ECOLOGY & BIODIVERSITY NET GAIN (BNG) ASSESSMENT

12th November 2025

Spectra Commercial Vehicle Repairs, 9 Quartermaster Road, West Wilts Trading Estate, Westbury BA13 4JT

Applicant: Kevin Sheppard

Agent: Western Design Architects

ABR Ecology Ltd

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

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

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

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

SURVEY DATA LIFESPAN AND VALIDITY OF THIS REPORT:

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

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

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

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

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EXECUTIVE SUMMARY

- ABR Ecology Ltd were commissioned by Western Design Architects on behalf of Mr Kevin Sheppard to produce an Ecology and Biodiversity Net Gain (BNG) Assessment to inform a full application for *'an extension to the existing warehouse'* at Spectra Commercial Vehicle Repairs, 9 Quartermaster Road, West Wilts Trading Estate, Westbury BA13 4JT.

Survey background:

- A Preliminary Roost Assessment (PRA) was conducted on the 24th September 2025 by Natural England class 2 licensed ecologist Phil Smith ACIEEM and assistant ecologist Jonathan Cornish. The PEA survey of the site was conducted on the 24th September 2025 by Natural England class 2 licensed ecologist and experienced, FISC Level 4 botanist Phil Smith ACIEEM and assistant ecologist Jonathan Cornish.

Habitats:

- Habitats on-site include a single-skin, light industrial workshop building (u1b5 817), developed land; sealed surface (u1b6) and a small area of bramble scrub (h3d 524) containing the invasive non-native species Himalayan cotoneaster (*Cotoneaster simonsii*). Several trees are present on the northeast and northwest site boundary. Four of these will be removed by the proposed works.

Protected sites:

- The development does not fall a protected area, and the works will not impact upon a statutory or non-statutory site. No mitigation will be required, and no further recommendations are made in relation to protected sites.

Non-native and invasive species (NNIS):

- Himalayan cotoneaster is present on-site within the bramble scrub close to the fence in the northeast. This is a highly invasive species listed under Schedule 9 of The Wildlife and Countryside Act 1981 (as amended); advice on its removal from site is provided in Section 5.

Biodiversity net gain – metric results:

- The development is anticipated to result in a percentage net loss of -100% in habitat units post-development. Off-site units or statutory biodiversity credits are now

required to meet the 10% net gain in area habitats. Units/credits are not required for hedgerows or watercourses. Further information is provided in Section 5.

Badgers:

- Badgers are not considered likely to be impacted by the development and no further action is advised for this species.

Barn owls:

- No impacts on barn owls are anticipated, and no mitigation is advised for this species.

Bats:

Roosts in buildings

- The industrial, single-skin corrugated steel workshop building on-site was assessed and deemed to hold 'negligible potential' for roosting bats. Therefore, no further action relating to bats roosting in buildings is advised. Further information is provided in Section 5 regarding the validity of this report.

Roosts in trees

- The trees on-site were considered to hold 'negligible potential' for roosting bats. Therefore, no impacts on roosting bats are anticipated as part of the works; further information is provided in Section 5 regarding the validity of this report.

Commuting and foraging habitats

- The site holds some potential for commuting and foraging bats. Measures for lighting reduction are detailed in Section 5 to minimise impacts of obtrusive lighting on foraging and commuting bats that may be using the gardens and general surrounding area.

Great crested newts (GCN):

- No impacts on GCN are anticipated and no mitigation is advised for this species.

Nesting birds:

- No evidence of nesting birds or potential for nesting birds was recorded during the visit. Therefore, nesting birds are not considered to be impacted by the development.

Hedgehogs:

- The site possesses minimal foraging habitat for hedgehogs, but it is possible that hedgehogs commute across the site. Mitigation for this species is detailed in Section 5.

Reptiles and common amphibians (herpetofauna):

- Reptiles and amphibians are not considered likely to be impacted by the development and no further action is advised for these species.

Biodiversity enhancements:

- Biodiversity enhancements will include a bird box and bug house. Details are provided in Section 5.

1. INTRODUCTION

1.1 ABR Ecology Ltd were commissioned by Western Design Architects on behalf of Mr Kevin Sheppard to produce an Ecology and Biodiversity Net Gain (BNG) Assessment to inform a full application for *'an extension to the existing warehouse'* at Spectra Commercial Vehicle Repairs, 9 Quartermaster Road, West Wilts Trading Estate, Westbury BA13 4JT (central grid reference: ST 85848 52789) (herein referred to as 'the site' / 'on-site').

1.2 A Preliminary Ecological Appraisal (PEA) including a Daytime Bat Walkover (DBW) was conducted on the 24th September 2025 by experienced botanist and Natural England class 2 licensed ecologist Phil Smith ACIEEM and assistant ecologist Jonathan Cornish.

1.3 A site location plan is provided in Appendix A and proposed plans are provided in Appendix B.

Site context

1.4 The application site is located within the West Wilts Trading Estate in Westbury, Wiltshire, and comprises an operational industrial workshop used for commercial vehicle repairs. The immediate surrounding area is characterised by extensive industrial and commercial land use and scattered mature trees. The wider landscape comprises commercial and residential development, pockets of woodland, arable and pasture farmland and railway infrastructure. Given the highly urbanised and industrial nature of the setting, the site and its immediate surroundings offer limited opportunities for wildlife..

Purposes and aims of this assessment

1.5 This assessment primarily aims to determine the biodiversity value of the site and looks to identify the presence/likely absence of protected and vulnerable species on-site. This report also evaluates whether there will be any potential development impacts on species and habitats; and identifies whether mitigation and/or protected species licensing is required to ensure the development complies with legislation and national and local planning policy.

1.6 This assessment also estimates the Biodiversity Net Gain (BNG) anticipated to be generated by the current proposals for the site, as measured using the Statutory Biodiversity Metric (Natural England, 2025a) (current version 03.07.2025); and follows guidance set out within the Biodiversity Net Gain: Good Practice Principles

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

Legislation and planning policy

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

- *The National Planning Policy Framework (NPPF) 2024 – Section 15*
- *The Environment Act 2021 – Schedules 7a and 14 Parts 1 and 2*
- *Town and Country Planning Act 1990 – Schedule 7A (as inserted by Schedule 14 of the Environment Act 2021)*
- *The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019*
- *The Wildlife and Countryside Act 1981 (as amended) – Section 1 and Schedules 5 and 9*
- *The Natural Environment and Rural Communities (NERC) Act 2006 – Sections 40 and 41*
- *Circular 06/05: Biodiversity and Geological Conservation – Statutory Obligations and Their Impact Within the Planning System*
- *The Wiltshire Core Strategy (Adopted January 2015)*
- *The Wiltshire and Swindon Local Nature Recovery Strategy – consultation draft 2025 (Wiltshire Council, Swindon Borough Council & Natural England, 2025)*

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

2. METHODOLOGY

Desktop data search

2.1 Protected sites under the UK National Site Network including Special Protection Areas (SPAs) and Special Areas of Conservation (SACs), and Ramsar's were identified within 7.5 kilometre (km) of the site; and Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNRs), and Local Nature Reserves (LNRs) were identified within 2km of the site using the Multi-Agency Geographical Information for the Countryside (MAGIC) website (MAGIC, 2025).

2.2 A search was also conducted on MAGIC (2025) to identify the potential presence of priority habitats, European Protected Species (EPS) licences and known great crested newt breeding ponds.

2.3 Wiltshire & Swindon Biological Records Centre (WSBRC) (2025) were contacted to provide records of protected, vulnerable and notable species, Local Wildlife Sites (LWS) and Ecological Networks within a 1km radius of the application site.

2.4 This information was used to evaluate the potential of the site for protected and vulnerable species, and to determine whether there is potential for development impacts on these species, surrounding habitats and protected sites.

2.5 To inform the BNG assessment, a desktop study was undertaken to determine strategic significance of habitats. This comprised a review of the following:

- Multi-Agency Geographic Information for the Countryside (MAGIC) online database (accessed September 2025) to identify any statutory nature conservation designations.
- Data search response from WSBRC (September 2025).
- The Wiltshire Core Strategy (Wiltshire Council, 2015).
- The Wiltshire and Swindon Local Nature Recovery Strategy – consultation draft 2025 (Wiltshire Council, Swindon Borough Council & Natural England, 2025).

Botanical survey (UKHab)

2.6 A botanical survey of the site was conducted on 24th September 2025 by experienced botanist Phil Smith ACIEEM and assistant ecologist Jonathan Cornish.

2.7 The survey involved a detailed flora survey of habitats, and each flora species was allocated an abundance in accordance with the DAFOR scale, using local (L) as a pre-fix where a species was restricted in distribution across the habitat:

D – Dominant

A – Abundant

F – Frequent

O – Occasional

R – Rare

2.8 Habitats on-site were classified in accordance with the UKHab Classification System, using the UK Habitat Classification Definitions document Version 2.0 (UKHab Ltd, 2023[1]) and UKHab Field Key Version 2.1 (UKHab Ltd, 2023[2]). Other features of ecological interest were identified using 'target notes'.

2.9 All mapping was undertaken digitally within the Coreo app (Coreo, 2025) and the geopackage was then imported back into QGIS.

Statutory biodiversity metric

Baseline and proposed habitat mapping

2.10 Pre and post-development habitat maps were digitised using the QGIS template associated with the Statutory Biodiversity Metric (Natural England, 2025b). The proposed site plan (as shown in Appendix B) was georeferenced, and habitats were overlain using this plan.

2.11 Information was entered for each parcel including habitat type, condition, strategic significance, a unique habitat parcel reference, a retention category and a spatial risk category for both on-site and offsite proposed habitats (where applicable).

Strategic significance

2.12 Habitats within the site were assessed to identify whether these occurred within any strategic locations for biodiversity; if a Local Nature Recovery Strategy (LNRS) was published for the Local Planning Authority, a search of the LNRS was conducted to determine if any proposed habitats within the site fall within a strategic location for a target habitat type in that particular location.

Measurements of Habitat Areas

2.13 Baseline and proposed habitat areas were measured as distinct habitat parcels. Baseline habitat parcels were measured using habitat mapping and aerial

photography overlain in QGIS and Coreo. Post-development habitat parcels were calculated by measuring the proposed site plan (as shown in Appendix B).

2.14 Data from the QGIS template was then transferred to the Statutory Biodiversity Metric Calculation tool using the QGIS Import Tool associated with the Metric.

Surveyor competencies and relevant training

2.15 Phil Smth ACIEEM undertook the baseline survey assisted by assistant ecologist Jonathan Cornish; both ecologists have undertaken CIEEM certified training in the Biodiversity Metric 4.0 and UK Habs.

Protected species assessment

Badgers

2.16 [redacted]

Barn owls and other nesting birds

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

Bats

Daytime Bat Walkover (DBW)

2.18 A Daytime Bat Walkover (DBW) survey was conducted to record any habitats suitable for roosting bats; this included an inspection of buildings and trees for bat suitability as detailed below.

Survey conditions, equipment and timings

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

Table 1: Weather conditions, equipment and timings for survey

Survey date	Time of survey	Surveyor(s)	Equipment available for use	Weather conditions		
24/09/2025	11:00am	Phil Smith ACIEEM and	High-powered torch, mirrors, sealable bags, FFP3 face	Temp:	Okta cloud cover:	Beaufort wind force:

		Jonathan Cornish	masks, gloves, extendable ladder, endoscope, binoculars	13°C	2/8	2/12

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

Buildings

2.21 The PRA was undertaken in accordance with The Bat Conservation Trust (BCT) Good Practice Guidelines 4th ed (Collins, 2023). A systematic search was made of any internal building areas / loft spaces and exterior building areas. Where present, information was compiled on the potential and actual bat entry/exit points (where possible); potential and actual bat roosting locations; and any evidence of bats found.

2.22 The external building assessment included an inspection of the ground/flooring, and where present, any windowsills, windowpanes, behind peeling paintwork/lifted render, brick/block work, chimneys, eaves, lead flashing, tiles and soffits etc.

2.23 Evidence of roosting bats in buildings can include:

- The presence of physical live/deceased bats
- Bat droppings (distinguished from rodent droppings by their crumbly texture)
- Fur-oil staining around entry/exit points
- Urine splashing
- Feeding remains, such as insect wings and casings

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

2.25 Most native bats in England are crevice-dwelling species, with bats roosting in remote areas, such as under roof tiles; behind cladding; in cavities; soffits; and behind lead flashing etc, and evidence of these species is often concealed and/or inaccessible. Therefore, where no evidence of roosting bats was recorded, an

assessment on the availability of potential roosting areas and bat exit/entry points around the buildings was conducted. The buildings were then assigned a category based on a sliding scale of potential for bats, ranging from 'none' to 'high' (Collins, 2023) (Table 2 below):

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

Bat roosting potential	Description
'High'	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis & potentially for longer periods of time due to their size, shelter, protection, conditions (temperature, humidity, height above ground level, adverse light levels, or high levels of disturbance), and surrounding habitat. The structure has the potential to support high conservation status roosts for example maternity or classic cool/stable hibernation sites.
'Moderate'	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions (temperature, humidity, height above ground level, adverse light levels, or high levels of disturbance), and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity & hibernation and this is made irrespective of species conservation status, which is established after presence if confirmed via the PRA).
'Low'	The building features one or more potential roosting features that could be used by bats opportunistically at any time of year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions (temperature, humidity, height above ground level, adverse light levels, or high levels of disturbance) and/or suitable surrounding habitat to be used on a regular basis or by a larger number of bats.
'Negligible'	There are no obvious habitat features likely to be used by bats, however there is a small element of uncertainty as bats can use small and apparently unsuitable features on occasion. (*negligible is defined as 'so small or unimportant as to be not worth considering, insignificant'. This category may be used where there are places that a bat could roost or forage (due to one attribute), but it is unlikely that they would (due to another attribute).

'None'	No habitat features on site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels).

Trees

2.26 A Ground-Level Tree Assessment (GTLA) was undertaken in accordance with The BCT Guidelines (Collins, 2023). A systematic search was made of any trees on-site for bats and where present, information was compiled on the potential and actual bat entry/exit points (where possible); potential and actual bat roosting locations; and any evidence of bats found.

2.27 The inspection was carried out systematically and consistently around all parts of each tree (from all angles and close to the trunk and further away). Potential Roosting Features (PRFs) that can be exploited by bats include the following (Table 3 below):

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

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

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

Table 4: Categories for assigning tree potential for roosting bats

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

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

Table 5: Categories for assigning tree potential for roosting bats

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

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

Dormice

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

Great crested newts

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

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

2.34 The Natural England 'GCN Risk Zones' map (Natural England, 2025c) was accessed to determine what risk zone the application site falls within under the GCN District Level Licence (DLL) scheme.

Reptiles and common amphibians (herpetofauna)

2.30 An appraisal of the site was conducted to evaluate suitable habitats for common British reptiles, such as slow worm *Anguis fragilis*, common lizard *Zootoca vivipara*, grass snake *Natrix helvetica* and adder *Vipera berus*, and common amphibians such as common frog *Rana temporia*.

2.31 Suitable habitats include those with a varied structure, offering a range of niches for basking and foraging, coupled with sunny areas to allow thermoregulation. Typical habitats include rough and unmanaged grassland with shorter margins, heathland, woodland, scrub and ruderal vegetation, and can include urban settings such as gardens with compost heaps. Potential overwintering (hibernation) sites can include piles of materials such as rubble/logs, rockeries and at the base of buildings/stone walls.

Survey limitations and assumptions

PEA, PRA and UKHab surveys

2.32 The UKHabs habitat survey was conducted at an optimal time of the year (spring/summer) for general botanical survey, though management may have removed some identifiable features from the flora.

2.33 Evidence of crevice-dwelling bats may have been missed due to the concealed nature of bat roosts. Binoculars were used to identify any potential bat droppings on the exterior features of the buildings/trees.

2.34 An aerial search for waterbodies can be constrained by the accuracy of online maps. Several websites were accessed to minimize the chances of missing waterbodies, however, garden ponds within residential properties are very rarely mapped and it is possible that waterbodies have been overlooked as part of this assessment.

2.35 The site visit provides a 'snapshot' of the site and does not take into account seasonal variation. Species may have been overlooked due to the constraints of the season and time of which the survey was undertaken.

2.36 Certain species, such as bats and nesting birds, are highly mobile and it is therefore possible for these species to occupy the site at any time in the future, particularly if

any alterations/changes occur to the site. The survey only provides a 'snapshot' in time and does not account for seasonal variation. As such, it is not possible to have complete certainty that species are not present, rather, there was no indication of their presence at the time of survey.

DEFRA Statutory Biodiversity Metric

2.37 The Statutory Biodiversity Metric calculation relies upon outputs of biodiversity unit calculations which are not absolute values or scientifically precise. Therefore, the Metric's results interpreted within caution.

2.38 The Metric calculation does not change the legislation afforded to biodiversity; individual species and protected/irreplaceable habitats are outside of the scope of the Metric and are addressed separately within this assessment

2.39 The accuracy of habitat area measurements is constrained by baseline data collection and the resolution of the proposed site plan. QGIS has been used to calculate habitat areas which have been aligned with Google Maps satellite imagery and the site location and proposed site plans.

2.40 Habitat conditions for proposed habitats were assigned on a precautionary approach and with consideration of biological and operational phase conditions (i.e. which may limit the degree to which 'good' condition is likely to be reached).

Reporting and survey data lifespan

2.41 The data within this report should not be seen as comprehensive. Data obtained from the data search (WSBRC, 2025) is unlikely to provide a complete record of species within the search area. It is possible that a species may occur within the vicinity of the site that has not been identified within the data search.

2.42 Survey data is considered valid for 12 months from the survey date in accordance with the Chartered Institute of Ecology and Environmental Management (CIEEM) Advice note (CIEEM, 2019) due to the presence of and/or potential for mobile species to be present within the site.

2.43 **Survey data is only intended for the proposals outlined within this report.** If any material changes to the site occur and/or if the nature and/or extent of the proposed development changes, an update visit to reassess the site will be required, and any conclusions provided herein may not be relied upon.

3. RESULTS

Desktop data search

Internationally, nationally and regionally protected (statutory) sites

3.1 MAGIC (MAGIC, 2025) was used to identify any international statutory sites located within 7.5km of the application-site and national/local sites within 2km of the site. Results are presented in Table 6 below:

Table 6: Internationally, nationally and regionally protected (statutory) sites

Site name	Distance from site	Designation	Site description
Picket and Clanger Wood	1.7km northeast	SSSI	Picket and Clanger Wood is a floristically rich ancient woodland supporting an outstanding range of butterfly species. The combined butterfly and moth faunas include several scarce species with limited national distributions, among them two which are rare and vulnerable in Great Britain. The site also accommodates a diversity of birds characteristic of ancient woodland in southern and western England.
Westbury Ironstone Quarry	1.8km southwest	SSSI	Nationally important type locality for the Upper Oxfordian Westbury Iron Ore, with key ammonite and bivalve fossils of high stratigraphic and paleoenvironmental value.
Salisbury Plain	4km southeast	SPA	During the breeding season the SPA regularly supports at least 14.5% of the stone-curlew western European population, 20% of the British gauil population, 1.2% of British hobby population and over winter the SPA regularly supports 0.7% of the British hen harrier population.
Salisbury Plain	4km southeast	SAC	Designated for Annex I habitats Juniperus communis formations on heaths or calcareous grasslands and semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) and Annex II species Marsh fritillary butterfly Euphydryas (Eurodryas, Hypodryas) aurinia.

Impacts on statutory sites

3.2 No impacts on statutory sites are anticipated due to the scale of the proposed works, sufficient distance and presence of landscape buffers between the application site and the statutory sites.

3.3 No further mitigation is recommended in relation to statutory sites.

Locally designated (non-statutory) sites

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

Table 7: Locally designated (non-statutory) sites

Site name	Distance from site	Designation	Site description
Westbury Lakes	930m southeast	Local Wildlife Site (LWS)	Two large open areas of freshwater near the railway intersections at Westbury.

Impacts on non-statutory sites

3.5 No impacts on non-statutory sites are anticipated due to sufficient distance and presence of landscape buffers. Therefore, no further mitigation is recommended in relation to non-statutory sites.

Priority habitats (S.41 NERC Act 2006)

3.4 The nearest area of priority habitat is an area of 'Deciduous Woodland' situated approximately 80m northwest of the site (MAGIC, 2025). No impacts upon this habitat are anticipated due to the small-scale nature of the works, sufficient distance and presence of landscape buffers between the site and the woodland.

Protected, rare and vulnerable species

3.5 WSBRC (2025) was consulted to provide any records of protected/vulnerable species of interest within a 1km radius of the application site as presented in Table 8 below:

Table 8: Records for protected/vulnerable species of interest

Common name	Taxonomic name	Number of records	Latest record	Nearest record to site
Bats				
Bechstein's bat	*Myotis bechsteinii*	1	2006	Within 1km
Brandt's bat	*Myotis brandtii*	1	2020	Within 1km
Brown long-eared bat	*Plecotus auritus*	3	2021	810m northeast
Common pipistrelle	*Pipistrellus pipistrellus*	322	2021	290m east
Daubenton's bat	*Myotis daubentonii*	4	2017	310m northwest
Greater horseshoe bat	*Rhinolophus ferrumequinum*	5	2020	410m east
Horseshoe bat species	*Rhinolophus sp.*	1	2008	410m east
Leisler's bat	*Nyctalus leisleri*	5	2020	410m east
Lesser horseshoe bat	*Rhinolophus hipposideros*	16	2021	290m east
Long-eared bat species	*Plecotus sp.*	7	2020	410m east
Myotis bat species	*Myotis sp.*	22	2021	410m east
Nathusius's pipistrelle	*Pipistrellus nathusii*	2	2020	410m east
Natterer's bat	*Myotis nattereri*	2	2008	810m east
Noctule	*Nyctalus noctula*	328	2021	290m east
Nyctalus bat species	*Nyctalus sp.*	5	2020	410m east
Pipistrelle bat species	*Pipistrellus sp.*	14	2021	510m east
Serotine	*Eptesicus serotinus*	23	2021	410m east

Soprano pipistrelle	*Pipistrellus pygmaeus*	97	2021	290m east
Western barbastelle	*Barbastella barbastellus*	2	2020	405m southeast
Whiskered bat	*Myotis mystacinus*	7	2020	Within 1km
Whiskered/Brandt's bat	*Myotis mysacinus/brandtii*	3	2020	Within 1km
Other mammals				
Eurasian badger	*Meles meles*	8	2013	600m east
West European hedgehog	*Erinaceus europaeus*	13	2022	450m east
Rabbit	*Oryctolagus cuniculus*	14	2007	800m south
Water vole	*Arvicola amphibius*	2	1986	Within 1km
Reptiles and amphibians				
Adder	*Vipera berus*	1	2010	915m southeast
Common lizard	*Zootoca vivipara*	2	2010	640m east
Common frog	*Rana temporaria*	4	1999	635m southeast
Grass snake	*Natrix helvetica*	11	2010	640m east
Great crested newt	*Triturus cristatus*	18	2017	630m southeast
Slow-worm	*Anguis fragilis*	17	2010	540m northeast
Birds				
Barn owl	*Tyto alba*	1	2021	Within 1km
Black tern	*Childonias niger*	1	2006	Within 1km
Black-headed gull	*Chroicocephalus ridibundus*	21	2018	Within 1km
Bullfinch	*Pyrrhula pyrrhula*	2	2020	Within 1km
Collared dove	*Streptopelia decaocto*	3	2021	Within 1km
Common gull	*Lanus canus*	18	2008	Within 1km
Common sandpiper	*Actitis hypoleucos*	2	2017	Within 1km
Common tern	*Sterna hirundo*	4	2006	Within 1km
Coot	*Fulica atra*	6	2018	915m southeast
Cormorant	*Phalacrocorax carbo*	2	2018	Within 1km
Cuckoo	*Cuculus canorus*	1	2019	Within 1km
Dunnock	*Prunella modularis*	10	2019	Within 1km
Gadwall	*Maraca strepera*	1	2006	Within 1km
Garganey	*Spatula querquedula*	1	2021	Within 1km
Great black-backed gull	*Larus marinus*	1	2005	Within 1km
Great crested grebe	*Podiceps cristatus*	31	2021	915m southeast
Great northern diver	*Gavia immer*	2	2008	Within 1km
Great white egret	*Ardea alba*	1	2020	Within 1km
Greenfinch	*Chloris chloris*	3	2018	Within 1km
Grey heron	*Ardea cinerea*	14	2010	915m southeast
Grey wagtail	*Motacilla cinerea*	16	2021	Within 1km
Greylag goose	*Anser anser*	1	2021	Within 1km
Herring gull	*Larus argentatus*	24	2021	Within 1km
House martin	*Delichon urbicum*	5	2020	Within 1km
House sparrow	*Passer domesticus*	3	2021	Within 1km
Kingfisher	*Alcedo atthis*	5	2010	Within 1km
Lapwing	*Vanellus vanellus*	1	2021	Within 1km
Lesser black-backed gull	*Larus fuscus*	9	2021	Within 1km
Lesser spotted woodpecker	*Dryobates minor*	1	2010	915m southeast
Little egret	*Egretta garzetta*	7	2021	910m southeast
Mallard	*Anas platyrhynchos*	9	2021	915m southeast
Meadow pipit	*Anthus pratensis*	4	2021	Within 1km
Merlin	*Falco columbarius*	1	2020	Within 1km
Moorhen	*Gallinula chloropus*	3	2021	915m southeast
Nightingale	*Luscinia megarhynchos*	6	2018	Within 1km
Nightjar	*Caprimulgus europaeus*	2	2023	Within 1km
Oystercatcher	*Haematopus ostralegus*	1	2010	915m southeast
Peregrine	*Falco peregrinus*	2	2021	Within 1km
Pochard	*Aythya ferina*	11	2006	915m southeast
Red kite	*Milvus milvus*	3	2020	Within 1km
Redwing	*Turdus iliacus*	1	2021	Within 1km
Rook	*Corvus frugilegus*	2	2019	Within 1km

Sedge warbler	Acrocephalus schoenobaenus	2	2005	Within 1km
Shoveler	*Spatula clypeata*	2	2020	Within 1km
Skylark	*Alauda arvensis*	1	2014	Within 1km
Snipe	*Gallinago gallinago*	1	2021	Within 1km
Sparrowhawk	*Accipiter nisus*	1	2021	Within 1km
Spotted flycatcher	*Musciapa striata*	1	2021	Within 1km
Starling	*Sturnus vulgaris*	4	2021	Within 1km
Stock dove	*Columba oenas*	1	2019	Within 1km
Swift	*Apus apus*	1	2020	Within 1km
Teal	*Anas crecca*	1	2006	Within 1km
Whitethroat	*Curruca communis*	14	2020	Within 1km
Wigeon	*Maraca penelope*	1	2006	Within 1km
Willow warbler	*Phylloscopus trochilus*	15	2021	Within 1km
Woodpigeon	*Columba palumbus*	5	2021	Within 1km
Wren	*Troglodytes troglodytes*	11	2019	Within 1km
Yellow-browed warbler	*Phylloscopus inornatus*	17	2020	Within 1km
Yellowhammer	Emberiza citrinella	1	2004	Within 1km
Yellow-legged gull	*Larus michahellis*	5	2006	Within 1km
Invertebrates				
Jersey tiger	*Euplagia quadripunctaria*	1	2023	Within 1km
Small heath	*Coenonympha pamphilus*	2	2006	750m south
Wall	*Lasiommata megera*	1	2006	750m south
Plants				
Bluebell	*Hyacinthoides non-scripta*	2	2015	910m southeast

3.6 There are nearby records for bats, [redacted] hedgehog, reptiles and amphibians; these species are discussed further on in Section 3.

Bat SAC Consultation Zone

3.7 The site falls within the Bath and Bradford-on-Avon (BoA) Bat SAC consultation zone (WSBRC, 2025); the site is situated within a highly urban setting with industrial land surrounding the site. There is a treeline running along Quartermaster Road to the north; however, a road is present here with street lighting and is therefore unlikely to be utilized by the bats associated with the SAC.

3.8 An area of woodland is present approximately 180m southeast, however, this is considered to be at a sufficient distance from the development site that artificial lighting would not have an impact on bats potentially using the woodland.

3.9 Therefore, no impacts on the Bath and BoA Bat SAC are anticipated as part of the application and no further action is advised in relation to the development.

Botanical survey (UKHab)

Habitats recorded on-site

3.10 Habitats recorded within the site are listed in Table 9 below (a habitat map with species lists for each habitat are provided in Appendix D and photographs provided in Appendix E of this report):

Table 9: Habitats recorded on-site

Habitat	UKHab primary code	UKHab secondary code(s)	Description and UKHAB secondary code(s)	Location within site
Buildings	u1b5	817	Single-skin steel panelled light industrial workshop.	East.
Developed land; sealed surface	u1b6	n/a	Concrete surrounds the light industrial workshop.	North, east and south.
Bramble scrub	h3d	524	A small square of bramble scrub containing the invasive, non-native species Himalayan cotoneaster is present on-site.	A small square close to the fence in the northeast.
Urban tree	u	32	A large, mature tri-stemmed goat willow *Salix caprea* is present on the northern red line boundary	Northern red line boundary.

Impacts of development on habitats

3.11 The development consists of an extension to the existing warehouse, infilling the northeastern corner to square off the footprint of the workshop. The new extension will be built on the existing concrete. The development will result in the loss of a large tree: a mature tri-stemmed goat willow as shown in the proposed site plan (see Appendix B). A small area of bramble scrub will also be lost as part of the proposed development.

3.12 The results of the metric, undertaken to calculate measurable habitat losses/gains, are provided under Section 4 of this report.

Invasive Non-native Species (INNS)

3.13 Himalayan cotoneaster, a highly invasive non-native species listed under Schedule 9 of The Wildlife and Countryside Act (1981) (as amended), was recorded on-site. This species should be removed from site to prevent further spread; advice is provided in Section 5 of this report.

Protected species assessment

Badgers

3.14 [redacted]

3.15 [redacted]

Barn owls and other nesting birds

3.16 No evidence of barn owls was present on-site, and the habitats do not offer suitable habitat for this species. Therefore, barn owls are not considered to be impacted by the proposals and are not discussed further in this assessment.

3.17 No evidence of nesting birds was identified within the site during the survey. There is potential for nesting birds to be using the bramble scrub and individual tree that are being removed. Therefore, mitigation for nesting birds is provided in Section 5 of this report.

Bats

Daytime Bat Walkover (DBW)

Roosting bats - Buildings

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

Table 10: Building description

<table>
<tr><th>Building</th><th colspan="2">Description</th></tr>
<tr><td rowspan="9">Warehouse ('B1')</td><td colspan="2">• A large warehouse used for vehicular repairs is present to the west of the site.
• The building is constructed from corrugated steel panels and brick walls.
• The roof is shallow pitched, constructed of corrugated steel panels and contains skylights.
• Large commercial rolling doors are present.
• uPVC window and door frames are present in the brick-built reception area of the building.
• No internal loft void is present within the building.</td></tr>
<tr><td>Potential bat entry/exit points:</td><td>Potential roosting areas:</td></tr>
<tr><td>- No ingress points considered suitable for bats were identified around the property; one gap was present in the soffit; however, this was recently made and was very exposed / open and not considered likely to be used by bats.</td><td>- Due to a lack of access, no potential roosting areas were identified.</td></tr>
<tr><td colspan="2">Evidence of bats recorded:</td></tr>
<tr><td colspan="2">- No evidence of bats was recorded within or around the building.</td></tr>
<tr><td colspan="2">DNA analysis of dropping sample (as tested by Swift Ecology Ltd):</td></tr>
<tr><td colspan="2">- n/a</td></tr>
<tr><td colspan="2">Roost status / potential of the building for bats:</td></tr>
<tr><td colspan="2">'Negligible potential' for roosting bats</td></tr>
</table>

3.19 No evidence of bats was recorded, and the building was assessed and was deemed to hold 'negligible potential' for roosting bats in line with the BCT Guidelines (Collins, 2023). This was due to a lack of potential bat exit/entry points and potential roosting areas around the building.

3.20 On this basis, it is considered that bats are likely absent from the building and therefore roosting bats are not considered likely to be impacted by the proposed works.

3.21 No further surveys or licensing requirements are recommended, however, further information regarding the validity of this report and what to do in the unlikely event a bat is unexpectedly found is provided in Section 4 of this report.

Roosting bats - trees

3.22 The tree on-site to be impacted by the development is not considered to hold the potential for roosting bats due to its smaller size and/or lack of Potential Roosting Features (PRFs). Therefore, impacts on roosting bats are not anticipated, and roosting bats in trees are not discussed further in this assessment.

Foraging and commuting bats - Artificial Lighting at Night (ALAN)

3.23 It is possible that bats are commuting and foraging within the local area. Bats are very sensitive to artificial lighting, which can impede their ability to successfully forage and can alter flightpaths (BCT & ILP, 2023). As bats may be using the property during nocturnal hours, it is essential that any new lighting is designed to minimise impacts on foraging bats, particularly around areas with mature vegetation such as trees and hedges. Light spill can extend beyond the site boundary and may therefore also impact bats using neighbouring land.

Bat SAC Consultation Zone

3.24 The site falls within the Bath and Bradford-on-Avon (BoA) Bat SAC consultation zone (WSBRC, 2025); the site is situated within a highly urban setting with industrial land surrounding the site. There is a treeline running along Quartermaster Road to the north; however, a road is present here with street lighting and is therefore unlikely to be utilized by the bats associated with the SAC.

3.25 An area of woodland is present approximately 180m southeast, however, this is considered to be at a sufficient distance from the development site that artificial lighting would not have an impact on bats potentially using the woodland.

3.26 Therefore, no impacts on the Bath and BoA Bat SAC are anticipated as part of the application and no further action is advised in relation to the development.

3.27 Specifications for new lighting designed to reduce impacts on bats are detailed in Section 5.

Dormice

3.28 The habitats on-site are considered to provide very limited habitat for dormice. No dormouse records exist within the local area (WSBRC, 2025) and the nearest European Protected Species (EPS) licence is located approximately 11.5km southeast of the site (MAGIC, 2025).

3.29 Due to a lack of records, suitable habitat on-site and lack of connectivity to the wider landscape, dormice are not considered to be affected by the proposed works and no mitigation is advised for this species.

Great Crested Newts (GCN)

3.30 There are 18 GCN records within 1km of the site (WSBRC, 2025); and the nearest positive EPS licence return is located approximately 2.6km north of the site (MAGIC, 2025).

GCN Risk Zone – District Level Licence (DLL) scheme

3.31 The site falls within a 'Green Risk Zone' for GCN (Natural England, 2025c); therefore, there is considered to be a low probability of GCN occupying the local area and the site.

Aquatic habitats

3.32 No waterbodies are present on-site, and an aerial assessment revealed two waterbodies within 250m of the site (MAGIC, 2025). No access was possible to these ponds during the site visit.

Terrestrial habitats

3.33 The site holds inadequate habitat for GCN on-site consisting almost exclusively of hard standing.

3.34 Based upon the lack of suitable habitat on-site, GCN are not considered to be present on-site, and this species is not discussed further in this assessment.

Hedgehogs

3.35 13 hedgehog records are present within the local area, the closest record is situated 450m east of the site (WSBRC, 2025). The site possesses minimal foraging habitat for hedgehogs, but it is possible that hedgehogs commute across the site. Hedgehogs are a priority species under Section 41 of the NERC Act 2006 due to their historical population decline (Wembridge *et al,* 2022), therefore, mitigation for hedgehogs is provided in Section 5 of this report.

Reptiles and common amphibians (herpetofauna)

3.36 The site provides very limited habitat for reptiles and common amphibians (herpetofauna), consisting almost exclusively of hard standing. There are several reptile and common amphibian species identified in the data search (WSBRC, 2025), with the closest being slow-worm *Anguis fragilis* 540m northeast of the site. However, this record is buffered from the site by developed land.

3.37 For these reasons, reptiles and common amphibians are considered highly unlikely to be impacted by the proposed development and these species are not considered further in this assessment.

4. BIODIVERSITY NET GAIN (BNG) CALCULATION

DEFRA Biodiversity Metric calculation

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

Baseline habitats

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

Relevant date for baseline of the site

4.3 The relevant date for the baseline of the site is taken to be the date of the survey 24th September 2025 as no site clearance is believed to have been undertaken prior to the site visit.

Baseline habitats present on-site

4.4 Baseline habitats present within the site are listed in Table 11 below:

Table 11: Baseline habitats present on-site

Habitat type	Habitat parcel reference	Area	Habitat condition	Habitat units
Area habitats				
Developed land; sealed surface	BA-A	0.6712ha	n/a	0.00
Bramble scrub	BA-B	0.0005ha	n/a	0.00
Urban tree	T007	0.0366ha	Good	0.44
			Total units =	**0.44 units**
Hedgerow habitats				
n/a	n/a	n/a	n/a	n/a
			Total units =	**n/a**
Watercourse habitats				
n/a	n/a	n/a	n/a	n/a
			Total units =	**n/a**

Proposed habitats

4.5 A proposed (post-development) habitats plan is provided in Appendix D; proposed habitats are presented in Table 12 below:

Table 12: Proposed habitats on-site

Habitat type	Habitat parcel reference	Area	Proposed habitat condition	Criteria targeted	Habitat units
Area habitats					
Developed land; sealed surface	PR-A	0.1503ha	n/a	n/a	0.00
				Total units projected =	**0 units**
Hedgerow habitats					
n/a	n/a	n/a	n/a	n/a	n/a
				Total units projected =	**n/a**
Watercourse habitats					
n/a	n/a	n/a	n/a	n/a	n/a
				Total units projected =	**n/a**

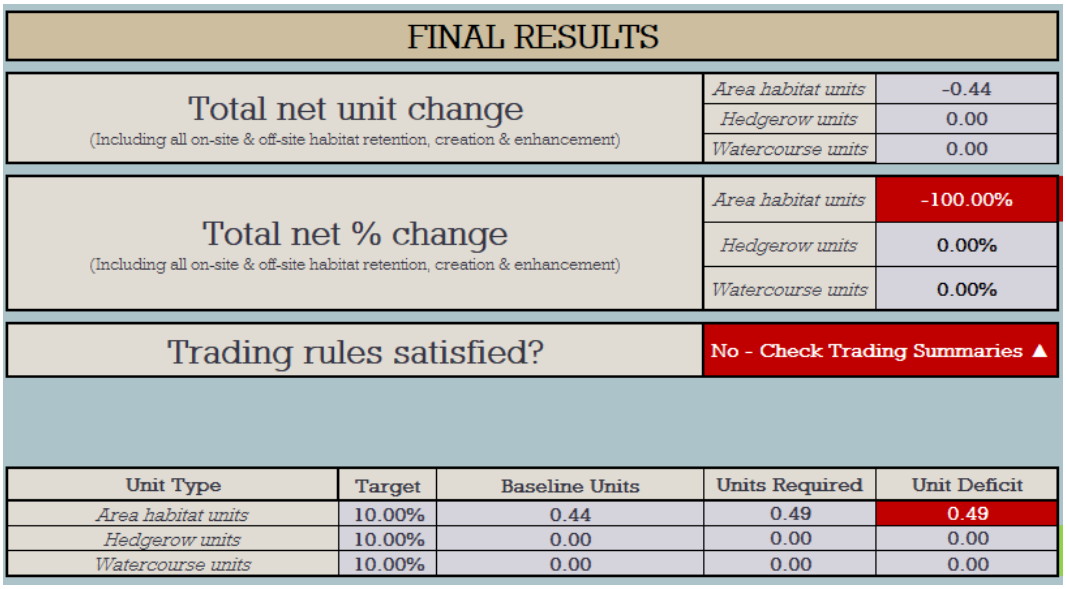
Justification for strategic significance of proposed habitats

4.6 A search was undertaken on the Wiltshire & Swindon Local Nature Recovery Strategy map (Wiltshire Council, Swindon Borough Council & Natural England 2025b) and draft consultation strategy document (Wiltshire Council, Swindon Borough Council & Natural England (2025a). The site does not fall within a strategic location and no 'potential activities' were noted on-site. As all proposed habitats will form part of a commercial development and have no biodiversity value, a low strategic significance was assigned to all habitats.

Headline results

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

Figure 1: DEFRA Statutory Biodiversity Metric headline results



FINAL RESULTS

Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Area habitat units*	-0.44
	Hedgerow units	0.00
	Watercourse units	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Area habitat units*	-100.00%
	Hedgerow units	0.00%
	Watercourse units	0.00%
Trading rules satisfied?		No - Check Trading Summaries ▲

Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Area habitat units	10.00%	0.44	0.49	0.49
Hedgerow units	10.00%	0.00	0.00	0.00
Watercourse units	10.00%	0.00	0.00	0.00

Interpretation of results

4.8 Based upon the current proposals, there is anticipated to be an overall net loss of -0.44 in habitat units post-development; this is equivalent to a net % change of -100% in habitat units post-development.

4.9 The unit shortfall summary is presented in Figure 2 below which indicates the shortfall required to achieve the mandatory 10% net gain in habitat (A1) units:

Figure 2: DEFRA Statutory Biodiversity Metric unit shortfall summary

Tier	Unit Shortfall by Tier	Credits Required
A1	0.49	0.97 ▲
A2	0.00	0.00
A3	0.00	0.00
A4	0.00	0.00
A5	0.00	0.00
H	0.00	0.00
W	0.00	0.00

4.10 The applicant owns no suitable alternative land for to provide the required off-site habitats and there is no available area to accommodate additional habitats on-site due to the industrial nature of the development.

4.11 A 10% net gain cannot be achieved on-site for habitats; therefore, off-site habitat units and/or statutory biodiversity credits will now need to be purchased by the applicant. Further information is provided in Section 5 below.

5. BIODIVERSITY MITIGATION AND ENHANCEMENT PLAN

Biodiversity Net Gain (BNG) – habitat gains/losses

5.1 Based upon the current proposals, there is anticipated to be an overall net loss of -0.44 in habitat units post-development; this is equivalent to a net % change of -100% in habitat units post-development.

5.2 As the mandatory minimum 10% net gain cannot be achieved on-site for habitat units, the applicant will need to secure either off-site habitat units or statutory biodiversity credits, or a combination of both.

Requirements to discharge the biodiversity gain condition of planning permission

5.3 The applicant must now purchase habitat units from a local off-site provider or as a last resort purchase statutory biodiversity credits from Natural England to meet the mandatory minimum 10% net gain requirements for habitats units as required under the Environment Act 2021.

5.4 The applicant should note that the Spatial Risk Multiplier (SRM) has already been applied to the unit shortfall summary (Section 4 – Figure 2, column 3) and so this represents the number of units needed to be purchased if purchasing statutory biodiversity credits (x 2 multiplier applied).

5.5 Both options have been explained below:

<u>Off-site habitat units</u>

5.6 Should off-site habitat units be purchased through an off-site provider, an appropriate SRM will be applied depending on where the units are allocated (x 1 for units located within the LPA or National Character Area (NCA) boundary, therefore half of the above units; x 1.5 for units within a neighbouring LPA / NCA boundary, and x 2 if the units are not located within LPA/NCA or neighbouring LPA/NCA boundaries).

5.7 The development is anticipated to result in a percentage net loss of -100% in habitat units. Off-site habitat units or statutory biodiversity credits will need to be pursued. For statutory biodiversity credits, 0.97 units (Spatial Risk Multiplier (SRM) applied) of 'A1' medium distinctiveness habitats will be required to provide the 10% net gain. A Biodiversity Gain Plan must be submitted to and approved by the Local Authority to discharge biodiversity net gain as a condition of planning permission.

5.8 It should therefore be noted that purchasing off-site habitat units will always be the preferred option, and the most economical option as statutory credits are priced above the local market rate.

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

https://gaiacompany.io/

https://environmentbank.com/

Statutory biodiversity credits

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

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

Discharge of biodiversity gain as a condition of planning permission

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

Invasive non-native species (INNS)

5.12 Himalayan cotoneaster was recorded (Appendix D – Target note 1) within the bramble scrub and is listed under Schedule 9 of The Wildlife and Countryside Act (1981) (as amended). This species will need to be removed or controlled to prevent any further spread, as this species can outcompete local biodiversity in the long-term. This must be complied within the confines of the Wildlife and Countryside Act (1981) (as amended), which makes it an offence to allow this species to spread into the wild. The following methods will be used to remove this species from site:

- **Herbicides:** The upper foliage of the plants should be cut back to a stump and holes drilled into the stems. A suitable herbicide may then be applied to the 'drilled wells' in the cut stumps (may require multiple applications) with all arisings being cut, burned, chipped or mulched.
- **Manual cutting and digging:** Top growth is manually removed, and the root system dug out. The resulting cut woody material and stumps can be removed to a safe area for burning or chipped on site.

5.13 For either of the above methods, all foliage should be removed from site as soon as possible to reduce the likelihood of germination.

Bats

Roosting bats

5.14 The PRA of Spectra Commercial Vehicle Repairs industrial workshop was undertaken, and the building and tree to be impacted were assessed to be of 'negligible potential' for roosting bats. Roosting bats are not considered to be impacted as part of the proposed works and therefore no further action is recommended in relation to bats roosting in buildings/trees.

5.15 The PRA survey only provides a 'snapshot' in time and does not account for seasonal variation; bats may have been overlooked due to seasonal constraints. Bats are a highly mobile species and as such, it is not possible to have complete certainty that bats are not present, rather, that there was no indication of bats at the time of survey.

5.16 The surveys can only be considered valid for 12-18 months from the survey dates in accordance with the CIEEM Advice Note (CIEEM, 2019). The 12-18-month period is considered acceptable where the conditions of the buildings/trees on site remain unchanged since the survey and the proposals for the site are unchanged. If any changes to the plans occur, or if 12-18 months pass and no works have been undertaken, this report and any conclusions provided will not be valid. In this event, it is the responsibility of the applicant to contact ABR Ecology to determine whether an amended report or resurvey of the site is required.

5.17 **In the unlikely event bat(s) are encountered at any stage, work must cease immediately, and Natural England or a suitably qualified bat ecologist must be sought for advice by the applicant/landowner.** The applicant must be aware of

the severe penalties associated with bat crimes and their legal obligation to report this information.

5.18 In the event a bat is unexpectedly discovered, the nature of the advice will concern allowing the bat(s) to leave of their own accord or waiting for a licensed person to remove the bat(s). A bat licence may then be deemed necessary following the necessary survey work. **All persons including contractors are explicitly forbidden from handling bats or interfering with bats in any way.**

Foraging and commuting bats – Artificial Lighting at Night (ALAN)

5.19 The site potentially supports commuting and foraging bats. The following specifications for lighting must be adhered to and are based upon the 'Bats and Artificial Lighting At Night' Guidance Note BN08/23 (BCT & ILP, 2023):

- Preferably, no net increase in external light fixtures will be installed. If external lighting is required, this will be limited and only installed where required for safety purposes. Light fixtures will only be installed at doorways/at the site entrance etc to allow for visibility.
- All luminaires installed will lack UV elements when manufactured. Metal halide, compact fluorescent sources will not be used.
- LED luminaires only will be used due to their sharp cut-off, lower intensity, good colour rendition and dimming capability.
- A warm white light source (2700Kelvin or lower) will be adopted to reduce blue light component.
- Light sources will feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats (Stone, 2012).

Hedgehogs

5.20 13 hedgehog records are present within the local area, the closest record being 450m east of the site (WSBRC, 2025). The site possesses minimal foraging habitat for hedgehogs, but it is possible that hedgehogs commute across the site

5.21 The following measures will be followed to ensure they are protected during works and to ensure habitat connectivity is maintained:

- Any new close-boarded fencing and boundaries proposed will feature a minimum of one hedgehog highway (130mm x 130mm hole) along every boundary to ensure habitat connectivity for hedgehogs; this can comprise either

a specialised hedgehog highway gravel board (https://www.garden-fence-panels.co.uk/concrete-posts-bases/concrete-gravel-boards/hedgehog-friendly-concrete-base-panel-plain/) or if timber gravel boards are used a custom-made hole.

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

- Materials must be stored on pallets raised off the ground and away from surrounding vegetation to discourage hedgehogs from taking refuge within them.

Nesting birds

5.22 There is potential for nesting birds to be present within the bramble scrub and the tree being removed. Therefore, the following mitigation will apply for works:

- Any vegetation clearance should take place between the start of September and the end of January when birds are least likely to be nesting. However, it must be noted that some species, such as wood pigeons (*Columba palumbus*), nest all year round and so works should proceed with caution during this time.

- Where this is not possible and works take place between the start of February and end of August, a pre-works check for nesting birds must be undertaken by a suitably experienced ecologist. If an active nest is encountered, all works must cease immediately, and the nest must be left undisturbed. The ecologist will establish a works exclusion zone around the nest, and this will be marked out with hazard tape and signage put up; a second site visit by the ecologist to check nest occupation will be required before works can continue in this area. Works may only continue when the nest is deemed to be unoccupied/no longer active by the ecologist. A camera to monitor nesting activity may be necessary.

- **If a bird's nest is encountered at any other unsupervised time, all works in the area must cease immediately the ecologist must be contacted immediately to provide further advice.**

Biodiversity enhancements

5.23 The following enhancements will be included as part of the development to ensure compliance with national and local planning policy (see Appendix G for locations and designs):

- A ‘bug hotel’ (https://www.nhbs.com/bug-mansion) or similar approved will be installed on a tree in the northwest of the site.
- One ‘Vivara Pro Seville WoodStone® Nest Box with 32mm Oval Hole’ (https://www.nhbs.com/vivara-pro-seville-32mm-oval-woodstone-nest-box) or similar approved will be installed on a tree in the northeast of the wider site.

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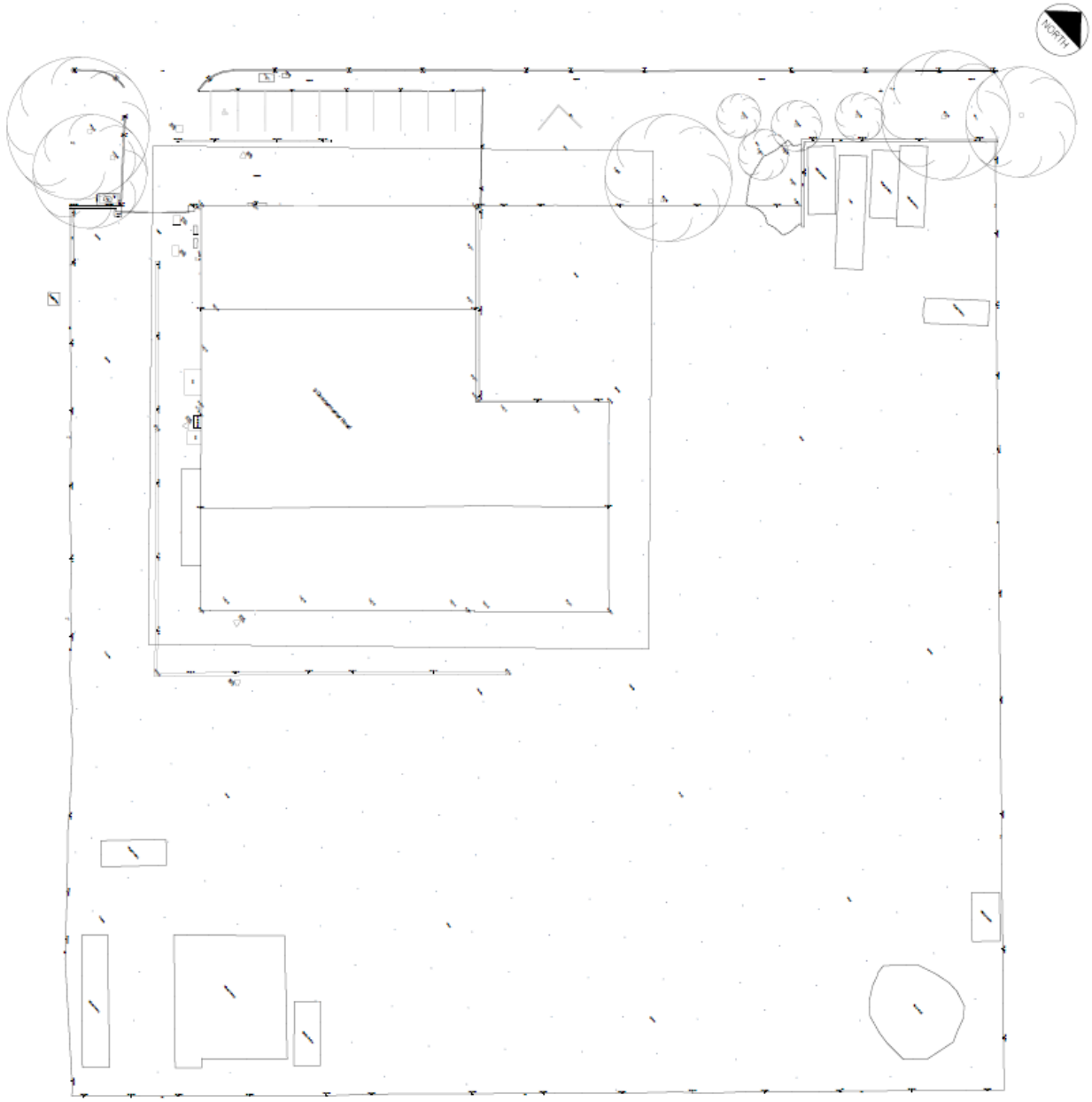
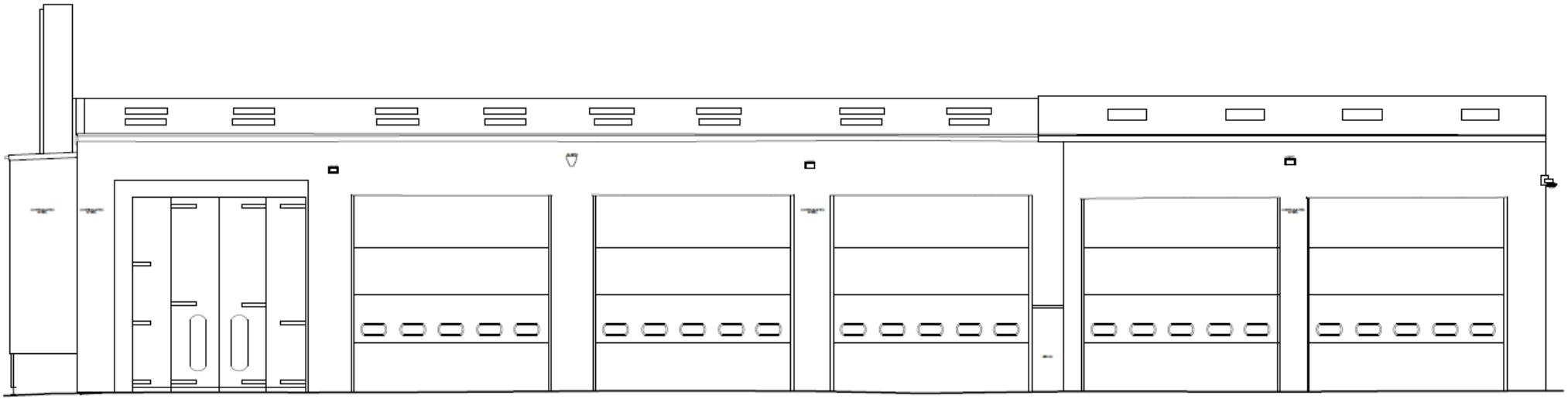
Appendix A – Site location and existing plans





Existing SE Facing Elevation
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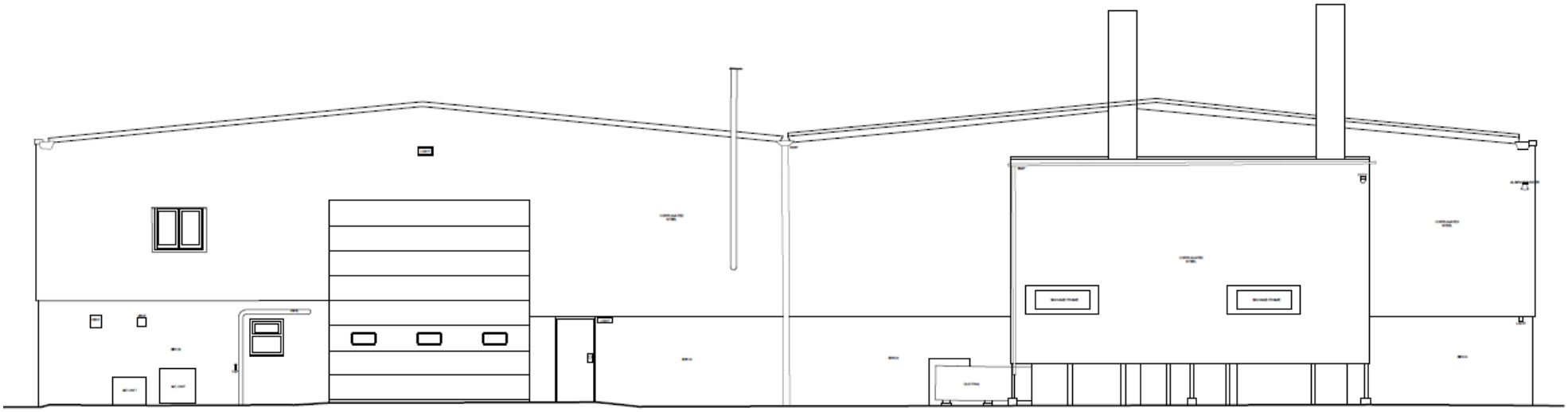

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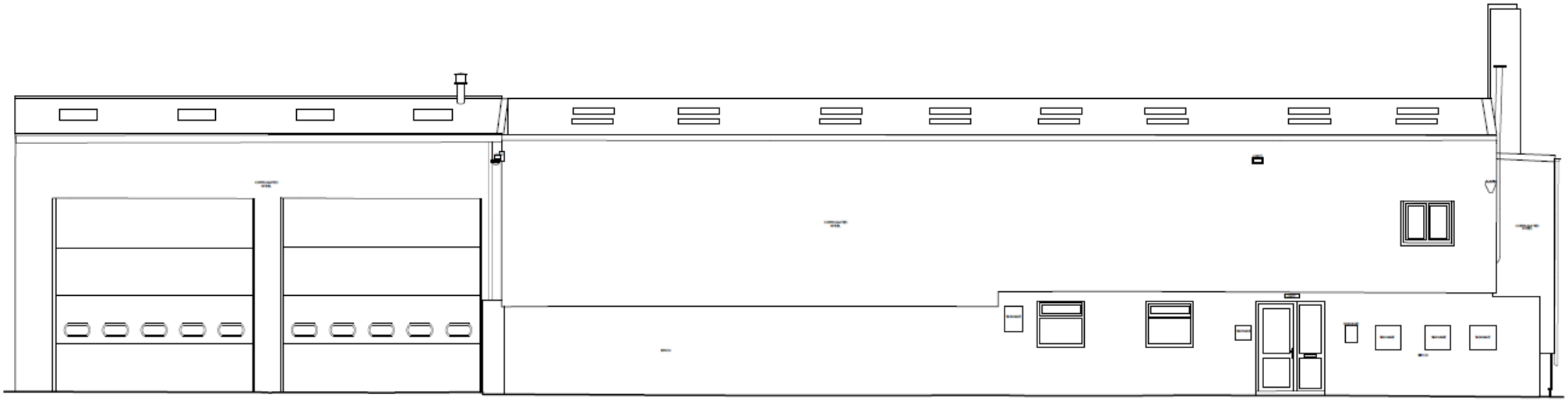

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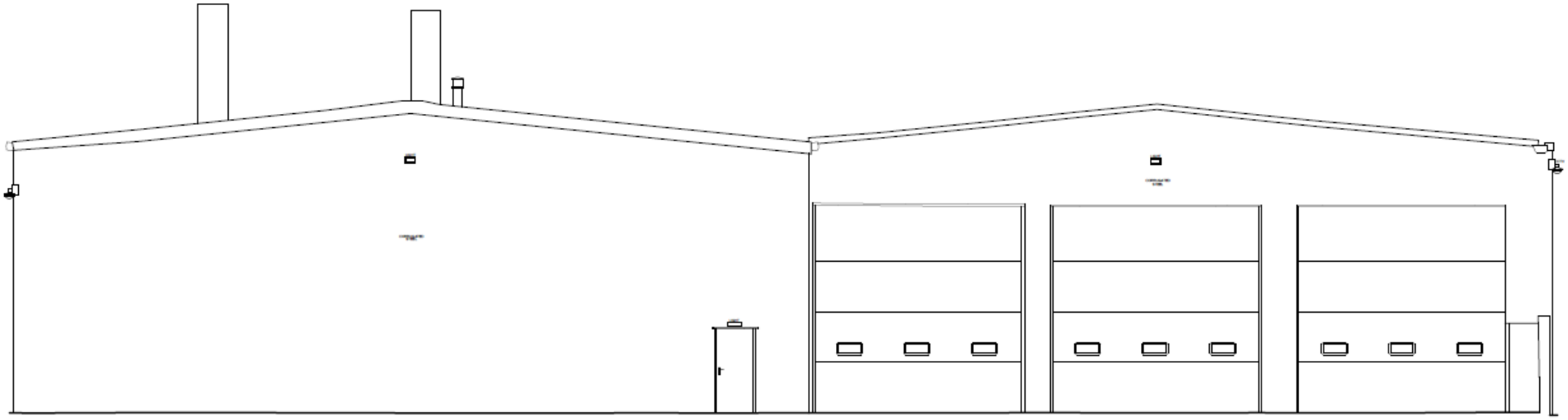

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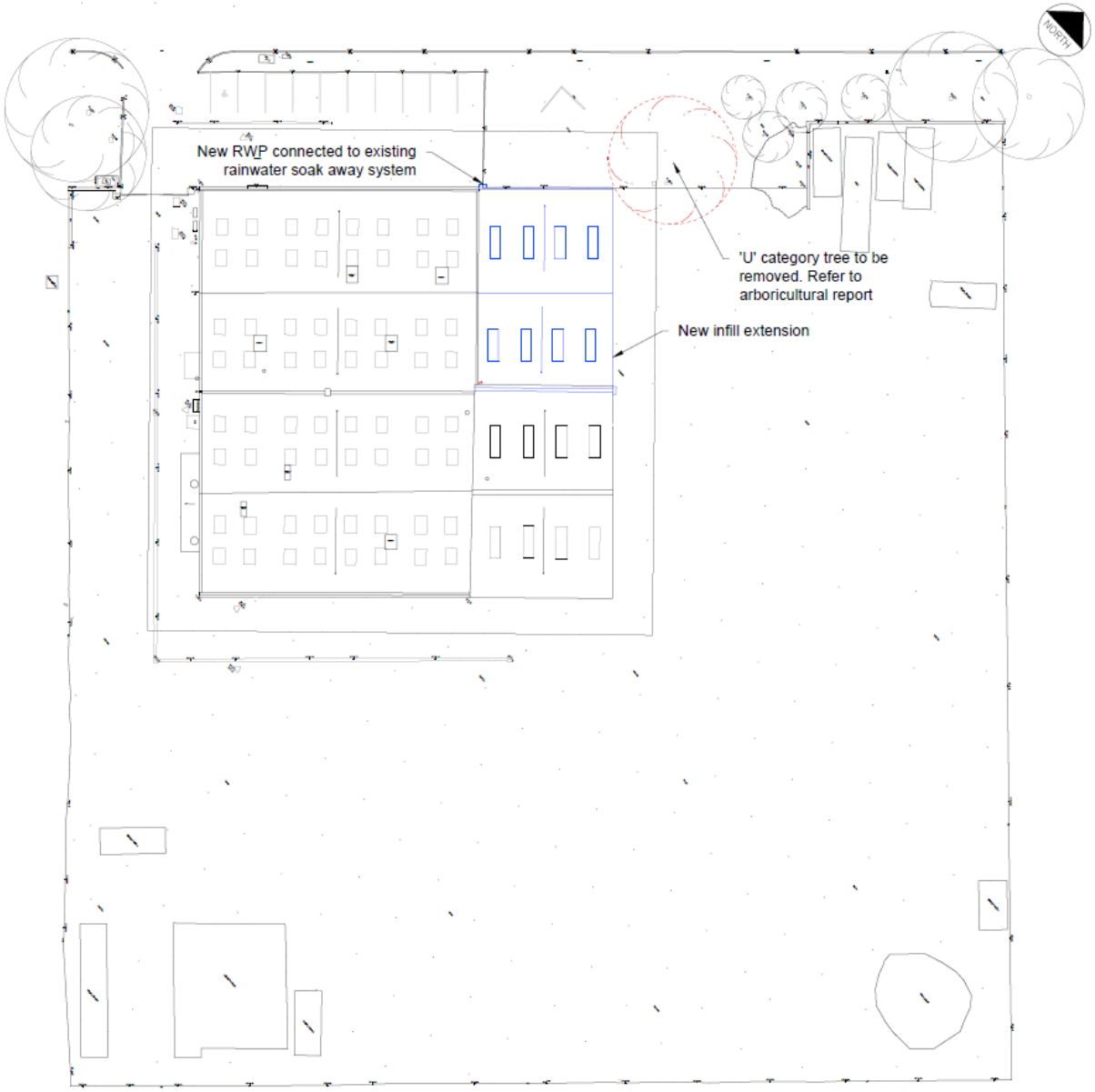
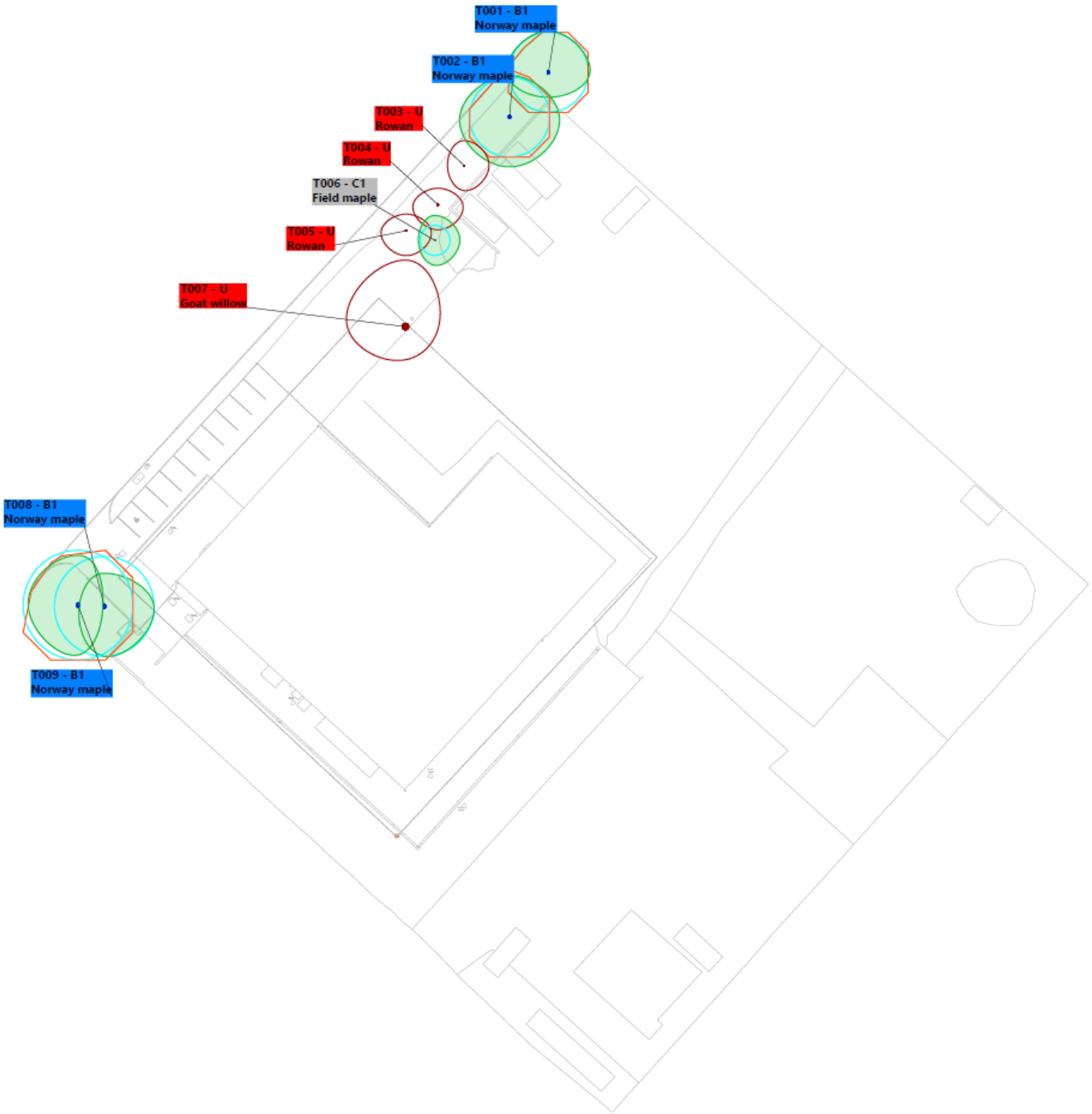
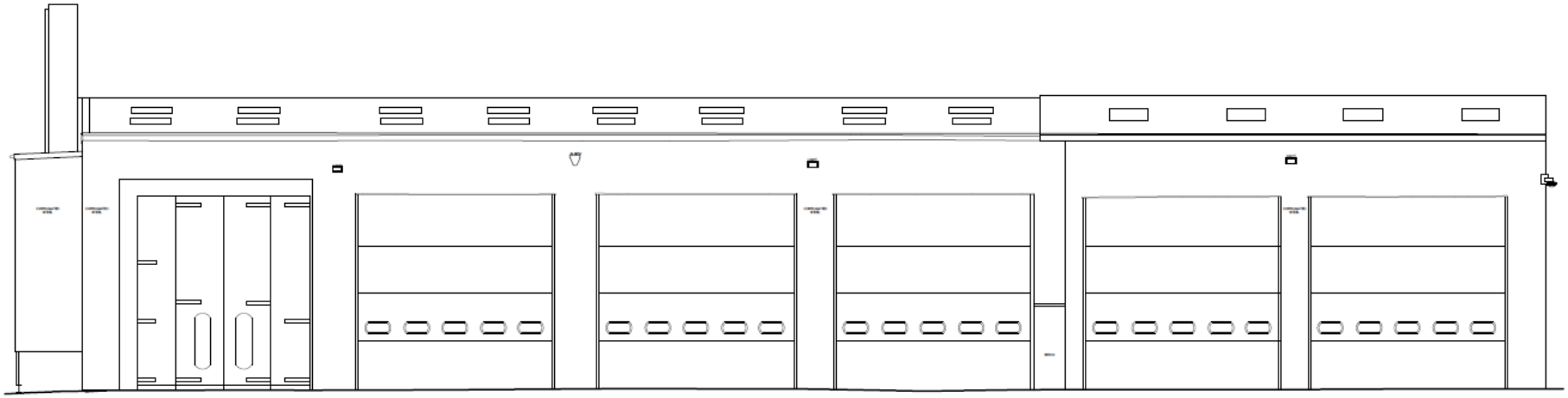
Appendix B – Proposed site plan, tree protection plan and proposed elevations



Proposed Site Plan
Scale 1:200 @ A1


T001 - B1
Norway maple
T002 - B1
Norway maple
T003 - U
Rowan
T004 - U
Rowan
T006 - C1
Field maple
T005 - U
Rowan
T007 - U
Goat willow
T008 - B1
Norway maple
T009 - B1
Norway maple



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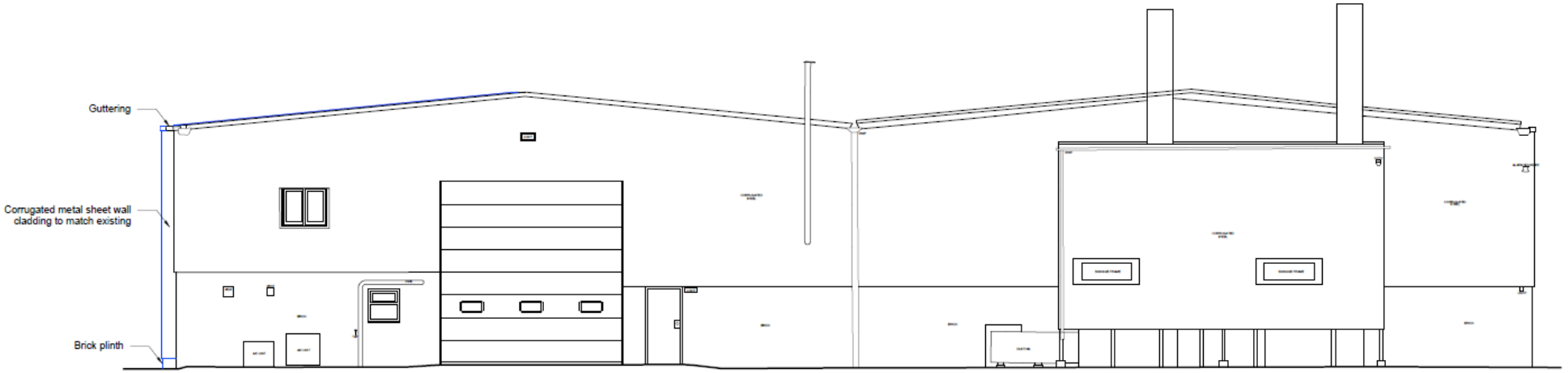

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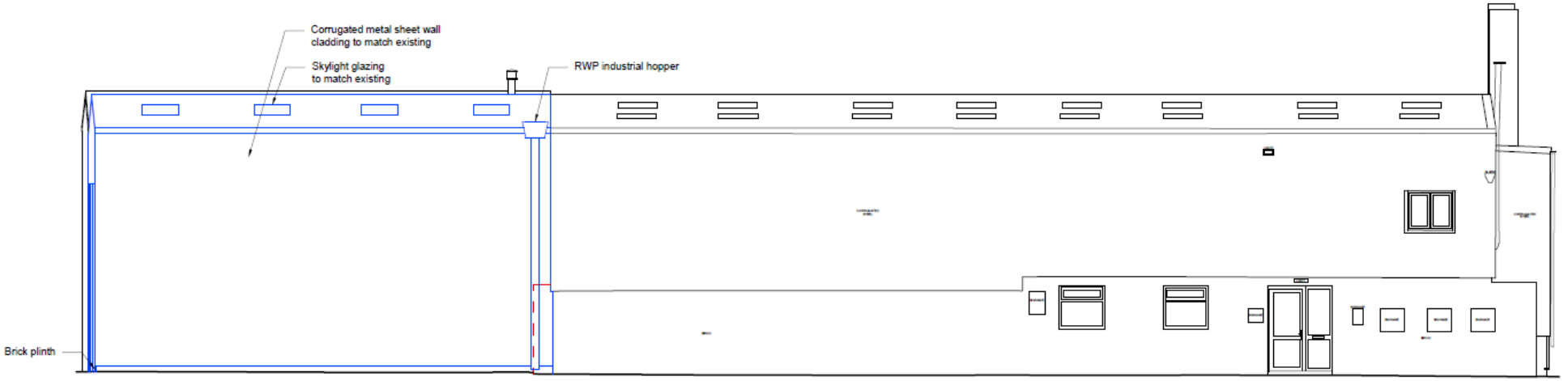

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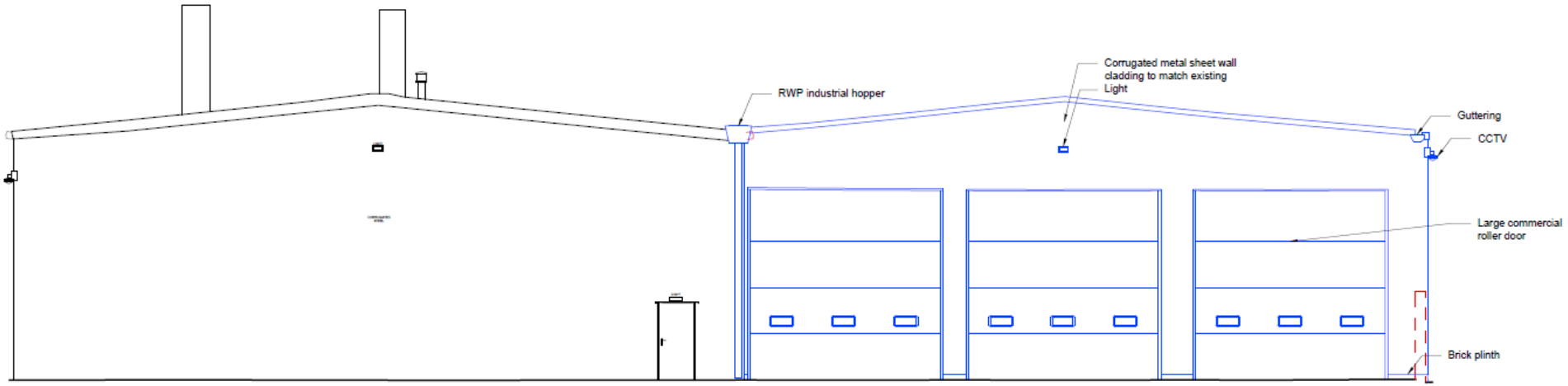

Proposed NE Facing Elevation
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Appendix C – Relevant legislation and planning policy

Legislation and UK BAP priority habitats/species

Legislation

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

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

The above named species and adders (*Vipera berus*), slow worms (*Anguis fragilis*), grass snakes (*Natrix natrix*), common lizards (*Zootoca vivipara*), common frog (*Rana temporaria*), palmate newt (*Lissotriton helveticus*), smooth newt (*Lissotriton vulgaris*), water voles (*Arvicola amphibius*) and several invertebrate species are also protected under Schedule 5 of the Wildlife and Countryside Act (WCA) (1981) (as amended). Schedule 9 of the WCA (1981) includes non-native, invasive species including (but not limited to) Himalayan balsam (*Impatiens glandulifera*) and signal crayfish (*Pacifastacus leniusculus*). Badgers (*Meles meles*) are legally protected under The Protection of Badgers Act (1992).

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

A number of sites designated for nature conservation are afforded legal protection due to being of European importance. These include Special Areas of Conservation (SACs) (protected under the EC Habitats and Species Directive (1992), Special Protection Areas (SPAs) for birds (protected under the EC Birds Directive) and Ramsar (Ramsar Convention, 1975). Other protected sites include Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNRs) Local Nature Reserves (LNRs) and Protected Road Verges which are designated under the WCA (1981) and strengthened by The Natural Environment and Rural Communities Act (NERC) (2006).

SPAs and SACs were previously included in the Natura 2000 sites and following amendments to the legislation, are now included under the 'National Site Network'. Ramsar sites do not form

part of the 'National Site Network' however, are afforded the same protection. These changes allow the Government to continue commitment to the international commitments under the Bern Convention, the Oslo and Paris Conventions (OSPAR), Bonn and Ramsar Conventions.

Following a consultation in 2019, the Government announced that it would mandate Biodiversity Net Gain (BNG) for developments in England to reverse the widespread loss of biodiversity. The Town & Country Planning Act 1990 will be amended and the Environment Bill received Royal Assent on 9th November 2021; this legislation was enacted into UK law on 2nd April 2024 for small sites.

Schedule 14 Parts 1 and 2 of The Environment Act 2021 concerns BNG as a condition of planning permission.

The National Planning Policy Framework (NPPF) (Department for Levelling Up, Housing & Communities, 2024) sets out requirements for the delivery of Biodiversity Net Gain (BNG), and this is supported within Planning Practice Guidance (PPG) (updated July 2019). The Natural Environment PPG addresses principles targeting biodiversity conservation, including individual site and species protection through to supporting ecosystem services, and the use of Ecological Networks to support the national Nature Recovery Network. In particular, the PPG promotes the delivery of measurable BNG through the creation and enhancement of habitats alongside development.

UK BAP priority species and habitats

Several species and habitats are listed under the UK Biodiversity Action Plan (UK BAP) (JNCC, 2016) as priority habitats/species due to their vulnerability or rarity as listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006) and Section 40 places a duty on all public authorities to conserve biodiversity. These are known as habitats / species of 'principal importance' under Section 41 of the NERC Act (2006).

These include several terrestrial and freshwater habitats, including some hedgerows and streams, and several species such as hedgehogs (*Erinaceus europaeus*), barbastelle, Bechstein's bat, both species of horseshoe bat, brown long-eared bat (*Plecotus auritus*), soprano pipistrelle (*Pipistrellus pygmaeus*), noctule (*Nyctalus noctula*), water voles, white-clawed crayfish and otter.

National and local planning policy

NPPF – The National Planning Policy Framework

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

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

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

To ensure this application is compliant with Section 15 of NPPF, habitat enhancements will be required to demonstrate a biodiversity net gain as an outcome of the development.

Section 15 of NPPF also gives consideration to sites with potential to impact on irreplaceable habitats, and states:

'*Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists*.'

To ensure this application is compliant with Section 15, this application should be accompanied by a suitable arboricultural report to assess the presence of potential ancient or veteran trees.

Wiltshire Core Strategy

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

Core Policy 50: Biodiversity and Geodiversity

Protection

Development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term. Where it has been demonstrated that such features cannot be retained, removal or damage shall only be acceptable in circumstances

where the anticipated ecological impacts have been mitigated as far as possible and appropriate compensatory measures can be secured to ensure no net loss of the local biodiversity resource, and secure the integrity of local ecological networks and provision of ecosystem services.

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

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

Biodiversity enhancement

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

Local sites

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

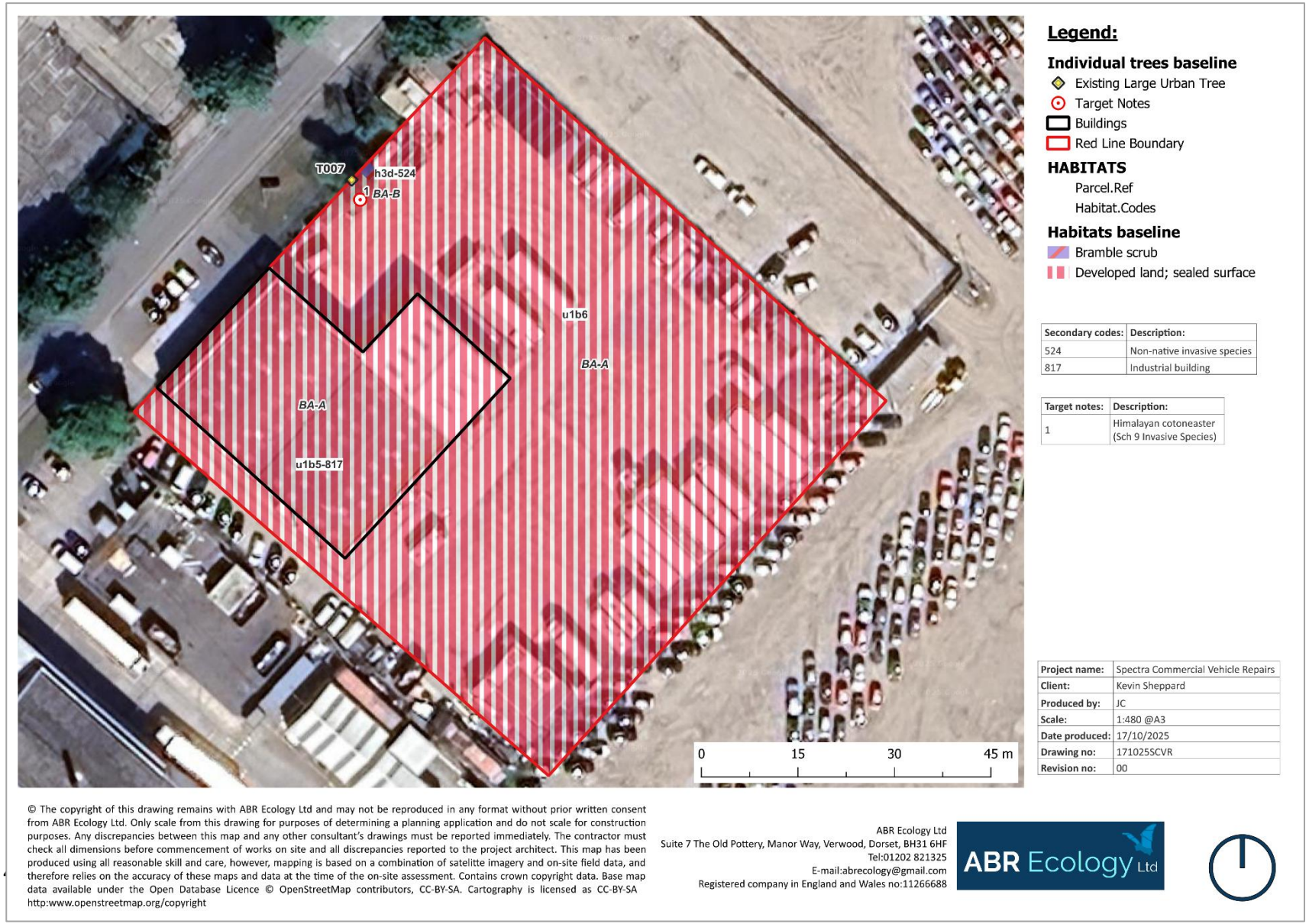
i. cannot reasonably be avoided
ii. are reduced as far as possible
iii. are outweighed by other planning considerations in the public interest
iv. where appropriate compensation measures can be secured through planning obligations or agreements.

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

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

Appendix D – Habitat maps and species lists

Baseline habitats plan



Species list

Common name	Taxonomic name	DAFOR scale abundance
Developed land; sealed surface (u1b6) (BA-A):		
Black grass	*Alopecurus myosuroides*	Occasional
Bramble	*Rubus fruticosus agg.*	Frequent
Bristly ox-tongue	*Helminthotheca echioides*	Occasional
Broad-leaved dock	*Rumex obtusifolius*	Frequent
Common nettle	*Urtica dioica*	Abundant
Creeping bent	*Agrostis stolonifera*	Frequent
Dandelion sp.	*Taraxacum agg.*	Occasional
Dog-rose	*Rosa canina*	Rare
Groundsel	*Senecio vulgaris*	Occasional
Herb Robert	*Geranium robertianum*	Occasional
Ivy	*Hedera sp.*	Abundant
Knotgrass sp.	*Polygonum spp.*	Locally abundant
Redshank	*Persicaria maculosa*	Locally frequent
Smooth sow-thistle	*Sonchus oleraceus*	Occasional
White bryony	*Bryonia dioica*	Occasional
Woody nightshade	*Solanum dulcamara*	Rare
Bramble scrub (h3d 524) (BA-B):		
Bramble	*Rubus fruticosus agg.*	Dominant
Canadian fleabane	*Erigeron canadensis*	Occasional
Creeping bent	*Agrostis stolonifera*	Frequent
Hemp agrimony	*Eupatorium cannabinum*	Rare
Himalayan Cotoneaster (Sch 9)	*Cotoneaster simonsii*	Rare
Ivy	*Hedera sp.*	Frequent

Post-development habitats plan

Legend:

- Buildings
- Red Line Boundary

Individual trees Proposed

- Lost Tree

HABITATS

- Parcel.Ref
- Habitat.Codes

Habitats Proposed

- Developed land; sealed surface

Habitat parcel	Habitat
BA-A	Developed land; sealed surface being retained
PR-A	Proposed Developed land; sealed surface atop of Developed land; sealed surface
PR-B	Bramble scrub replaced with Developed land; sealed surface

Project name:	Spectra Commercial Vehicle Repairs
Client:	Kevin Sheppard
Produced by:	JC
Scale:	1:480 @A3
Date produced:	17/10/2025
Drawing no:	171025SCVR
Revision no:	00

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ABR Ecology Ltd

Appendix E – Photographs

Photo 1: Area of proposed works.

Photo 2: Top: Eastern elevation of industrial building. Bottom: Wider area of hardstanding on eastern side of site.

Photo 3: Internal of existing warehouse.

Photo 4: Goat willow to be removed as a result of the development.

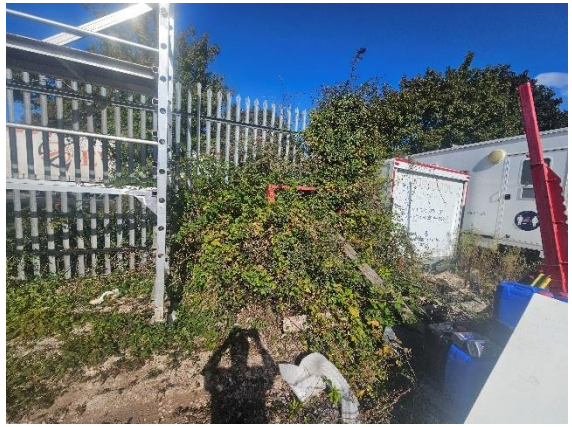


Photo 5: A small section of bramble scrub to be lost due to the proposed works.

Photo 6: Himalayan cotoneaster (Schedule 9 Invasive non-native species).

Appendix F – Habitat Condition Assessments

Condition Sheet: INDIVIDUAL TREES Habitat Type			
Habitat Types:			
Individual trees – Urban trees **Individual trees – Rural trees** Complete a condition sheet for each tree or block of trees. ***Please see the separate Line of trees condition sheet for a line of rural trees. You should only use the Line of trees condition assessment and record that habitat type in rural locations.***			
Individual trees (description applied to the urban or rural environment): Young trees over 7.5 cm in diameter at breast height whose canopies are not touching. **Urban Perimeter / Linear Blocks and Groups (description applied to the urban environment only):** Groups or stands of trees (size requirement as defined above) within and around the perimeter of urban land. This includes those along urban streets, highways, railways and canals, and also former field boundary trees incorporated into developments. Canopies should predominantly overlap continuously. Groups of urban trees that don't match the descriptions for woodland may be assessed within this category.			
On-site or off-site, site name and location:	On-site	**Survey date and surveyor name:**	Phil Smith ACIEEM and Jonathan Cornish – 24th September 2025
Central grid reference of habitat:	ST 85823 52831	**Habitat parcel reference:**	T007
Survey reference (if relating to a wider survey):	-	**Limitations (if applicable):**	

Condition Assessment Criteria		**Condition Achieved (Y/N)**	**Notes/Justification**
A	The tree is a native species (or at least 70% within the block are native species).	Y	Goat willow (*Salix caprea*) is a native species.
B	The tree canopy is predominantly continuous, with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide (individual trees automatically pass this criterion).	Y	Individual tree.
C	The tree is mature (or more than 50% within the block are mature)[1].	Y	The tree was deemed to be 'mature' based upon the arb report completed.
D	There is little or no evidence of an adverse impact on tree health by human activities (such as vandalism, herbicide or detrimental agricultural activity). And there is no current regular pruning regime, so the trees retain >75% of expected canopy for their age range and height.	N	Arb report states '*Pruning history - reduced in the past with new regrowth forming at old pruning points'*. Evidence of pruning witnessed during in person site visit.
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	Y	Arb report states '*Main upright stem has dead bark on northern side*.' Evidence of deadwood present within tree on site visit. Fungal fruiting body present on western side. *Ganoderma adspersum* (Southern Bracket)

F	More than 20% of the tree canopy area is oversailing vegetation beneath.	Y	>50% of canopy oversailing grass.

Number of criteria passed:		**5**
Condition Assessment Result	**Condition Assessment Score**	**Score Achieved ×/✓**
Passes 5 or 6 criteria	Good (3)	✓
Passes 3 or 4 criteria	Moderate (2)	
Passes 2 or fewer criteria	Poor (1)	

Note that 'Fairly Good and Fairly Poor' condition categories are not available for this broad habitat type.

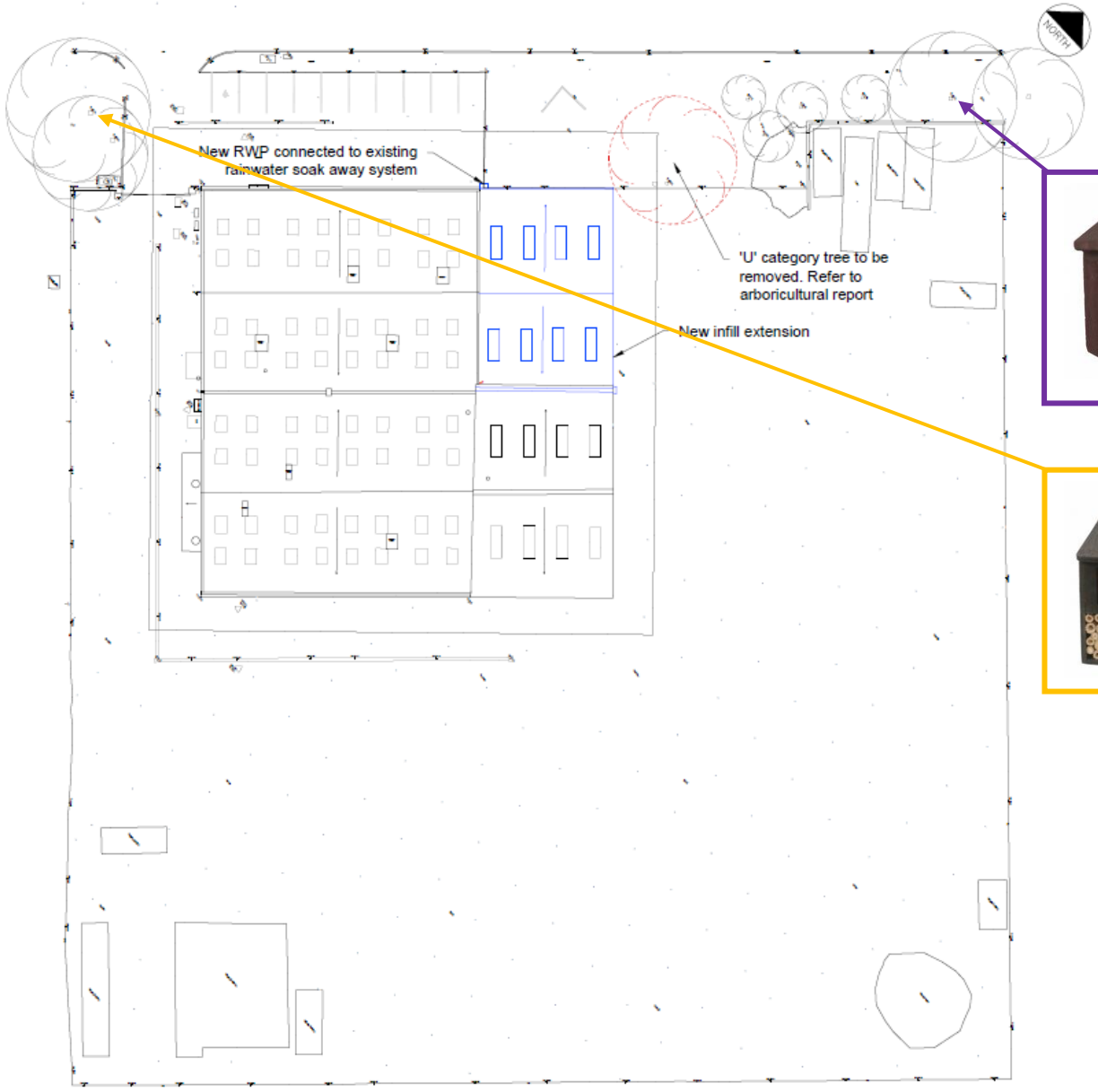
Suggested enhancement interventions to improve condition score[2]:

Footnotes:

Footnote 1 - See gov.uk standing advice on ancient and veteran trees. Available from:
Keepers of time: ancient and native woodland and trees policy in England (publishing.service.gov.uk)
and: Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK (www.gov.uk)

Footnote 2 - Enhancement of this habitat type is only possible by improving the habitat so that it meets all Criteria B, D and F. It is not possible or appropriate to enhance individual tree/s through meeting just one or two of those Criteria, nor by meeting Criteria A, C or E.

Appendix G – Biodiversity mitigation and enhancement plan



One 'Vivara Pro Seville WoodStone® Nest Box with 32mm Oval Hole' (https://www.nhbs.com/vivara-pro-seville-32mm-oval-woodstone-nest-box) or similar approved will be installed on a tree in the northeast of the site.

A 'bug hotel' (https://www.nhbs.com/bug-mansion) or similar approved will be installed on a tree in the northwest of the site.