in 2024 and before the ecology site visit in Q1 2025. This has been documented within this report and in the Biodiversity Net Gain assessment;
 - The remaining habitats, namely native hedgerow offers habitat that could support common and widespread nesting and foraging birds.
- S.3. In terms of protected sites, the data search returned two statutory sites within 10 km of the site boundary and three non-statutory sites within 2km of the site boundary. It is considered the site will have no adverse effects on these sites, due to the distance between the sites and the lack of habitat connectivity.
- S.4. The site is within the catchment of the River Avon Special Area of Conservation (SAC) Hampshire, which for some developments requires nutrient neutrality including Phosphorus calculations to be submitted as part of the planning application. Information returned from the Pre-application service with Wiltshire Council - ENQ/2025/01219 stated: *'Since the proposal that is subject of this enquiry will not increase the number of overnight accommodations in the catchment, there is no mechanism for adverse effect. This proposal would likely be screened out of Appropriate Assessment within the planning process'*. Therefore, no calculations or further commentary on mitigation for nutrient neutrality are anticipated to be required.
- S.5. Habitats of negligible ecological importance to be lost to the development, namely the previously developed land, require no specific mitigation. Habitats of local ecological importance to be lost, namely the native hedgerow, will be compensated for through replacement planting in the form of native tree, hedgerow and grassland planting.



- S.6. With regard to the biodiversity net gain, the post-development proposals end with a net loss of – 89.35% of habitat units (4.15 units) and a net gain of 37.01% of hedgerow units on site. However due to the baseline featuring hedgerow associated with a bank 0.97 units are required to meet trading rules. In order to achieve a net gain of 10% in habitat units, and satisfy trading rules, an off-site contribution (of 4.61 habitat units and 0.97 Hedgerow units) will be required, to be agreed through a Section 106 agreement or other appropriate planning mechanism, as detailed in **Section 4**.
- S.7. The mitigation and enhancement recommendations throughout this report can be actioned through the production of a Construction Environmental Management Plan (CEMP) and a Habitat Management and Monitoring Plan (HMMP). These can be secured through suitably worded planning conditions.



Section 1: Introduction and Context

Introduction

- 1.1. This report has been prepared by Tyler Grange Group Ltd on behalf of PRZM and Aldi. It sets out the findings of an Ecological Impact Assessment for the site. See **Figure 1.1** for the indicative site boundaries.
- 1.2. This assessment has been undertaken to inform a Hybrid planning application for the full application of a new Aldi discount food store with related parking and soft landscaping, and the outline application for a drive thru unit and EV charging hub. The soft landscape proposals for the full application of the Aldi are shown in **Appendix 1**. The Masterplan which includes the proposed outline proposals is included within **Appendix 2**.



Figure 1.1: Indicative red line boundary denoting the approximate boundary for the detailed application of the Aldi element of the scheme and the Green line denoting the approximate boundary of the outline application drive thru and EV charging hub element of the scheme, (© Google Aerial Imagery 2025)



Site Context

- 1.3. The total hybrid application area measures approximately 1.4 ha with the detailed application for the Aldi representing 1.01 ha and the outline for the drive thru and EV charging hub representing approximately 0.39 ha. The site comprises a mixture of predominantly hardstanding and buildings, sealed surface, neutral grassland, bare ground, ephemeral vegetation and a native hedgerow comprising hazel *Corylus avellana* trees with plum *Prunus domestica* and goat willow *Salix caprea* along the southern border. The immediate adjacent habitat comprises roads to the north and south and a car garage, petrol station and car wash to the west. Further afield is a residential area to the south, industrial buildings to the north and carpark to the west. To the east lies a field that has outline planning approval for a 25,000 sqm commercial development.

Purpose

- 1.4. This report, has been prepared using published guidance for EclA, its purpose is as follows:
- Uses available background data and results of the field surveys to describe and evaluate the ecological features present within the likely “Zone of Influence”^{1 2} (Zoi) of the proposed development;
 - Describes the actual or potential ecological issues and opportunities that might arise as a result of the site’s development;
 - Where appropriate, makes commitments for mitigation measures for adverse effects on ecological features as well as ecological enhancements, to ensure conformity with policy and legislation listed in **Appendix 3**;
 - Includes a Biodiversity Net Gain (BNG) assessment of the proposed development; and
 - Can be used to inform a planning application for the site’s development.

Methodology

- 1.5. The data search was based on records purchased from Wiltshire and Swindon Biological Records Centre (WSBRC), as well as data from the Multi-Agency Geographic Information for the Countryside (MAGIC)³.
- 1.6. Detailed methodologies for the data search, UK Habitat Classification (UKHab) survey, Preliminary Roost Assessment (PRA), bat emergence survey and BNG assessment are detailed in **Appendix 4**.

¹ CIEEM (2018) *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine*. Chartered Institute of Ecology and Environmental Management, Winchester.

² Defined as the area over which ecological features may be affected by biophysical changes as a result of the proposed project and associated activities. This is likely to extend beyond the project site, for example where there are ecological or hydrological links beyond the site boundaries.

³ <https://magic.defra.gov.uk/magicmap.aspx> [Accessed 02/09/2025]



- 1.7. The methodology and the terminology used to inform this impact assessment are consistent with published guidance^{4 5}. A full methodology is set out in **Appendix 4**.

Quality Control

- 1.8. All ecologists at Tyler Grange Group Limited are members of the Chartered Institute of Ecology and Environmental Management (CIEEM) or are working towards membership, and act under the direction of members and abide by the Institute's Code of Professional Conduct⁶.

Limitations and Assumptions

- 1.9. Ecological survey data is typically valid for up to 18 months unless otherwise specified, for example if conditions are likely to change more quickly due to ecological processes or anticipated changes in management⁷.
- 1.10. Records held by local biological record centres and local recording groups are generally collected on a voluntary basis; therefore, the absence of records does not demonstrate the absence of species, it may simply indicate a gap in recording coverage. These records alongside professional judgement have been made to assess the likelihood that habitats on site are suitable for certain species.
- 1.11. Protected species surveys undertaken were within optimal timeframes and conditions, and as such, the results are not considered to be subject to any limitations relating to timings or conditions.
- 1.12. If any documents are specified by the local planning authority that would result in the Strategic Significance scores changing, the results of the SBM would also change.
- 1.13. A section of proposed footpath along the A361 and then turning into Waller Road was added into the site designs at a late stage, after ecology surveys had been completed. The area affected is immediately adjacent to the road, and shown to be regularly managed as amenity grassland, as such the lack of first hand survey data is not seen as a limitation.
- 1.14. The site was subject to estate management after the nesting bird season in 2024 as part of its ongoing use as a Motorbike training area. Pers comms Matthew Anderson (PRZM). The estate management involved site maintenance / clearance works predominately to the existing hardstanding areas of the site, which also resulted in the removal of some on-site habitat prior to surveys being undertaken in Q1 2025 to establish their baseline condition. Habitats affected were largely mixed scrub and an area of what is described as young broadleaved woodland. Offsite habitats in the ownership of the adjacent garage to the south west of the site have also been cleared. This was not part of the aforementioned estate management, and is understood to have been undertaken separately by the neighbouring landowners.

⁴ CIEEM (2017) *Guidelines for Preliminary Ecological Appraisal*, 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.

⁵ CIEEM (2018) *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine*, CIEEM, Winchester.

⁶ CIEEM (2022) *Code of Professional Conduct*. CIEEM, Winchester.

⁷ CIEEM (2019) *On the Lifespan of Ecological reports and surveys*, CIEEM, Winchester



- 1.15. In accordance with paragraphs 6 and 6B of the Town and Country Planning Act 1990⁸, (See **Appendix 3**):

"the pre-development biodiversity value of the onsite habitat is to be taken to be its biodiversity value immediately before the carrying on of the activities."

- 1.16. And in accordance with the Planning Practice Guidance: Biodiversity Net Gain⁹ (Paragraph 036 Reference ID: 74-036-20240214):

"If there has been degradation and there is insufficient evidence about the biodiversity value of the onsite habitat immediately before the degradation, the pre-development biodiversity value of the onsite habitat must be taken to be the highest biodiversity value of the habitat which is reasonably supported by any available evidence relating to it"

- 1.17. Therefore, where there is insufficient evidence of the site's value prior to degradation, it must be assumed that the habitat had the highest biodiversity value reasonably supported by available evidence immediately before the damaging activity took place.

- 1.18. For the outline element of the application, post development habitats have been determined based on the masterplan proposals. Given the outline nature of these proposals the proposed habitats have assessed on a precautionary basis, it is anticipated that an update assessment for the Reserved Matters may result in changes to the proposals and which may require additional mitigation for BNG.

- 1.19. Habitat areas and lengths have been measured manually using QGIS and therefore have been measured as accurately as practicably possible.

⁸ **Town and Country Planning Act 1990**, Sections 6 and 6B (as inserted by the Environment Act 2021, Schedule 14). Available at: <https://www.legislation.gov.uk/ukpga/1990/8/section/6> and <https://www.legislation.gov.uk/ukpga/1990/8/section/6B> [Accessed 27 May 2025].

⁹ Department for Levelling Up, Housing and Communities (DLUHC), *Planning Practice Guidance: Biodiversity Net Gain*, Paragraph 036, Reference ID: 74-036-20240214. Available at: <https://www.gov.uk/guidance/biodiversity-net-gain> [Accessed 27 May 2025].



Section 2: Ecological Features and Evaluation

Zone of Influence ('Zol')

2.1. For the purpose of this report the Zol for ecological receptors is generally taken as follows:

- 10 km for statutory designated sites of international importance;
- 2 km for statutory designated site of national importance;
- 2 km for protected and priority species;
- Within and directly adjacent to the site for habitats.



Designated Sites

2.2. The data search returned two National Site Network (NSN) sites and no Ramsar sites within 10 km of the site, and three non-statutory designated sites within 2 km of the site. These are detailed in **Table 2.1** below.

Table 2.1. Designated Sites.

Designated site	Distance and direction from site	Citation	Ecological Importance
Pewsey Downs (SAC)	6.73 km east	Pewsey Downs SAC is designated for its internationally important orchid-rich chalk grasslands and its population of the rare Early Gentian <i>Gentianella anglica</i> . The site's steep, nutrient-poor chalk slopes support a diverse range of plant species and butterflies, making it one of the finest examples of calcareous grassland in southern England.	International
Salisbury Plain (SAC)	7.66 km south	Salisbury Plain is designated as a Special Area of Conservation (SAC) due to its extensive semi-natural dry grasslands and lowland juniper <i>Juniperus communis</i> scrub on chalk soils. It is the largest surviving area of this habitat type in the European Union, making it the most important site for calcareous grassland in the UK. The site supports diverse grassland communities, including rare types such as CG7 <i>Festuca ovina</i> – <i>Hieracium pilosella</i> – <i>Thymus praecox</i> and CG6 <i>Avenula pubescens</i> , and is recognised as an important orchid-rich habitat. Additionally, Salisbury Plain hosts significant populations of the marsh fritillary butterfly <i>Euphydryas aurinia</i> , which breeds in its dry calcareous grasslands.	International
Roundway Down and Covert (SSSI)	1.61 km northwest	Roundway Down and Covert SSSI is designated for its species-rich chalk grassland, supporting rare plants like bastard toadflax <i>Thesium humifusum</i> , early gentian <i>Gentianella anglica</i> , and field fleawort <i>Tephrosia integrifolia</i> . The site also hosts over 30 butterfly species, making it a key area for biodiversity conservation in Wiltshire.	National
Kings Play Hill (SSSI)	2.9 km north	King's Play Hill is designated as a Site of Special Scientific Interest (SSSI) due to its biological significance, particularly its calcareous grassland habitat which supports a rich diversity of plant species and associated wildlife. The site was notified in 1971 for its high-quality ecological features typical of chalk downland	National
Morgan's Hill (SSSI)	3.8 km north	Morgan's Hill is designated as a Site of Special Scientific Interest (SSSI) for its outstanding chalk grassland habitat, which supports a rich variety of rare and nationally important plant species, including several orchids such as fly orchid <i>Ophrys insectifera</i> , fragrant orchid <i>Gymnadenia conopsea</i> , and marsh helleborine <i>Epipactis palustris</i> . The site also provides vital habitat for butterflies like the Adonis blue <i>Lysandra bellargus</i> , chalkhill blue <i>Lysandra coridon</i> , and the endangered marsh fritillary <i>Euphydryas aurinia</i> . Its ecological value is further enhanced by the presence of all three native UK conifers and a diverse range of wildflowers and moths.	National
Lay Wood (Local wildlife site)	0.4 km south	A small, isolated and unmanaged wet woodland dominated by Alder lying adjacent to the Kennet and Avon Canal, with some impressively large Oak standards and Alder and Ash coppice stools.	Local
Kennet & Avon Canal (LWS)	0.54 km south	A restored canal much used for.	Local
Roundway Plantation (LWS)	1.32 km north	Unimproved grassland on an unmanaged chalk site.	Local

2.3. The site falls into the catchment area of the River Avon SAC (Hampshire) which has requirements for some development to input into a nutrient neutrality assessment. Information returned from the Pre-application service with Wiltshire Council - ENQ/2025/01219 stated: 'Since the proposal that is subject of this enquiry will not increase the number of overnight accommodations in the catchment, there is no mechanism for adverse effect. This proposal would likely be screened out of Appropriate Assessment within the planning process'. Therefore, no calculations or further commentary on mitigation for nutrient neutrality are anticipated to be required for the proposals.



Habitats and Flora

2.4. The habitats present on site are summarised below in **Table 2.2**, along with a description of the composition of the main plant species present and an assessment of their ecological importance. The location of habitats are shown on the Habitats Features Plan **17700/P02**.

Table 2.2. Habitats and Flora

Habitat	Description and Species	Ecological Importance	Photograph
Sealed surface/Bare ground	Part of the site comprises what looked to be soil over sealed surface where the young broadleaved woodland was previously present (see pre-site clearance images).	Sealed Surface/bare ground has no inherent ecological value and is therefore considered to be of negligible ecological importance.	
Grassland – Other Neutral Grassland	A Road verge that was previously outside of the site boundary has recently been brought into it. Whilst management is intermittent on the verge, it looks to contain a range of species with the grasses dominated by false oat grass <i>Arrhenatherum elatius</i> and has precautionarily been assessed as Other neutral grassland.	Small sections of other neutral grassland such as this road verge are common in the landscape. The flora in the grassland is unlikely to support any species of value and as such is of negligible ecological importance.	 (© Google Streetview Imagery, Image captured June 2025, accessed February 2026)
Grassland – Modified Grassland	A small section of modified grassland lies within the site boundary, adjacent to the north of the A361 towards Waller Road.	Modified grassland is common in the wider landscape and in the UK overall. The flora within the grassland is highly unlikely to support any species of value and as such is of negligible ecological importance.	 (© Google Streetview Imagery Image captured June 2025, accessed February 2026)



Ephemeral vegetation	Within the site are areas of ephemeral vegetation where grassland and scrub habitats were previously present prior to the 2024 estate management.	This habitat is very common in the wider landscape and in the UK overall. The flora within the ephemeral vegetation does not support any species of value and as such is of negligible ecological importance.	
Developed land; sealed surface – Buildings	There are a number of buildings present within the site boundary including a teaching unit, W.C. block, a set of garages and a storage cabin, shown as B1 and B2 on plan 17700/P02. The suitability of these buildings to support roosting bats is described in Table 2.4 below.	Buildings have no inherent ecological value and are therefore considered to be of negligible ecological importance.	
Developed land; sealed surface – Hardstanding	A majority of the site comprises hardstanding.	As hardstanding provides no inherent ecological value, it is of negligible ecological importance.	

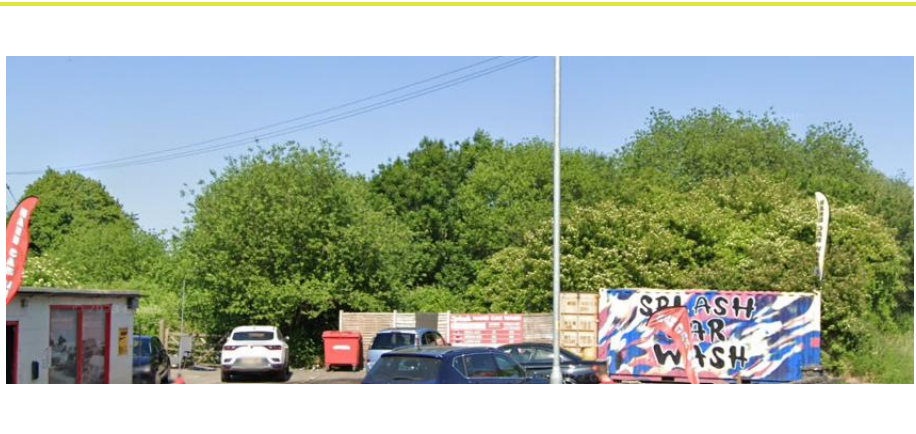


Native hedgerow with trees associated with a bank	There is a hedgerow comprising hazel trees, associated with a bank, along the southern site boundary adjacent to Horton Road.	The hedgerow consists primarily of haze with plum and goat willow, all native woody species. The hedgerow is made from a mixture of young and mature trees, it is considered to be of local ecological importance.	
Habitats present within and adjacent to the site prior to the clearance.	From review of aerial imagery (shown to the right), it is assumed that a small section of young broadleaved woodland and scattered trees adjacent to London Road, neutral grassland, ruderal/ephemeral vegetation and areas of mixed scrub were present prior to the estate management. These maintenance / clearance works were only undertaken within the red and green line boundaries. It is understood that some works have also been undertaken separately by the neighbouring owner, which has resulted in some adjacent offsite habit also being removed.	Woodland and scrub can provide valuable habitat for birds, insects, and mammals. Woodlands, neutral grassland and scrub habitats play an important role in local biodiversity and ecological connectivity. This was young woodland/scrub that had established itself on top of an existing area of hard standing that forms part of the motorcycle training area, but as the site maintenance / clearance works were undertaken prior to surveys, it has been precautionarily assessed and considered of up to local ecological importance.	

2.5. As explained in the limitations section above, the habitats of the site were subject to estate management after the nesting bird season in 2024 and prior to ecology surveys being undertaken in Q1 2025. As such, aerial and street view imagery (shown below in **Table 2.3**) has been used to determine what habitats were previously present within the site, in order to inform the BNG assessment. Further detail and descriptions are provided in **Section 4** of this report. Please note offsite trees to the west of the site adjacent to the garage also thought to be woodland have also been removed. It is understood that these works were undertaken separately by the neighbouring owner. Their land is not affiliated with this application.



Table 2.3: Aerial imagery from June 2023 to June 2025

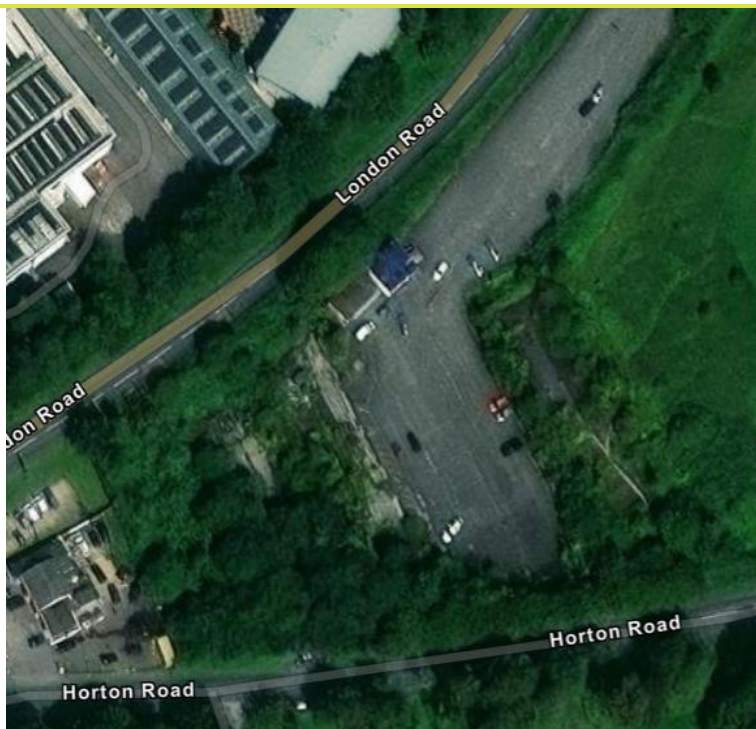
Photograph	Date
	Google street view imagery June 2023 – view looking south west along London road towards the site
	Google street view imagery June 2025 – view looking south west along London road towards the site
	Google street view imagery June 2023 – view looking north east towards offsite adjacent habitat that lies within the neighbouring owners land to the east of the garage.





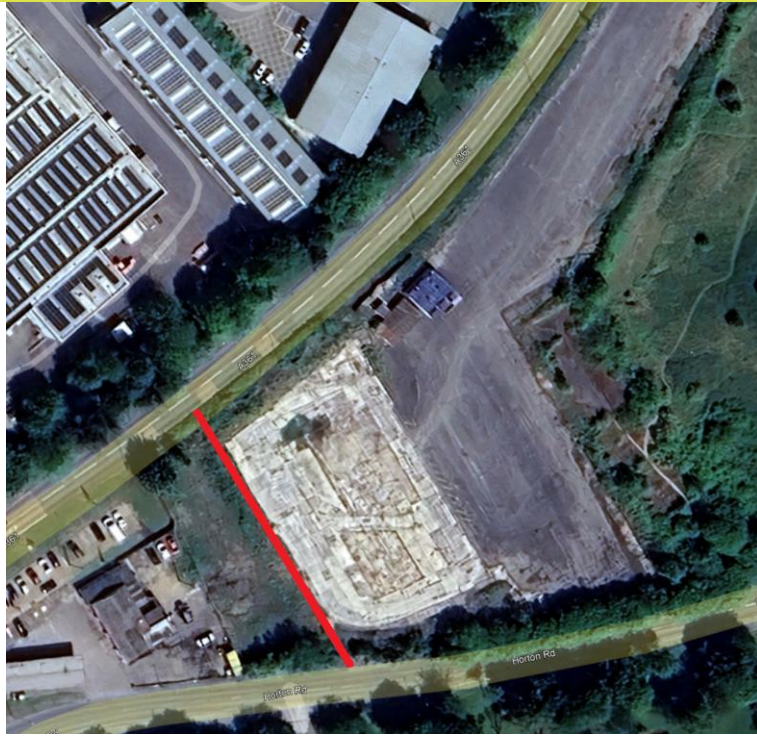
Google street view imagery June 2025
– View looking north east towards offsite adjacent habitat.

It is understood that these works were undertaken separately by the neighbouring owner. Their land is not affiliated with this application.



Google Satellite imagery image September 2023





Google Satellite
imagery June 2025.

Western edge of
the subject
application
boundary
approximately
shown by the red
line.



Protected and Notable Species

- 2.6. The below section sets out the potential for protected species on site. Species which are considered likely absent from the site based on professional judgement, following consideration of the habitats within the site, signs of species presence at the time of survey and data search records, are not discussed.

Amphibians

- 2.7. Data search returned records of common frog *Rana temporaria*, common toad *Bufo bufo* and great crested newt (GCN) *Triturus cristatus* within 2 km of the site. The nearest of these was a record of common frog 0.54 km south of the site. No European Protected Species (EPS) licences were returned for GCN within 2 km of the site.
- 2.8. The data search found multiple waterbodies within 500 m of the site, the closest of which is 260 metres, generally considered to be outside the typical maximum migratory range¹⁰ of the majority of GCN from a breeding pond. Suitable habitat within the site is restricted to small areas of ephemeral vegetation, which is considered to be sub-optimal for GCN. Given this, the lack of aquatic habitat within the site and surrounding area, and the presence of partial dispersal barriers such as roads between the site and suitable breeding habitat (an off-site pond to the south east), the site is considered unlikely to support GCN. As such, GCN are considered likely absent from the site and are not discussed further within the report.
- 2.9. Other more mobile amphibian species such as common toad have not been recorded on site during reptile surveys. Common toads are a priority species under The Natural Environment and Rural Communities (NERC) Act 2006¹¹. It is considered any population utilising terrestrial habitats on site, such as the line of hazel trees, will also be using further habitats beyond the site boundary and not reliant site alone. However similar dispersal barriers to that above would also take effect and reduce the possibility of presence.
- 2.10. As such any population of amphibians such as common toad on site would be of **negligible ecological importance**.

Badgers

- 2.11. The data search returned 116 records of Eurasian badger *Meles meles* within 2 km of the site boundary, the closest of which was approximately 0.09 km south of the site in 2016.
- 2.12. No setts were found on site and no evidence of badgers were identified during the UKHab survey. However, the ephemeral vegetation and line of hazel trees provide some foraging suitability. Due to the dispersal barriers around the site and the industrial park to the north and the residential area to the south, it is unlikely that they would be dependent on the site alone. As such should there be population of badgers that do use the site, it would be considered to be of **negligible ecological importance**.

¹⁰ Cresswell, W. & Whitworth, R., 2004. *An assessment of the efficiency of capture techniques and the value of different habitats for the great crested newt Triturus cristatus*: English Nature Research Report 576. Peterborough: English Nature.

¹¹ Section 40 of the NERC Act puts a duty on local authorities to have regard for the conservation of species and habitats listed at Section 41, including when considering planning applications.



Bats

2.13. The data search returned 143 records of bat species with 2 km of the site boundary. The species identified are :

- Barbastelle *Barbastella barbastellus*
- Brandt's Bat *brandtii*
- Brown Long-eared Bat *Plecotus auritus*
- Common Pipistrelle *Pipistrellus pipistrellus*
- Daubenton's Bat *Myotis daubentonii*
- Greater Horseshoe Bat *Rhinolophus ferrumequinum*
- Lesser Horseshoe Bat *Rhinolophus hipposideros*
- Serotine *Eptesicus serotinus*
- Soprano Pipistrelle *Pipistrellus pygmaeus*
- Natterer's Bat *Myotis nattereri*
- Noctule *Nyctalus noctula*
- Whiskered Bat *Myotis mystacinus*

Bat Activity

2.14. The site lies within an urban context, with light pollution adjacent to site on the north from an industrial estate and south from a residential area, and limited habitats for commuting and foraging bats in the wider landscape. It is assumed that light tolerant species, such as common and soprano pipistrelle, could forage within and adjacent to the site. The limited habitats on site, the line of hazel trees, don't provide significant commuting and foraging opportunities for bats due to their small size and low diversity. The habitat that was previously present on site could have presented opportunities for foraging bats, however, the urban context and surrounding roads that form both the site's northern and southern boundaries and general urban environment will have likely limited this to more light tolerant and common species.

2.15. Due to the small size of the site, limited habitats and its location between the A361 and Horton Rd which both have street lighting, it's unlikely that light sensitive species, such as horseshoe bats, would use or rely on the site. Overall, the assemblage of bats expected to utilise the site for foraging and commuting is currently considered to be of **negligible ecological importance**.



Bat Roosts

Preliminary Roost Assessment

- 2.16. A Preliminary Roost Assessment (PRA) was conducted alongside the UKHab survey. This assessment was carried out on the buildings and trees on and directly adjacent to the site, which may be impacted by the development. See **Appendix 4** for methodology and **Table 2.3** below for results.



Table 2.4: PBRA Results

Structure/tree and Suitability	Potential Roost Features (PRF)	Photograph
Building B1 – Shed like structure on breeze block platform	PRF1 – A small section of lifted roofing on the north side, fascia boarding creating a small cavity around roofing of structure. The features present are considered to be of low potential for a bat roost, with suitability to support a low number of crevice-dwelling bats. The interior of building was unable to be accessed to perform an internal assessment.	
	PRF2 – Lifted corrugated roofing sheets, creating small opportunities in the roofing structure to be accessed. Approx. 2.5 meters high. This feature is considered to be of low potential for a bat roost, with suitability to support a low number of crevice-dwelling bats. The interior of building was unable to be accessed to perform an internal assessment.	
Building B2 – Trio of pebble dash garages	PRF3 – Gaps in garage doors providing access to the internal space within. This feature is considered to be of low potential for a bat roost, with suitability to support a low number of crevice-dwelling bats. The interior of building was unable to be accessed to perform an internal assessment.	



Bat Emergence Surveys

- 2.17. Buildings B1 and B2 were subject to a single bat emergence survey on 20th May 2025. This included all the features that were identified and show in **Table 2.4** above. No emergences were observed and no bat roosts were identified within the site. A very low level of activity was recorded during the survey, with an estimated five passes of common pipistrelle only. The methodology and metadata are detailed in **Table A3.3** in **Appendix 4**.
- 2.18. Following the completion of the emergence survey it is considered that roosting bats are likely absent from the site. While individual, opportunistic bats may occasionally use the site for roosting purposes, the buildings on site do not provide opportunities for significant roosts (i.e. maternity or hibernation). The local assemblage of bats is unlikely to be reliant upon the site alone for its roosting features. It is therefore considered any assemblage of bats which may roost on the site are considered to be of **negligible ecological importance**.

Birds

- 2.19. The data search returned 24 records of Birds of Conservation Concern (BoCC) red-listed species within 2 km of the site. No records were returned within the site boundary. Of these, some species of relevance to the site include, herring gull *Larus argentatus*, house sparrow *Passer domesticus* and starling *Sturnus vulgaris*.
- 2.20. The data search also returned 37 records of BoCC amber-listed species within 2 km of the site, including records of dunnoek *Prunella modularis*, song thrush *Turdus philomelos* and sparrowhawk *Accipiter nisus*.
- 2.21. The line of hazel trees, offers habitat suitable to support common and widespread nesting birds. This would have been likely increased with the presence of the small area of broadleaved woodland that was removed as part of the 2024 estate management, as this would've provided a greater habitat area for foraging and nesting opportunities.
- 2.22. It is considered the assemblage of birds that may use the site, given its urban surroundings, for foraging and breeding is of **negligible ecological importance**, nevertheless consideration for nesting birds to avoid a breach of legislation is discussed in **Section 3** of this report.

Reptiles

- 2.23. The data search found 33 records of reptile recordings within 2km of the site boundary. The majority (22) and most recent (2018) of these recordings are for Grass Snake *Natrix helvetica* that was approximately 1.75 km east of the site.
- 2.24. Habitat on site such as the ephemeral vegetation, and the immediate area around the hazel tress could provide some suitable habitat for a low number of common reptiles.
- 2.25. Due to the presence of some suitable habitat on site and the historical habitats present prior to the 2024 estate management, reptile surveys were conducted between June and July 2025 in suitable conditions. No reptiles were found on site during the surveys and thus reptiles are considered to be likely absent from the site. The dates of surveys and the metadata are detailed in **Table A5.1** in **Appendix 5**.



Section 3: Ecological Impacts, Compensation, Mitigation, and Enhancement

Proposed Development

- 3.1. The Hybrid application has detailed proposals for the erection of an Aldi supermarket with associated car parking and soft landscaping shown in **Appendix 1** and the outline proposals for a drive-thru unit, EV charging hub and associated parking shown as part of the Masterplan in **Appendix 2**. The potential impacts at this site as a result of the proposed development are set out below, with reference to relevant legislation and planning policy.

Design Evolution

- 3.2. The design of the development has been iterative, and in accordance with policy and best practice guidance, following the 'mitigation hierarchy'. As such, and in so far as we could given the 2024 estate management, the development has been designed to avoid and retain the most important ecological features to ensure they can be managed in the long-term to enhance their importance for biodiversity. Where this has not been possible, new habitats have been proposed to compensate for habitat losses with the aim of maximising the overall ecological value of the habitats proposed on site.

Designated Sites

Statutory Sites

- 3.3. Given the nature of the site proposals and the distances involved between the site and Pewsey Down (SAC), no adverse direct or indirect effects are anticipated, and no specific mitigation is required. With the proximity to River Avon (SAC) catchment area a nutrient neutrality calculation could be required. However, information returned from the Pre-application service with Wiltshire Council - ENQ/2025/01219 stated: *'Since the proposal that is subject of this enquiry will not increase the number of overnight accommodations in the catchment, there is no mechanism for adverse effect. This proposal would likely be screened out of Appropriate Assessment within the planning process'*. Therefore, no calculations or further commentary on mitigation for nutrient neutrality are anticipated to be required.
- 3.4. No impacts to Roundway Downs and Covert SSSI are anticipated as part of the operational phase of the development, given there is significant distance between the two locations and a large industrial estate situated between. During the construction phase, there could be potential impacts via chemical/fuel run-off, noise/visual/vibration impacts, dust, etc.
- 3.5. Standard best practice pollution prevention¹² is expected to be incorporated into a Construction Environmental Management Plan (CEMP). These potential impact pathways will therefore be controlled, and impacts to Roundway Downs and Covert SSSI avoided.

¹² CIRIA (2015) *Construction Work Sector Guidance for Designers*. Fourth edition. (C755D).



Non-statutory Sites

- 3.6. Lay Wood Local Wildlife Site and The Avon and Kennet Canal lie 0.4 km and 0.54 km south of the site. Impacts during the operational phase are not anticipated due to the nature of the proposals. Impacts during construction activities could potentially occur to these sites via dust deposition and run-off.
- 3.7. These potential impacts can be controlled through best practice pollution prevention measures, which can be implemented in a CEMP, despite the sites being in close proximity there is a residential area situated between them which will reduce the impact pathway.
- 3.8. In summary, the production and implementation of a CEMP, to include standard best practice pollution prevention, is expected to be conditioned and therefore prevent impacts to the designated sites above.

Habitats and Flora

- 3.9. The habitats onsite will be lost to the proposals comprising the southern hedgerow of local ecological importance and the buildings, hardstanding and sealed surface with ephemeral vegetation all of negligible ecological importance.
- 3.10. The habitats present on site prior to the 2024 estate management, considered to be a small area of woodland, were of local ecological importance. The planting of native species trees as well as hedgerows with trees through the proposed landscaping scheme (see **Appendix 1**) provides some tree resource for the site.
- 3.11. Overall, the native planting of trees, hedgerows, and grassland is limited by the available space and will not be sufficient to improve the site's overall for biodiversity and as such, off-site compensation will be required to compensate for the loss of baseline habitats. Retrospective compensation for habitat loss will also be undertaken as part of the BNG assessment, and through delivery of the BNG plan assessing the habitats as they were pre the 2024 estate management. This will be in line with the guidelines of how to deal with degradation of site habitats¹³ prior to surveys that can evidence an accurate BNG assessment, as detailed in **Section 4**.

Protected and Notable Species

Bats

- 3.12. Building B1 and B2 were assessed as having low suitability to support roosting bats respectively. Both of these are being demolished as part of proposals. The bat emergence survey undertaken evidenced that bats were not present within either building. This, coupled with the low suitability that the buildings present to bats, mean the impacts of the buildings being demolished is of negligible ecological importance.
- 3.13. Indirect impacts associated with dust and noise during the construction phase will be minimised by the implementation of a CEMP. No lighting during construction is proposed. It

¹³ [Biodiversity net gain - GOV.UK](https://www.gov.uk/government/publications/biodiversity-net-gain)



is anticipated that lighting levels post-construction will not be greater than current levels. However, any outside lighting should avoid spilling onto retained habitats include retained and newly planted trees.

- 3.14. To provide the site some roosting resource for light tolerant bats, two bat boxes are recommended to be incorporated within scheme by either using integrated bat boxes within the building or externally erected bat boxes on retained trees expected to be controlled by appropriately worded planning conditions through an enhancement plan.
- 3.15. New native species landscape planting including native trees, shrubs and hedgerows, for foraging and commuting bats that may use the site post-development have been provided though this is recognised as limited given the limited vegetation and requirements of lighting post development.

Birds

- 3.16. All birds, their nests and eggs, are protected by law and as such it is an offence to intentionally kill, injure, or take any wild bird; intentionally take, damage, or destroy the nest of any wild bird while it is in use or being built; and intentionally take or destroy the egg of any wild bird.
- 3.17. To avoid triggering the legislation protecting nesting birds, clearance of suitable habitat (the buildings and trees) should be timed outside the nesting bird season (generally taken as March to September inclusive, though this is not defined in law and birds may nest outside of this time). If any clearance works to nesting habitats are required during the nesting season, then pre-removal checks for nesting birds must be carried out by a suitably experienced Ecological Clerk of Works (ECoW), no more than 48 hours prior to the works commencing. If any nesting birds are found to be present, an appropriate buffer zone will be implemented, within which works are excluded for the duration of the breeding attempt. Any active nests will need to be left in situ until a suitably experienced ecologist confirms that the chicks have fledged and the nest is no longer active.
- 3.18. Habitat creation within the soft landscaping such as native hedgerow and tree planting is expected to provide nesting opportunities on site. Additionally, two bird boxes are recommended to be incorporated within scheme, targeting species of conservation concern known to be present locally. Details of site enhancements would expect to be included in an enhancement plan, controlled within a suitably worded planning condition.



Section 4: Biodiversity Net Gain

National and Local Legislation and Policy

- 4.1. As of the 12th February 2024 it is mandatory for development (with a small number of exceptions) to achieve at least a 10% gain in biodiversity units under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).
- 4.2. Whilst the Wiltshire Council Core Strategy Plan has not yet been updated to specify the need for Biodiversity Net Gain (BNG) assessments, the Wiltshire Local Plan Review Biodiversity Net Gain Topic Paper outlines the commitment to updating these documents and necessitating net gain.
- 4.3. Based on the above, the target BNG score for the Proposed Development is +10%. Full details of relevant legislation and planning policies are detailed in **Appendix 3** below.

Application of Guidance

- 4.4. The proposals for the site have been developed with reference to the Biodiversity Gain Hierarchy and ecological Mitigation Hierarchy which are central to the BNG process as far as possible, given the habitat that was removed as part of the 2024 estate management.
- 4.5. The CIRIA BNG good practice principles for development (which include the mitigation hierarchy, principle one) were also applied at all stages of the assessment.
- 4.6. The BNG has been calculated using the habitats present on site, prior to the 2024 estate management, as the baseline. This has partially been based on the use of aerial imagery (see below).

Accounting for Degraded Sites

- 4.7. As outlined above, the site was subject to estate management in 2024, prior to the completion of the baseline assessment.
- 4.8. In accordance and the Planning Practice Guidance: Biodiversity Net Gain¹⁴ (Paragraph 036 Reference ID: 74-036-20240214), the *"pre-development biodiversity value of the onsite habitat must be taken to be the highest biodiversity value of the habitat which is reasonably supported by any available evidence relating to it"*. As detailed in the Statutory Biodiversity Metric User Guide the classification of habitats should therefore be informed by data records, imagery and historic field surveys and with a precautionary approach used to assign condition scores with a higher condition score used in the absence of contrary evidence.

¹⁴ Department for Levelling Up, Housing and Communities (DLUHC), *Planning Practice Guidance: Biodiversity Net Gain*, Paragraph 036, Reference ID: 74-036-20240214. Available at: <https://www.gov.uk/guidance/biodiversity-net-gain> [Accessed 27 May 2025].



- 4.9. The assessment of the site's pre-2024 estate management baseline has therefore been assessed most recently in November 2025 based on a review of contemporary survey data, aerial imagery and Google street view images.

Baseline Assessment

- 4.10. The habitats set out in **Table 4.1** below were present within the red line (full application) and blue line (outline application) boundaries of the site are shown on Habitat Features Plan **17700/P02a**, as well as the Habitat Features Plan – Pre 2024 Estate Management **17702/P03a** the latter of which informs the BNG baseline.
- 4.11. A summary of each habitat is provided below, along with the habitat condition and category it is assigned within the biodiversity net gain metric. The rationale for condition assessments is detailed within the metric **17700_BNG_Statutory Biodiversity Metric Baseline Condition Assessment_02122025** spreadsheet.

Full Application Area (Redline boundary)

Developed Land; Sealed Surface (Urban – Hardstanding)

- 4.12. The majority of the site comprised concrete hardstanding along with buildings. This habitat is classed as developed land; sealed surface that exhibits no biodiversity value within the metric. In accordance with the BNG technical supplement no condition assessment is required.

Ruderal Ephemeral (Sparsely vegetated land)

- 4.13. Based on aerial imagery, areas of ruderal/ephemeral vegetation are assumed to be present within the northwest of the site. These areas of vegetation are present in association with a concrete hardstanding substrate and as such would not be anticipated to comprise a more established or complex habitat.
- 4.14. In the absence of contrary information this habitat is precautionarily assigned 'good' condition, passing all condition criteria.

Other woodland; broadleaved (Woodland)

- 4.15. The southwestern part of the site was assessed as comprising other woodland; broadleaved. This assessment is based on aerial imagery which shows a canopy of vegetation and which, based on the street view imagery, has the potential to be greater than 5m, and would therefore exceed the definition of dense scrub as per the UKhab.
- 4.16. Based on the age of the woodland, which is young aged and was not present in aerial photos from c. 2006 and that it was present in association with a concrete hardstanding substrate, overall this habitat is assessed as being of moderate condition.

Mixed scrub

- 4.17. An area of mixed scrub habitat is assumed to be present within the site which would have established in the areas of former hardstanding.



- 4.18. In the absence of contrary information this habitat is precautionary assigned 'moderate' condition passing all condition criteria, with the exception of criteria B as mature or ancient or veteran trees would not be anticipated to be present based on the age of vegetation.

Bramble Scrub (Heathland and shrub)

- 4.19. Based on the status of adjacent habitats and street view images, the scrub adjacent to the road is assessed as bramble scrub. In accordance with the UKHabs¹, this habitat is automatically assigned a 'condition assessment N/A' and as such no condition assessment is required.

Other Neutral Grassland (Grassland – Other Neutral grassland)

- 4.20. A strip of grassland vegetation is present along the north boundary of the site adjacent to the offsite London road verge. This habitat is shown on aerial and street view imagery as comprising grassland and as such on a precautionary basis, given that this habitat is small in size and subject to management on occasion, this habitat is assessed as other neutral grassland.
- 4.21. In terms of Condition, on a precautionary basis this habitat is assumed to pass key criteria for higher value condition, namely A and F, however as this grassland is shown on street view imagery as being encroached by extensive common nettle and owing to occasional management is dominated by a single sward height, overall this habitat is assessed as being of moderate condition.

Modified Grassland (Grassland – Modified Grassland)

- 4.22. A strip of amenity grassland adjacent to the northern side of the A361 on its approach to Waller road lies within the site. A small section of the grassland is within the site boundary.
- 4.23. On a precautionary basis this habitat is assumed to be of good condition.

Rural Trees

- 4.24. Four individual trees are present along the roadside and which were removed as part of the 2024 estate management. Based on street view imagery these trees are all assessed as being medium in size and in the absence of contrary information this habitat is precautionary assigned 'good' condition passing all condition criteria.

Native hedgerow with trees - associated with bank or ditch

- 4.25. A hedgerow comprising hazel trees, associated with a bank, is present along the southern site boundary and has not been removed as part of the 2024 estate management. As such, this habitat has been subject to a full assessment and is determined to be of moderate condition.

Outline Area (Green line boundary)

Developed Land; Sealed Surface (Urban – Hardstanding)



- 4.26. The majority of the outline area of the site comprises concrete hardstanding. This habitat is classed as developed land; sealed surface that exhibits no biodiversity value within the metric. In accordance with the BNG technical supplement no condition assessment is required.

Rural Trees

- 4.27. Three individual trees were present along the roadside and which have previously been cleared. Based on street view imagery these trees are all assessed as being medium in size and in the absence of contrary information are precautionary assigned 'good' condition passing all condition criteria.

Other Neutral Grassland (Grassland – Other Neutral grassland)

- 4.28. A strip of grassland vegetation is present along the northern boundary of the site adjacent to the offsite London road verge. This habitat is shown on aerial and street view imagery as comprising grassland and as such on a precautionary basis, given that this habitat is small in size and subject to management on occasion, this habitat is assessed as other neutral grassland.
- 4.29. In terms of Condition, on a precautionary basis this habitat is assumed to pass key criteria for higher value condition, namely A and F, however as this grassland is shown on street view imagery as being encroached by extensive common nettle and owing to occasional management is dominated by a single sward height, overall this habitat is assessed as being of moderate condition.



Table 4.1. Baseline Habitats and Areas for the Application

Broad Habitat	Habitat Type	Area (hectares)	Distinctiveness	Condition	Area retained (hectares)	Area enhanced (hectares)	Area lost (hectares)
Full Application Area							
Urban	Developed land; sealed surface	0.612	Very low	N/A - Other	0	0	0.612
Sparsely vegetated land	Ruderal/ephemeral	0.0329	Low	Good	0	0	0.0329
Woodland and forest	Other woodland; broadleaved	0.171	Medium	Moderate	0	0	0.171
Heathland and shrub	Mixed scrub	0.0836	Medium	Moderate	0	0	0.0836
Heathland and shrub	Bramble Scrub	0.021	Medium	N/A	0	0	0.021
Grassland	Other neutral grassland	0.0796	Medium	Moderate	0	0	0.0796
Grassland	Modified grassland	0.025	Low	Good	0	0	0.025
Individual trees	Rural tree (medium size)	0.0651	Medium	Good	0	0	0.0651
Outline application area							
Urban	Developed land; sealed surface	0.356	Very low	N/A - Other	0	0	0.356
Grassland	Other neutral grassland	0.0208	Medium	Moderate	0	0	0.0208
Individual trees	Rural tree (medium size)	0.0489	Medium	Good	0	0	0.0489

Table 4.2. Baseline Hedgerows and Lengths

Hedge number	Hedgerow type	Length (km)	Distinctiveness	Condition	Length retained (km)	Length enhanced (km)	Length lost (km)
H1	Native hedgerow with trees – associated with bank or ditch	0.081	High	Moderate	0	0	0.081



Proposed Habitats

- 4.30. The soft landscape proposals, as shown in **Appendix 1**, have been used to calculate the proposed habitat areas of the detailed application area to be submitted for the Aldi proposals. A master plan with high level assumptions of what may be possible for the Reserved Matters shown in **Appendix 2** has been used to inform the proposed habitat for the Outline proposals. The rationale for target condition assessments is detailed within the metric **17700_BNG_Statutory Biodiversity Metric_20022026**.
- 4.31. For the outline element of the application, the post development habitats have been determined based on the masterplan proposals. Given the outline nature of these proposals it is possible that significant changes may occur at the time of the Reserved Matter submission and as such additional mitigation for BNG may be incorporated.

Table 4.3. Created Habitats

Detailed Application Area						
Broad Habitat	Proposed habitat	Area (hectares)	Created/enhanced	Baseline condition	Distinctiveness	Target condition
Urban	Developed land; sealed surface	0.971	Created	N/A	Very low	N/A - Other
Urban	Artificial unvegetated, unsealed surface	0.011	Created	N/A	Very low	N/A - Other
Urban	Introduced shrub	0.0075	Created	N/A	Low	N/A - Other
Heathland and shrub	Mixed scrub	0.008	Created	N/A	Medium	Poor
Grassland	Other Neutral Grassland	0.0427	Created	N/A	Medium	Moderate
Grassland	Modified grassland	0.0517	Created	N/A	Low	Poor
Urban	Urban trees	0.0326	Created	N/A	Medium	Moderate
Outline application area						



Urban	Developed land; sealed surface	0.312	Created	N/A	Very low	N/A - Other
A net loss of - 4.15 habitat units, - 89.35%						

Table 4.4. Created Hedgerows – Detailed Application Area

Habitat type	Length (km)	Created/enhanced	Distinctiveness	Target condition
Species rich native hedgerow with trees	0.23	Created	High	Poor
A net gain of 0.36 hedgerow units, 37.01% however, trading rules not satisfied for the loss of baseline hedgerow and an additional 0.97 units would be required				



Results Summary

- 4.32. As described within metric **17700_BNG_Statutory Biodiversity Metric_02122025**, and summarised below in **Figure 4.1**, based on the habitats present on site that will be lost and those to be created, the development would result in a net loss of 4.15 habitat units and a net gain of 0.36 hedgerow units. This equates to a percentage loss of 89.35% in habitat units and gain of 37.01 % in hedgerow units.

FINAL RESULTS				
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)		Habitat units	-4.15	
		Hedgerow units	0.36	
		Watercourse units	0.00	
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)		Habitat units	-89.35%	
		Hedgerow units	37.01%	
		Watercourse units	0.00%	
Trading rules satisfied?		No - Check Trading Summaries ▲		
Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Habitat units	10.00%	4.64	5.10	4.61
Hedgerow units	10.00%	0.97	1.07	0.00
Watercourse units	10.00%	0.00	0.00	0.00

Figure 4.1: Biodiversity Net Gain Assessment Results Summary, taken from The Statutory Biodiversity Metric.

- 4.33. The assessment however fails to satisfy the BNG trading rules for both habitats and hedgerows. For habitats there is net loss of both medium and low distinctiveness habitats. For hedgerows, whilst the site achieves an overall net gain, the loss of high distinctiveness native hedgerow with trees associated with bank or ditch is not replaced on a like for like basis. As such, whilst achieving net gains in hedgerows aligns with the National Planning Policy Framework (NPPF) (December 2024), in addition to Core Policy 50 of the Wiltshire Core Strategy (see **Appendix 3**) additional replacement habitat is required to meet the BNG trading rules for both habitats and hedgerows
- 4.34. In order to achieve a net gain of habitat units (+ 10%) and satisfy the trading rules, the purchase of off-site units (4.61 habitat units and 0.97 hedgerow units) would be required to achieve net gains and satisfy the BNG trading rules. For habitats the provision of replacement units would need to either on a 'like for like' or 'like for better' basis. This purchase of units would be secured through a Section 106 agreement, or other appropriate planning mechanism. This is currently expected to be through the Environment Bank and their Chippenham Habitat Bank. The full BNG assessment for the site's development, including off-site habitat provider details, is expected to be secured via a suitably worded condition. This would then expect to meet National and local planning policy including Core Policy 50.



Management

- 4.35. The results of The Statutory Biodiversity Metric are based on the habitats within the site being maintained at a certain condition, as prescribed by the condition assessment sheets published by Defra.
- 4.36. Details of habitat establishment and long-term management will be provided through the production of a Habitat Management and Maintenance Plan (HMMP). The HMMP would set out the prescriptions for the establishment and maintenance of the habitats on site for 30 years.



Section 5: Conclusions

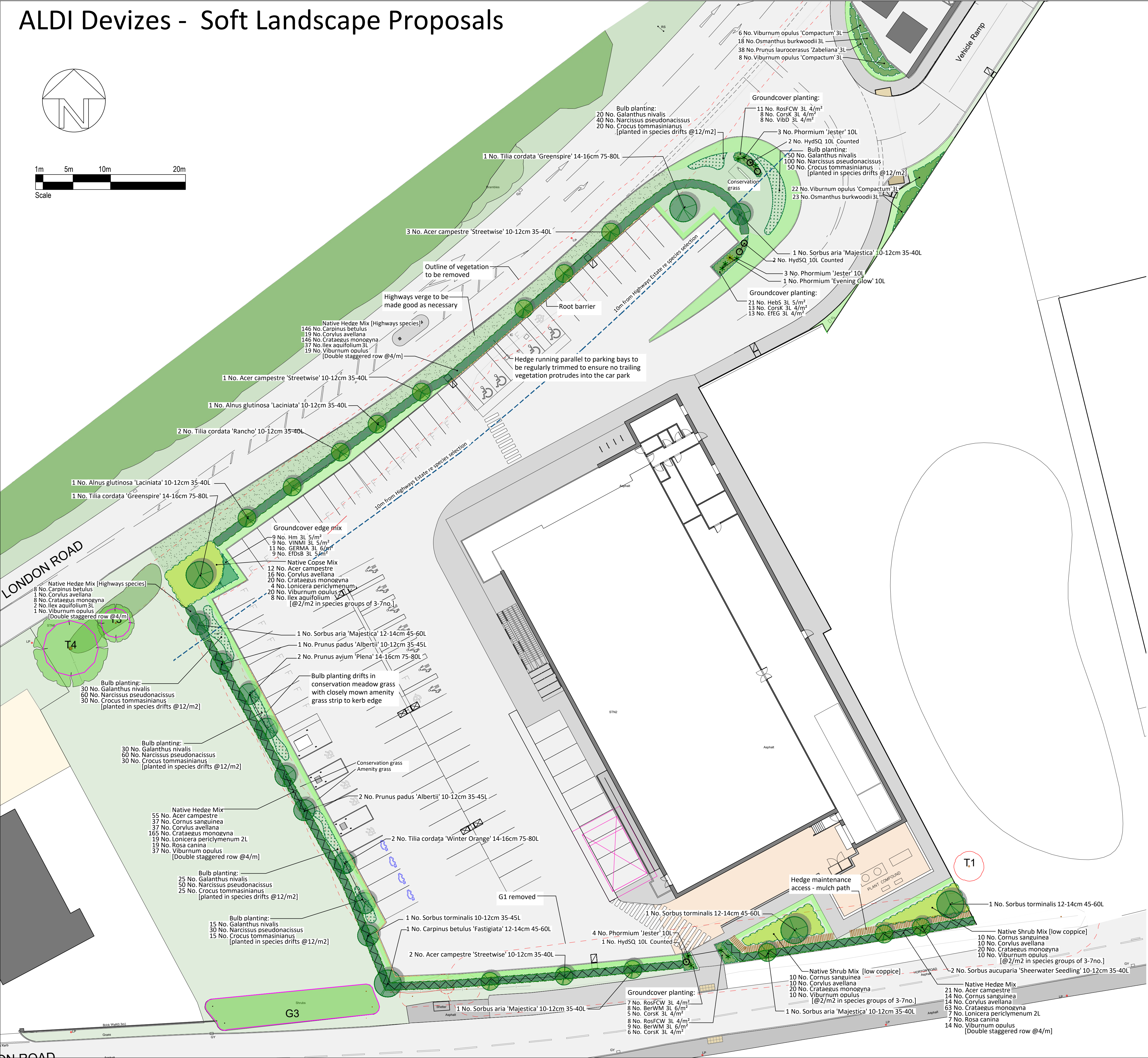
- 5.1. With the implementation of mitigation and enhancements described in **Section 3** and provided a net gain of 10% in habitat units is achieved (likely through the creation and maintenance of off-site habitat units), it is considered that the proposed development would be able to conform with relevant legislation, national planning policy and local planning policy as detailed in **Appendix 3**.
- 5.2. No impacts on statutory or non-statutory designated sites are considered likely as a result of the development.
- 5.3. In order to comply with national and local planning policy on achieving net gains, the purchase of 4.61 off-site habitat units and 0.97 hedgerow units (to meet trading rules) will be required and secured through a Section 106 agreement, or other appropriate planning mechanism. The full BNG assessment for the site's development, including off-site habitat provider details, and details of habitat establishment and long-term management and the specific breakdown for the full application part of the hybrid application – to be provided through the production of an HMMP – can be secured via a suitably worded condition.
- 5.4. It has been recommended that proposed mitigation and enhancement are secured through the production of a CEMP and HMMP, and a sensitive lighting strategy for bats. These can be secured through suitably worded planning conditions.



Appendix 1: Soft Landscape Proposals



ALDI Devizes - Soft Landscape Proposals



key

Existing Trees
Refer to Arboricultural Assessments for further details

Existing vegetation to be removed

Proposed Tree Planting

Proposed Native Cope Mix Planting
transplants planted @ 1-2/m² in species groups

Proposed Native Mix Hedge Planting
planted @ 4/Lm in double staggered row

Proposed Feature Specimen Shrub Planting
10L pots

Proposed Groundcover Planting
2L pots planted @ 4-7/m²
species from RHS 'Plants for Pollinators'

Proposed Groundcover Edge Mix Planting
2L pots planted @ 3-5/m²
species from RHS 'Plants for Pollinators'

Proposed Conservation Meadow Grass - hedgerow & shady margins and General Purpose Meadow Mix
Emorsgate Seeds EH1 Hedgerow Mixture sown / EM1 Meadow Mix, @ 4g/m² or equivalent turf

Proposed Closely Mown Amenity Grass - kerb margins
Emorsgate Seeds EL1 Flowering Lawn Mixture sown, @ 4g/m² or equivalent turf - kerb margins 600mm wide edge alongside parking kerbs Germinol A24 Wear & Tear mix

Proposed Bulbs and / or Wildflower Plugs

Root barrier - reroot 600 of similar approved

NOTES:
Refer to dwg 1636-03 for planting schedule and notes

CAMBIUM : Landscape architecture Arboricultural consultancy			
Project	Aldi, Drive-thru and EV Hub - London Road, Devizes		
Title	Soft Landscape Proposals		
Client	PRZM Real Estate & Aldi Ltd		
Date	February 2026	Drawn LR	Checked MW
Scale	1:250@A1	Status	Planning
Dwg No	DR-L-1636-02	Revision	P04
Cambium, 4 Clyde terrace, Bedminster Bristol BS3 3BL			

Appendix 2: Proposed Masterplan



- KEY**
- Area of outline application
Drive-Thru and EV charging hub
 - Existing trees
 - Concrete
 - Tarmac/ Asphalt
 - Soft landscaping
 - Retaining structure

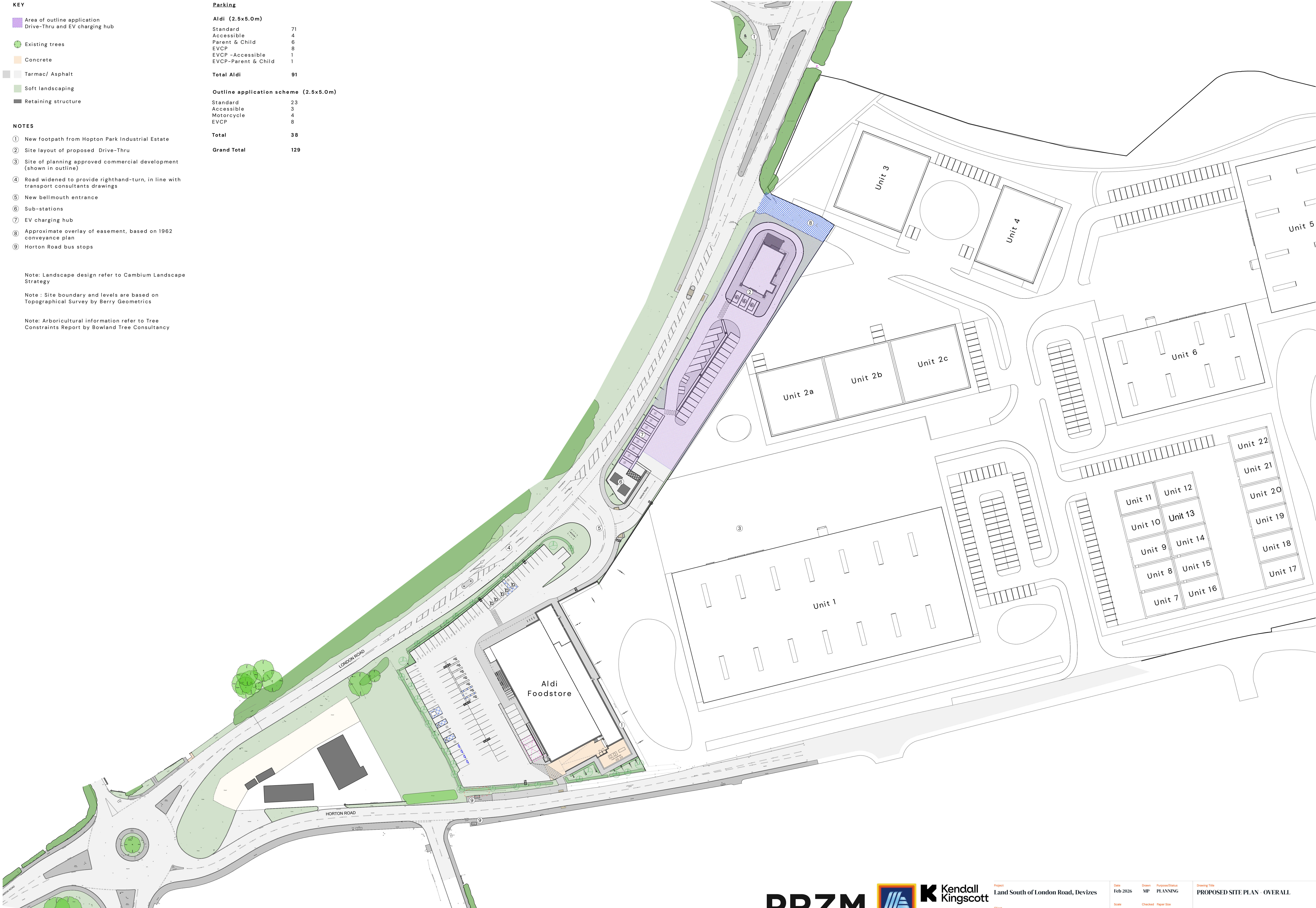
- NOTES**
- New footpath from Hopton Park Industrial Estate
 - Site layout of proposed Drive-Thru
 - Site of planning approved commercial development (shown in outline)
 - Road widened to provide righthand-turn, in line with transport consultants drawings
 - New bellmouth entrance
 - Sub-stations
 - EV charging hub
 - Approximate overlay of easement, based on 1962 conveyance plan
 - Horton Road bus stops

Note: Landscape design refer to Cambium Landscape Strategy

Note : Site boundary and levels are based on Topographical Survey by Berry Geometrics

Note: Arboricultural information refer to Tree Constraints Report by Bowland Tree Consultancy

Parking		
Aldi (2.5x5.0m)		
Standard	71	
Accessible	4	
Parent & Child	6	
EVCP	8	
EVCP -Accessible	1	
EVCP-Parent & Child	1	
Total Aldi	91	
Outline application scheme (2.5x5.0m)		
Standard	23	
Accessible	3	
Motorcycle	4	
EVCP	8	
Total	38	
Grand Total	129	



N
0 10 20 30 40 50 M
Scale 1:500 @A0

PRZM
— REAL ESTATE —



Kendall Kingscott
Glentworth Court, Lime Kiln Close
Stoke Gifford, Bristol BS34 8SR
+44 (0)117 931 2062
www.kendallkingscott.co.uk

Project
Land South of London Road, Devizes
Client
PRZM Real Estate & Aldi Ltd.

Date
Feb 2026
Scale
1:500
Filename
240646.vwx

Drawn
MP
Checked
MW
Purpose/Status
PLANNING
ISO A0

Drawing Title
PROPOSED SITE PLAN - OVERALL

Project Number/Drawing Number
240646-1301
Check all dimensions and levels on site

Revision
P12
© Copyright

Only to be used on the site for which designed. The electronic transmission of design information contained in this drawing is carried out entirely at the User's risk and Kendall Kingscott Ltd. will have no liability for any errors or inaccuracies arising therefrom. The production of amended or updated information from the said design information by the User is entirely the responsibility of the User and Kendall Kingscott Ltd. shall have no responsibility in respect thereof whatsoever.

Appendix 3: Legislation and Planning Policy

Legislation

- A3.1. Specific habitats and species receive legal protection in the UK under various pieces of legislation, in order of royal assent, including:
- The Wildlife and Countryside Act (1981) (as amended);
 - The Protection of Badgers Act (1992);
 - The Wild Mammals (Protection) Act (1996);
 - The Hedgerows Regulations (1997);
 - The Countryside and Rights of Way Act (2000);
 - The Natural Environment and Rural Communities (NERC) Act (2006);
 - The Conservation of Habitats Species Regulation (2017) (the 'Habitats Regulations');
 - The Environmental Act 2021; and
 - The Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024.

The Wildlife and Countryside Act (WCA) (1981) (as amended);

- A3.2. The WCA 1981 (as amended) is a piece of legislation protecting habitats and species. SSSIs, representing the best examples of our natural heritage, are notified under the WCA 1981 by reason of their flora, fauna, geology or other features.
- A3.3. Schedule 5 establishes a list of protected species in England and Wales which are protected under Section 9 subsections 4b, 4c and 5 which makes it an offence to:
- Disturb any protected species while it is occupying a structure or place which it uses for shelter or protection;
 - Obstruct access to any structure or place which any such animal uses for shelter or protection;
 - Sell, offer or expose for sale, or have in possession or transport for the purpose of sale (any live or dead wild Schedule 5 animal or any part or anything derived from such an animal); or
 - Publish or cause to be published any advertisement likely to be understood as conveying that he buys or sells, or intends to buy or sell, any of those things.
- A3.4. Schedule 6, Section 11 also states protected species cannot be killed or taken by certain methods, such as traps and nets, poisons, automatic weapons, electrical devices, smoke / gases etc.
- A3.5. This legislation covers protected species in all life stages, and they are all afforded the same protection.



- A3.6. All breeding birds, their nests, eggs and young are protected under the Act, which makes it illegal to knowingly destroy or disturb the nest site during nesting season. Schedules 1, 5 and 8 afford protection to individual birds, other animals and plants.

The Protection of Badgers Act (1992);

- A3.7. The Protection of Badgers Act 1992 consolidates the previous Badger Acts of 1973 and 1991. The legislation aims to protect the species from persecution, rather than being a response to an unfavourable conservation status. As well as protecting the animal itself, the 1992 Act also makes the intentional or reckless destruction, damage, or obstruction of a badger sett an offence.
- A3.8. A sett is defined as 'any structure or place which displays signs indicating current use by a badger'. In addition, the intentional elimination of sufficient foraging area to support a known social group of badgers may, in certain circumstances, be construed as an offence by constituting 'cruel ill treatment' of a badger. Badgers are not the subject of conservation action.
- A3.9. Due to the continued persecution of this species, all details relating to the location of badger setts must be kept out of the public domain and not submitted to any public portal as part of the application submission.

The Wild Mammals (Protection) Act (1996);

- A3.10. The Wild Mammals (Protection) Act 1996 protects wild mammals (those not classed as protected animal under the Animal Welfare Act 2006) from intentional harm, killing and forms of injury or torture. Provisions are also in place to allow for the killing of animals in certain exception circumstances such as mercy killing.

The Hedgerows Regulations (1997);

- A3.11. The Hedgerows Regulations 1997 protect and prohibit the removal of countryside hedgerows (or parts of them) without first notifying the local planning authority. An important hedgerow under the regulations is any hedgerow that meets one of the below criteria:
- 20 meters or more in length;
 - Less than 20 meters in length but meet another hedgerow at each end; and
 - On, or adjoining, land used for agriculture, forestry, breeding or keeping horses, ponies, or donkeys, common land, village greens, Sites of Special Scientific Interest, or Local Nature Reserves.
 - These regulations do not apply to domestic gardens.

The Countryside and Rights of Way Act (2000);

- A3.12. The Countryside and Rights of Way Act 2000 establishes further protections through amends the law introduced in the WCA 1981 (as amended) relating to the conservation of nature and protection of wildlife. It includes the following amendments:
- Amends Schedule 9 of the WCA 1981 (as amended) to include offences relating to laws protection Sites of Special Scientific Interest;



- Amends schedule 10 and 11 of WCA 1981 (as amended) to allow for the designation and notification of relevant government bodies for Ramsar sites under paragraph 1 of article 2 of the Ramsar convention; and
- Amends Section 51 of the WCA 1981 (as amended) to include additional powers to enter private land, including to assess the condition of the flora, fauna, or geological or physiographical features by reason of which land which has been notified under section 28(1) is of special interest.

The Natural Environment and Rural Communities (NERC) Act (2006);

- A3.13. The NERC Act, 2006 further increases protection of species and habitats originally set out in WCA 1981 (as amended).
- A3.14. Section 40 places a duty to conserve biodiversity on public authorities in England. It requires local authorities and government departments to have regard to the purposes of conserving biodiversity in a manner that is consistent with the exercise of their normal functions such as policy and decision-making. Conserving biodiversity may include enhancing, restoring or protecting a species population or a habitat
- A3.15. Section 41 requires the Secretary of State to publish and maintain a list of species and habitats regarding by Natural England to be of principal importance. These are known as Species of Principle Importance (SoPI) and Habitat of Principle Importance (HoPI). These were originally drawn from the Biodiversity Action Plan previously established by English Nature.
- A3.16. Section 41 also established the requirement and duty of local and regional planning authorities to take into account species and habitats set out in Section 41, when making policy and planning decisions, including determining planning conditions.
- A3.17. The NERC Act 2006 also makes changes to the original legislation set out in the WCA (as amended) 1981, these include;
- Clarifications relating to the protection of wild and captive bred birds;
 - Prohibits the use of certain pesticides; and
 - Provides further clarification on the sale of plants and animals and their parts.

The Conservation of Habitats Species Regulations (Habitats Regulations) (2017)

- A3.18. The Conservation of Habitats and Species Regulations 2017 (as amended) is the legal framework to protect the species and habitats covered within The European Council Directive on the Conservation of Natural Habitats and of Wild Flora and Fauna, 1992 (EEC Council Directive 92/43/EEC), often referred to as the 'Habitats Directive', enacted under UK law from the UK leaving the European Union. It provides for the protection of key habitats and species considered of international importance.
- A3.19. It is considered the primary piece of legislation protecting habitat and species, and subsequent protected sites on which they are designated, overriding the WCA 1981 (as amended).



A3.20. Schedule 2 of the Habitat Regulations 2017 further increases protection and established a list of protected animal species. It lists species considered as European Protected Species (EPS).

A3.21. Schedule 3 of the Habitat Regulations 2017 further increases protection and established a list of protected plant species.

A3.22. Regulation 41 (1) makes it an offence to:

- Deliberately take, injure or kill a protected species;
- Intentionally or recklessly disturb a protected species in its resting or breeding place or deliberately disturb a group of protected species;
- Damage or destroy a place used by protected species for breeding or resting place (even if are not occupied at the time);
- Possess or advertise / sell / exchange a protected species found in the wild in the EU (dead or alive) or any part of a protected species; and
- Intentionally or recklessly obstruct access the resting place of a protected species.

A3.23. Regulation sets out the licensing to allow for activities under Regulation 41 (1) to become lawful.

The Environmental Act 2021

A3.24. The Environmental Act 2021 make provision about targets, plans and policies for improving the natural environment.

A3.25. Part 6 and 7 of the Environmental Act 2021 includes provisions to strengthen and improve the duty on public bodies to conserve and enhance biodiversity, including mandating 10% a net gain biodiversity through the planning system.

A3.26. It also established the Office for Environment Protection (OEP) a regulatory statutory body (or watchdog) that provides independent oversight of the government's environmental progress.

The Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024.

A3.27. The Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024 allow for the exercise of powers established in the Town and Country Planning Act 1990 and of the Environment Act 2021. It is mandatory for nearly all development (with a small number of exceptions) to achieve at least a 10% gain in biodiversity units under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).

Planning Policy

National Planning Policy Framework (NPPF), December 2024

A3.28. The NPPF was published in December 2024 and sets out the Government's planning policies for England and how these should be applied. It replaces the previous NPPF originally published in March 2012 and previously updated in December 2023.

A3.29. Paragraph 11 states that:



"Plans and decisions should apply a presumption in favour of sustainable development."

A3.30. Section 11 of the NPPF, paragraph 125, sub-section a) states that planning policies and decisions should:

- a) *"encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains - such as developments that would enable new habitat creation or improve public access to the countryside;*
- b) *recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production"*

A3.31. Section 13 refers to development in the Green Belt and introduces 'Golden Rules' that, at paragraph 159, state how such development should *"support nature's recovery" and "where land has been identified as having particular potential for habitat creation or nature recovery within Local Nature Recovery Strategies, proposals should contribute towards these outcomes"*.

A3.32. Section 15 of the NPPF (paragraphs 187 to 195) considers the conservation and enhancement of the natural environment.

A3.33. Paragraph 187 states that planning and decisions should contribute to and enhance the natural and local environment by:

- a) *"protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
- b) *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services - including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
- c) *maintaining the character of the undeveloped coast, while improving public access to it where appropriate; and*
- d) *minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs"*

A3.34. Paragraph 188 states that plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

A3.35. Paragraph 192 states that in order to protect and enhance biodiversity and geodiversity, plans should:

- a) *"Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally*



designated sites of importance for biodiversity¹⁵; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation¹⁶; and

- b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.”*

A3.36. When determining planning applications, Paragraph 193 states that local planning authorities should apply the following principles:

- a) “if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*
- b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;*
- c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons¹⁷ and a suitable compensation strategy exists; and*
- d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.”*

A3.37. As stated in paragraph 194 the following should be given the same protection as habitats sites:

- a) “potential Special Protection Areas and possible Special Areas of Conservation;*
- b) listed or proposed Ramsar sites¹⁸; and*
- c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.”*

A3.38. Paragraph 195 states that

“The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other

¹⁵ Circular 06/2005 provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system.

¹⁶ Where areas that are part of the Nature Recovery Network are identified in plans, it may be appropriate to specify the types of development that may be suitable within them.

¹⁷ For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.

¹⁸ Potential Special Protection Areas, possible Special Areas of Conservation and proposed Ramsar sites are sites on which Government has initiated public consultation on the scientific case for designation as a Special Protection Area, candidate Special Area of Conservation or Ramsar site.



plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site”.

Local Planning Policy

A3.39. The adopted Local Plan for Wiltshire Council is the Wiltshire Core Strategy (WCS), adopted in 2015. This incorporates saved policies from former District Local Plans that are not replaced by the WCS.

Wiltshire Core Strategy¹⁹ (adopted January 2015)

A3.40. Policies relating to ecology and nature conservation are listed under Strategic Objective 5: Protecting and enhancing the natural, historic and built environment, specifically Core Policy 50 which is summarised below.

A3.41. Core Policy 50: Biodiversity and Geodiversity

Protection

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

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

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

Biodiversity enhancement

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

¹⁹ Wiltshire Core Strategy (2015) [Online] Available at: <https://www.wiltshire.gov.uk/media/372/Wiltshire-Core-Strategy-adopted-2015/pdf/Wcs.pdf?m=637099399373530000> [Accessed 20/10/2025]



Local sites

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

- i) cannot reasonably be avoided;*
- ii) are reduced as far as possible;*
- iii) are outweighed by other planning considerations in the public interest; and*
- 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.”

A3.42. Core Policy 52

Green infrastructure Development shall make provision for the retention and enhancement of Wiltshire’s green infrastructure network, and shall ensure that suitable links to the network are provided and maintained.

Where development is permitted developers will be required to:

- i. retain and enhance existing on site green infrastructure;*
- ii. make provision for accessible open spaces in accordance with the requirements of the adopted Wiltshire Open Space Standards;*
- iii. put measures in place to ensure appropriate long-term management of any green infrastructure directly related to the development*
- iv. provide appropriate contributions towards the delivery of the Wiltshire Green Infrastructure Strategy*
- v. identify and provide opportunities to enhance and improve linkages between the natural and historic landscapes of Wiltshire.*

If damage or loss of existing green infrastructure is unavoidable, the creation of new or replacement green infrastructure equal to or above its current value and quality, that maintains the integrity and functionality of the green infrastructure network, will be required.

Proposals for major development should be accompanied by an audit of the existing green infrastructure within and around the site and a statement demonstrating how this will be retained and enhanced through the development process.



Development will not adversely affect the integrity and value of the green infrastructure network, prejudice the delivery of the Wiltshire Green Infrastructure Strategy, or provide inadequate green infrastructure mitigation.

Green infrastructure projects and initiatives that contribute to the delivery of a high quality and highly valued multi-functional green infrastructure network in accordance with the Wiltshire Green Infrastructure Strategy will be supported. Contributions (financial or other) to support such projects and initiatives will be required where appropriate from developers.

Biodiversity Action Plan for Wiltshire²⁰

A3.43. The Biodiversity Action Plan (BAP) for Gloucestershire outlines action plans for the following habitats and species:

Habitats	Species
• Woodland • Wood-pasture, parkland and ancient trees • Ancient and/or species-rich hedgerows • Traditional orchards • Farmland habitats • Calcareous grassland • Unimproved neutral grassland • Rivers, streams and associated habitats • Standing open water • Lowland heathland • Built environment	• Barbastelle • Bechstein's bat • Greater horseshoe bat • Common pipistrelle • Soprano pipistrelle • Lesser horseshoe bat • Natterer's bat • Brown long-eared bat • Serotine • Brandt's bat • Daubenton's bat • Whiskered bat • Noctule • Nathusius' pipistrelle • Leisler's bat

²⁰ Wiltshire Biodiversity Action Plan (2008) [Online] Available at: <https://www.wiltshirewildlife.org/sites/default/files/2022-08/wiltshirebap2008%281%29.pdf> [Accessed: 02/11/2023]



Appendix 4: Methodology

Data Search

- A4.1. A desk-based study was conducted whereby records of designated sites and records of protected and priority species were purchased and interrogated for the site and the surrounding landscape. The aim of the data search is to collate existing ecological records for the site and adjacent areas. Obtaining existing records is an important part of the assessment process as it provides information on issues that may not be apparent during a single survey, which by its nature provides only a 'snapshot' of the ecology of a given site.
- A4.2. The following resources were consulted/contacted:
- Multi-Agency Geographic Information for the countryside (MAGIC) website²¹;
 - Wiltshire and Swindon Biological Records Centre (WSBRC)²²; (Data ordered on 21 August 2025 and received on 29 August 2025);
 - Devizes Town Council website²³;
 - Joint Nature Conservation Committee (JNCC) website²⁴;
 - Natural England (NE) designated sites website²⁵;
 - Ordnance Survey mapping; and
 - Google Maps, including aerial photography.
- A4.3. The following areas of search around the boundary of the site boundary were applied:
- 2 km for protected and priority species, national statutory designated and non-statutory sites; and
 - 10 km for international statutory sites.

²¹ <https://magic.defra.gov.uk/> [Accessed 02/09/2025]

²² <https://www.wsbr.org/> [Accessed 29/08/2025]

²³ <https://www.devizes-tc.gov.uk/> [Accessed 02/09/2025]

²⁴ <http://jncc.defra.gov.uk/ProtectedSites/> [Accessed 02/09/2025]

²⁵ <https://designatedsites.naturalengland.org.uk/> [Accessed 02/09/2025]



'Extended' Phase I Habitat Survey and UK Habitat (UKHabs) Survey

- A4.4. An 'extended' Phase 1 survey was carried out on 11th February 2025 by Vicky King-Cline BSc MSc, a suitably experienced ecologist and qualifying member of CIEEM. The methods used during the walkover survey broadly followed methods used in an 'extended' Phase I habitat survey²⁶ and entailed recording the main plant species and classifying and mapping habitat types with reference to the Habitat Definitions provided by the UK Habitat Classification Working Group²⁷.
- A4.5. Additionally, the habitats identified were evaluated for their potential to support legally protected and notable fauna species. Where access allowed, adjacent habitats were also considered in order to assess the site within the wider landscape and to provide information with which to assess possible impacts within the context of the site boundary.
- A4.6. All habitats were assessed utilising the relevant condition criteria for the relevant habitat type under the Statutory Biodiversity Metric, which included confirming 'pass' / 'fail' criteria taken from the UK Habitat/Phase 1 methodology where necessary.

Preliminary Roost Assessment

- A4.7. A PRA was undertaken on all buildings within the site boundary. The assessment was undertaken on 11th February 2025 by Vicky King-Cline, MSc, BSc. All surveys were daytime inspections and the conditions for all surveys were considered optimal. The location of the buildings at the site are shown on the **Habitat Features Plan 17700/P02**.
- A4.8. All buildings were inspected from the ground using binoculars, high powered torch, digital camera and endoscope for accessible features. In relation to buildings, such signs may include bat droppings, urine splashes, staining and features suitable for allowing bats access to roost (e.g. gaps behind soffits / hanging tiles / ridge tiles, lifted slates / flashing). The internal inspection of the buildings comprised a thorough search for evidence of roosting bats in accessible loft spaces (i.e. droppings, urine stains) and an assessment of the presence of potential roosting features internally.
- A4.9. The potential of the buildings to support roosting bats was assessed using the criteria shown in **Table A3.1** below.

²⁶ Joint Nature Conservation Committee (2010). Handbook for Phase 1 habitat survey - a technique for environmental audit. JNCC, Peterborough.

²⁷ Butcher, B., Carey, P., Edmons, R., Norton, L. and Treweek, J. (2020). UK Habitat Classification – Habitat Definitions V1.1
London Road, Devizes, Wiltshire
Ecological Impact Assessment
17700_R01a_23rd February 2026_VKC



Table A3.1: Building / Structure Assessment Criteria, adapted from Collins, 2023

Potential Suitability	Description of Roosting Habitats in Structures
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).
Negligible ^a	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions ^b and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site, but could be used by individual hibernating bats ^c).
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions ^b and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity and hibernation – the characterisation described in this table is made irrespective of species conservation status, which is established after presence is confirmed).
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 and potentially for longer periods of time due to their size, shelter, protection conditions ^b and surrounding habitat. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/stable hibernation site.
^a 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 actually would (due to another attribute). ^b For example, in terms of temperature, humidity, height above ground level, light levels or levels of disturbance. ^c Evidence from the Netherlands shows mass swarming events of common pipistrelle bats in the autumn followed by mass hibernation in a diverse range of building types in urban environments. Common pipistrelle swarming has been observed in the UK and winter hibernation of numbers of this species has been detected at Seaton Delaval Hall in Northumberland. This phenomenon requires some research in the UK, but ecologists should be aware of the potential for larger numbers of this species to be present during the autumn and winter in prominent buildings in the landscape, urban or otherwise.	

A4.10. The potential of the buildings within the site to support roosting bats has been categorised against the criteria described in **Table A2.1**. Results of the PRA are shown in **Section 2** of this report.

A4.11. Two buildings were assessed for bat roost potential during the survey. **Table A3.2** below summarises the results of these surveys.



Table A3.2: Building Bat Roosting Potential and Survey Results

Building	Description and Potential Roosting Features	Roosting Suitability and Survey Results	Hibernation Potential
B1	Single story wooden structure with flat paneled roof, one panel lifted on front of building and guttering has slipped down. Fascia boards running along all walls of building directly under roof creating roost features. No visible evidence of bats from external inspection of building and potential features.	Low suitability to support roosting bats due to the poor surroundings around the building. Survey found no evidence of bats using the building.	Considered to be of low potential due to the lack of linked habitat and no evidence of bat use within the building.
B2	Triple garage structure with damage to the lift up doors, creating possible entry point to internal space. Building also has corrugated roof with suitable sized gaps for bat roost potential. No evidence of bats upon external inspection of the building and potential features.	Low suitability to support roosting bats due to poor surroundings around the building. Survey found no evidence of bats using the building.	Considered to be of low potential due to the lack of linked habitat and no evidence of bat use within the building.

Bat Emergence Survey

- A4.12. One emergence survey was completed on buildings B1 and B2, which were assessed as having 'low' suitability to support roosting bats, in accordance with best practice methodologies²⁸.
- A4.13. The survey aimed to identify bats emerging from or returning to a roost, if present within the buildings. A surveyor was positioned to allow views of each Potential Roost Feature (PRF); surveyor locations are shown on the Bat Survey Plan (ref: **17700/P01a**), appended to this report. The emergence survey was completed on 25th May 2025. Three surveyors were present for the survey.
- A4.14. The emergence survey was undertaken in accordance with best practice survey guidance, starting 15 minutes before sunset and finishing an hour and a half after sunset.
- A4.15. Two Batlogger M2's and an Anabat Scout alongside A Nightfox Whisker Night Vision Camera, Canon XA55 Infrared Camera and A Canon XA 10 Infrared Camera were used to identify bats during the surveys, and BatExplorer software was used to analyse bat calls for species identification. Analysts of the sound files had all completed BatAbility's Certificate of Bat Acoustic Analysis (COBAA)²⁹ assessment course.

²⁸ Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th Edition. The Bat Conservation Trust, London

²⁹ <https://batability.co.uk/cobaa/>



A4.16. The survey was completed during optimum weather conditions and these are detailed in below **Table A3.3** along with the date and sunrise time.

Table A3.3: Dusk Emergence Survey Metadata

Date: 25/05/2025	Start Time: 20:44	End Time: 22:29
Sunrise: 20:59	Weather at Start	Weather at End
Cloud Cover (%):	70%	100%
Wind (Beaufort):	1	1
Temperature (°C):	17	14
Precipitation:	Dry	Dry

Biodiversity Net Gain Assessment

A4.17. The Statutory Biodiversity Metric operates by calculating the number of biodiversity units associated with a particular habitat type (both pre-and post-development) – the ‘unit’ value associated with each habitat type is calculated based on the following parameters:

- Size (in hectares)/Length (in km);
- Distinctiveness (i.e. how rare/valuable a given habitat is);
- Condition (i.e. how well the recorded habitat fits [or will fit] the standardised description of that habitat); and
- Strategic significance (i.e. if the existing or proposed habitat is within an area formally adopted in the local plan for green infrastructure or biodiversity improvements).

A4.18. When considering the creation of new habitats in the post-development site, other factors are also considered when calculating the ‘unit’ value of a given habitat and these are:

- Time to reach the target condition of each habitat; and
- Difficulty category for the creation of a given habitat.

A4.19. A calculation has been undertaken using the baseline habitats identified during habitat condition assessment survey, which was carried out on 11th February 2025, alongside the ‘extended’ Phase 1 survey above. All surveys were carried out by Vicky King-Cline BSc MSc, a suitably experienced ecologist and qualifying member of CIEEM.

A4.20. The UK Habitat Classification was used to identify habitat types. Note that the calculation is completed separately for non-linear and linear habitats. Habitat areas entered into The Statutory Biodiversity Metric in hectares were rounded to three decimal places.



Evaluation

- A4.21. The evaluation of habitats and species is defined in accordance with published guidance³⁰. The scale of importance of each ecological feature is assigned within a defined geographical context, namely international and European, national, regional, county, and local. Below these are features considered to be of negligible importance.
- A4.22. Consideration will also be given to legally protected or controlled species which are 'important features' in the context of this assessment, for which mitigation measures are required to ensure legal compliance, regardless of their geographic scale of importance. Thus, it is possible for a feature of negligible ecological importance to be legally protected and hence require mitigation.
- A4.23. Evaluation is based on various characteristics that can be used to identify ecological features likely to be important in terms of biodiversity. These include site designations (such as Sites of Species Scientific Interest (SSSIs), or for undesignated features, the size, conservation status (locally, nationally or internationally), and the quality of the ecological feature. In terms of the latter, quality can refer to habitats (for instance if they are particularly diverse, or a good example of a specific habitat type), other features (such as wildlife corridors or mosaics of habitats) or species populations or assemblages.

Impact Assessment

- A4.24. The assessment of impacts identifies impacts and their effects as a result of the proposed development on important ecological features. This includes consideration of impacts at all relevant stages of the development, including construction and operation/occupation [include decommissioning and restoration, if relevant – it won't be for most projects]. The assessment includes reference to legislation and policy, and supplementary planning guidance where relevant.

Application of Mitigation Hierarchy

- A4.25. Application of the mitigation hierarchy is fundamental to the ecological impact assessment process. This requires consideration of the following measures, in order of priority, for all potential impacts, to determine the most appropriate mitigation, compensation and enhancement strategy for the project. This is taken into account within **Section 3** of this report and set out below:
- Avoidance – measures to avoid harm to ecological features (set out in 'Design Evolution', **Section 3**);
 - Mitigation – measures to avoid or minimise potential impacts as part of the design or guaranteed by planning controls;
 - Compensation – measures required to offset significant residual negative effects following avoidance and mitigation; and

³⁰ CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Chartered Institute of Ecology and Environmental Management, Winchester.



- Enhancement – measures over and above requirements for avoidance, mitigation and compensation to provide biodiversity net gain.



Appendix 5: Reptile Survey Methodology and Results

Legislation and Conservation Status

- A5.1. All of Britain's native reptiles are protected under the Wildlife and Countryside Act 1981 (as amended) (WCA). The four common species of reptile: adder *Vipera berus*, grass snake *Natrix natrix helvetica*, slow worm *Anguis fragilis* and common lizard *Zootoca vivipara* are listed on Schedule 5, Section 9, Parts 1 and 5, of the WCA and as such, it is an offence to:
- Intentionally kill, injure or take reptiles; and
 - Sell, offer or advertise for sale any live or dead specimen or anything derived from reptiles.
- A5.2. Smooth snake *Coronella austriaca* and sand lizard *Lacerta agilis* are afforded additional protection under the Conservation of Habitats and Species Regulations 2017 (as amended) but the site is not within the known geographical distribution of these species and no habitat exists within the site with the potential to support them, alongside this none were found to be present during the reptile surveys that took place and no records were found on the data search.
- A5.3. All native reptile species are Priority Species in the 'UK Post-2010 Biodiversity Framework which provides a statutory list of priority species in England, Scotland, Wales and Northern Ireland, as required under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 (England), Section 7 of the Environment (Wales) Act 2016, Section 2(4) of the Nature Conservation (Scotland) Act 2004, and Section 3(1) of the Wildlife and Natural Environment Act (Northern Ireland) 2011. Decision-makers such as Local Planning Authorities must have regard to Priority species in all their activities, including when making decisions on planning applications.

Methodology

- A5.4. Reptile surveys within the site were undertaken by Crest Environmental Management Ltd for Tyler Grange on the dates shown below in **Table A5.1**. These surveys were conducted in line with published guidance^{31 32}, and were completed within the active season for reptiles (March to October inclusive) by experienced field ecologists.
- A5.5. The areas of suitable habitat – limited to areas of ephemeral vegetation – were subject to specific reptile surveys. A total of 50 reptile refugia, comprising 0.5 x 1m pieces of bitumen roofing felt were deployed on 28th May 2025 within these areas. This generated a refugia density of 78/ha of suitable habitat.
- A5.6. Refugia were left in situ for eight days to settle in, before seven subsequent survey checks which were undertaken during suitable weather conditions – dry and air temperature between 9°C and

³¹ Froglife (1999) *Reptile Survey: an introduction to planning, conducting and interpreting surveys for snake and lizard conservation*. Froglife Advice sheet 10. Froglife, Halesworth.

³² Natural England (2022) Reptiles: advice for making planning decisions. Available at:

<https://www.gov.uk/guidance/reptiles-advice-for-making-planning-decisions#:~:text=This%20is%20Natural%20England's%20standing,standing%20advice%20for%20protected%20species>.



18°C, with intermittent sun and light winds. The timings and metadata for these surveys are shown in **Table A5.1** below.

- A5.7. During each visit, the refugia were checked visually from a distance to determine whether reptiles were basking on the surface. The refugia were then carefully approached and lifted to check for reptiles sheltering beneath them. Searches of natural refugia were also undertaken, where these were present.

Table A5.1: Dates and Weather Conditions of Reptile Surveys

Survey visit	Date	Weather conditions	Temperature (°C)
V1	05/06/2025	Warm & dry, slightly overcast	12
V2	17/06/2025	Warm & dry	18
V3	19/06/2025	Warm & dry	16
V4	03/07/2025	Warm & dry	17
V5	10/07/2025	Warm & dry	18
V6	25/07/2025	Warm & dry	16
V7	01/08/2025	Warm & dry	14



Results

A5.8. During each survey visit, refugia were examined for reptiles either basking on or sheltering underneath. No reptiles were found during the surveys, as detailed in **Table A5.2** below.

Table A5.2: Survey Results

Survey Visit	Date	Common Lizard				Slow Worm				Grass Snake				Adder			
		M/F				M/F				M/F				M/F			
		M	F	Juv	Unsexed	M	F	Juv	Unsexed	M	F	Juv	Unsexed	M	F	Juv	Unsexed
V1	06/06/2025	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
V2	17/06/2025	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
V3	19/06/2025	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
V4	03/07/2025	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
V5	10/07/2025	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
V6	25/07/2025	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
V7	01/08/2025	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0



Table 4.4: Total Peak Adult Count and Population Size

Populations/Count	Common Lizard	Slow Worm	Grass Snake	Adder
Total Peak Adult Count	0	0	0	0
Population Size	0	0	0	0

- A5.9. The ephemeral vegetation within the site offers suitable habitat for reptiles. As set out above in **Table A5.3** and **Table A5.4**, surveys undertaken at the site in 2025 recorded no sightings of any reptiles. Due to this, no further comment is made on any of the species



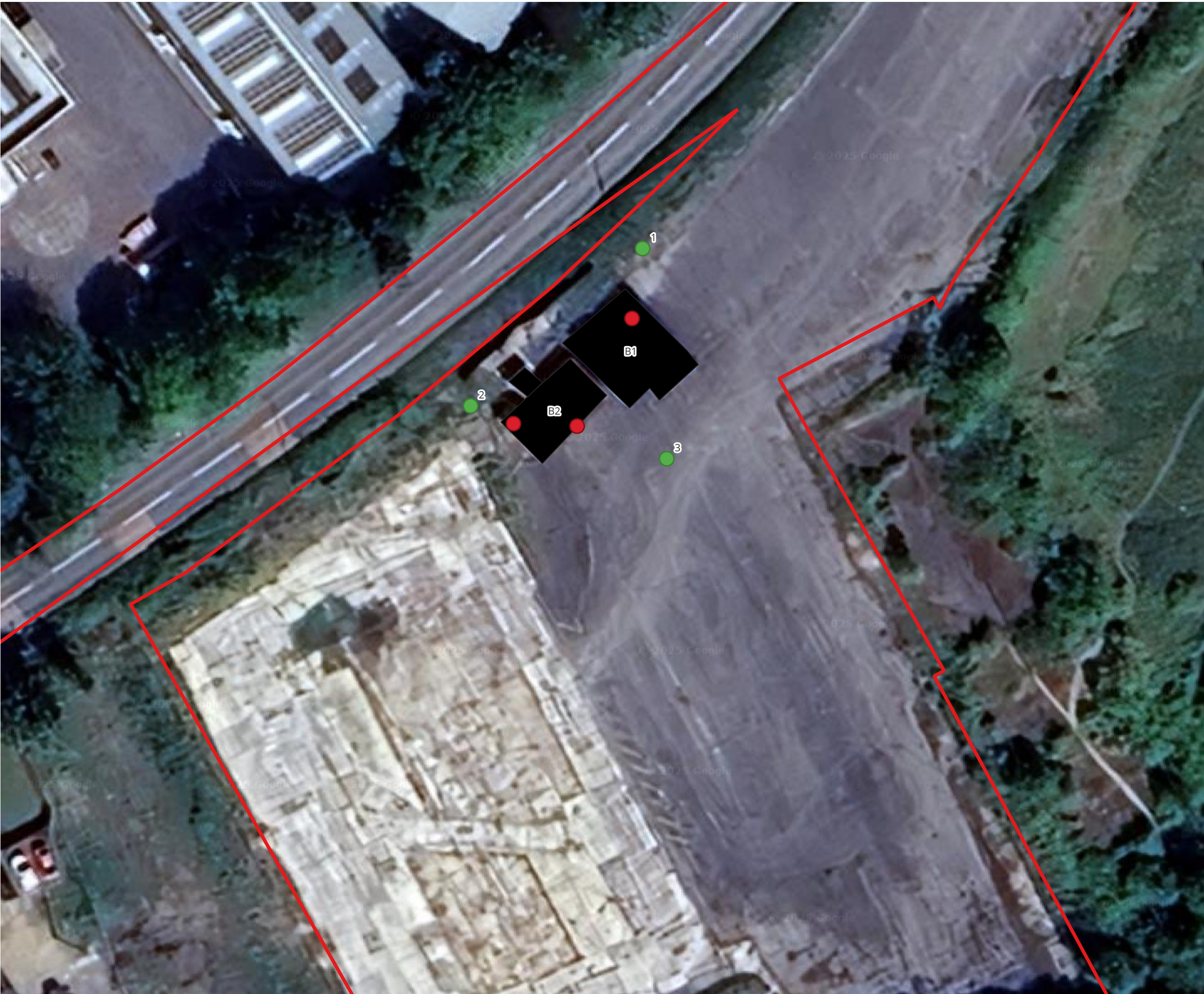
Plans:

Plan 1: Bat Survey Plan **17700/P01a**

Plan 2: Habitat Features Plan **17700/P02a**

Plan 3: Habitat Features Plan – Pre 2024 Estate Management **17700/P03a**





Legend

Full Application Boundary

Surveyor Locations

● 1

● 2

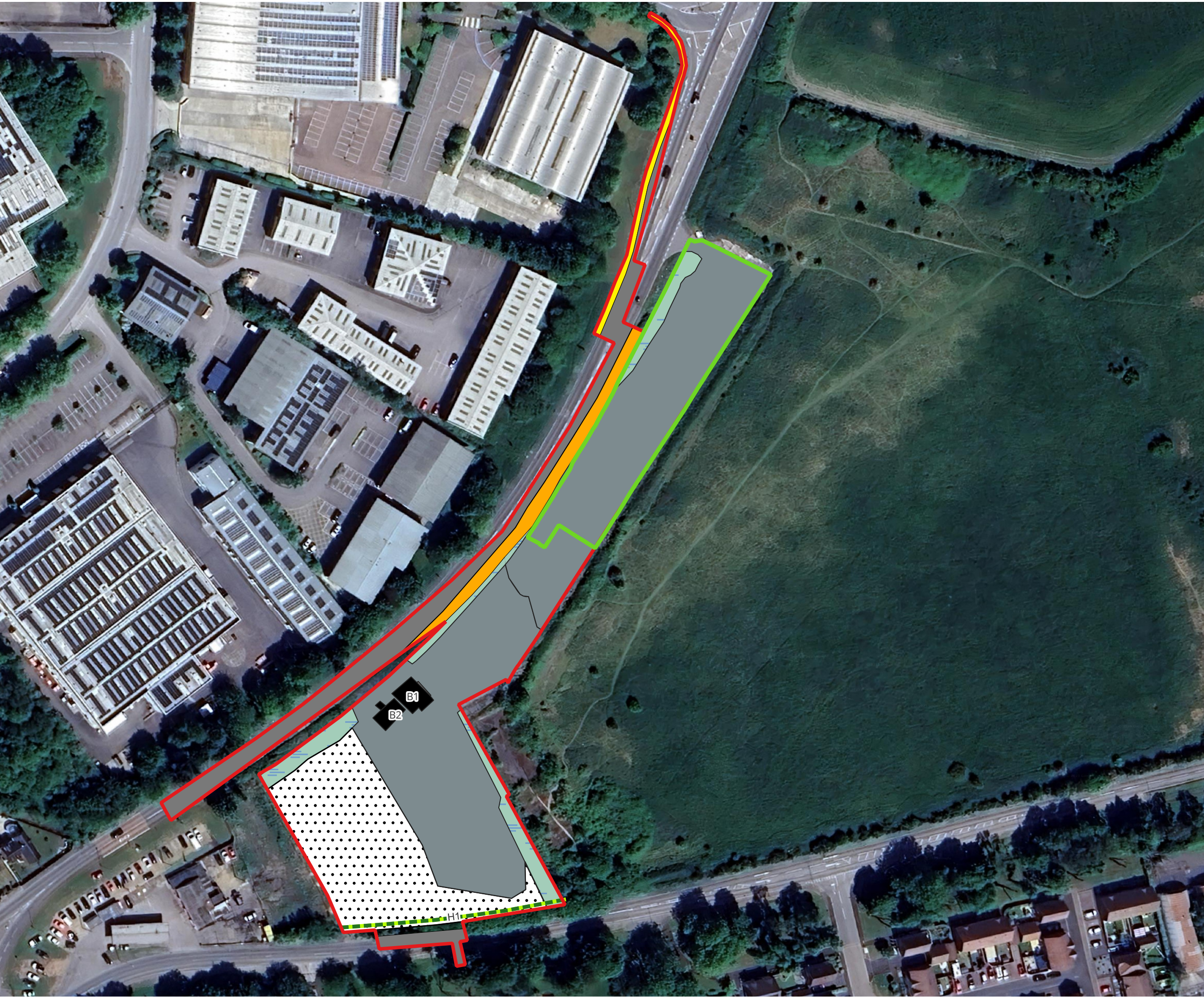
● 3

● Potential Roost Feature Locations



Project	London Road, Devizes
Drawing Title	Bat Survey Plan
Scale	Scale: 1:400
Drawing No.	PN17700/P01a
Date	February 2026
Checked	HB/HDBJ





- Legend
- Outline application boundary
 - Full application site boundary
 - Buildings
 - Grassland
Modified grassland
 - Grassland
Other neutral grassland
 - Urban
Developed land; sealed surface
 - Ephemeral vegetation
 - Sealed surface/bare ground
 - Native hedgerow with trees
associated with bank



Project	London Road, Devizes
Drawing Title	Habitat Features Plan (post estate management)
Scale	Scale: 1:1,300
Drawing No.	17700/P02
Date	February 2026
Checked	VKC





-  Full application boundary
-  Outline application boundary
-  Scattered Trees
-  Native hedgerow with trees associated with bank
-  Other neutral grassland
-  Grassland
Modified grassland
-  Other woodland; broadleaved
-  Heathland and shrub
Bramble scrub
-  Mixed scrub
-  Sparsely vegetated land
Ruderal/Ephemeral
-  Hardstanding
-  Buildings



Project	London Road, Devizes
Drawing Title	Habitat Features Plan - (pre- estate management)
Scale	Scale: 1:1,300
Drawing No.	17700/P03a
Date	February 2026
Checked	PW



97 Icknield Street, Hockley, Birmingham, B18 6RU
T: 0121 828 4043 E: hello@tylergrange.co.uk
W: www.tylergrange.co.uk



Step into our world

www.tylergrange.co.uk



**Tyler
Grange**

Landscape | **Ecology** | **Arboriculture**