

Ecology Report inc. Biodiversity Net Gain Assessment

DS Smith, Devizes

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1.0 Introduction

- 1.1 Nicholas Pearson Associates (NPA) has been instructed by DS Smith Packaging to undertake an ecology appraisal to inform a proposed new extension at their packaging facility off of Mill Road, Devizes, SN10 3EW (OS Grid Reference: SU 01329 60450) hereafter referred to as the 'Site'.
- 1.2 The Site is located to the south-east of Devizes and comprises an industrial warehouse with associated forecourt and car parking. The Site is set within an urban area and is immediately bordered by green space (sports pitches / a school) to the north, residential and commercial development to the east, and residential land to the south and west.
- 1.3 DS Smith Packaging are proposing to build a small (c. 300m²) extension along the east-facing elevation of the existing warehouse, which will including the re-configuration of footpaths and re-location of a bike shelter, as shown on the Site Plan as Proposed (Mark Lovell; 4558/PR/SP-OPT B).
- 1.4 To inform the above proposals, NPA undertook an extended habitat survey, a Biodiversity Net Gain (BNG) Assessment, and an assessment of the habitats on Site to support protected and priority species. To determine the potential of the warehouse for roosting bats, a Preliminary Roost Assessment (PRA) and aerial inspection was undertaken in November 2025.
- 1.5 This report sets out the results of the surveys and assessments above and identifies potential ecological constraints and opportunities in relation to the above proposals, including opportunities for biodiversity gains.

2.0 Legislation and Planning Policy

- 2.1 In carrying out this appraisal relevant legislation, planning policies, development plans and best practice guidelines were consulted.

Legislation

- 2.2 Species and habitats receive legal protection in the UK under various pieces of legislation, including:
 - The Conservation of Habitats and Species Regulation 2017 (as amended);
 - The Wildlife and Countryside Act (WCA) 1981 (as amended);
 - The Environment Act 2021;
 - The Countryside Rights of Way (CROW) Act 2000;
 - The Natural Environment and Rural Communities (NERC) Act 2006 (as amended);
 - National Planning Policy Framework 2024 (NPPF); and
 - The Protection of Badgers Act 1992.

Planning Policy

National Planning Policy Framework

- 2.3 The NPPF requires Local Planning Authorities to set out a strategic approach to make sufficient provision for “conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measure to address climate change mitigation and adaptation (Para 20)”. Section 15 of The NPPF includes guidance outlining that policies and decisions should contribute to and enhance the natural local environment by protecting and enhancing sites of biodiversity value, minimising impacts on and providing net gains for biodiversity, including 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. When determining planning applications “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 (para 193a)”; “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” (para 193c); and 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” (para 193d).
- 2.4 The Government Circular 06/2005, which is referred to by the NPPF, provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system.

Local Planning Policy

- 2.5 The Wiltshire Core Strategy (adopted January 2015) sets out the local planning policies which are relevant to the Site and strategic objective 5 sets out the core policies for ‘protecting and enhancing the natural, historic and built environment’.
- 2.6 The policies that relate to Nature Conservation include:
- Core Policy 50: Biodiversity and Geodiversity; and
 - Core Policy 52: Green Infrastructure.

3.0 Methodology

Extended Habitat Survey

- 3.1 A habitat survey of the Site was undertaken by an NPA ecologist on 06 November 2025. All habitats and features of ecological value/interest were mapped using the habitat types required for Biodiversity Net Gain¹, informed by Version 2.0 of the UK Habitat Classification system² at a minimum mapping scale (Minimum Mappable Unit or MMU) of 5m² (see Appendix 1 for photographs). The scope of the survey was extended to include an assessment of the Site to support protected species.

Biodiversity Net Gain Assessment

- 3.2 All habitats identified during the habitat survey were subject to a condition assessment in accordance with the Statutory Biodiversity Metric condition assessment methodology¹.
- 3.3 The Statutory Biodiversity Metric – Calculation Tool was used to calculate biodiversity metrics for the Site. The metric uses area and linear habitat features as a proxy measure to capture a quantitative value of the Site for biodiversity pre- and post-development. The calculation takes the area, distinctiveness, condition and spatial significance of the habitat features into account as well as the ease of habitat creation and time taken for habitats to mature.
- 3.4 The extent for the baseline and proposed habitat areas were determined using the Baseline Habitats Plan and the Site Plan as Proposed (Mark Lovell; 4558/PR/SP-OPT B) respectively.

Preliminary Roost Assessment of Structures

- 3.5 An internal and external inspection of the industrial warehouse was undertaken on the 06 November 2025 by an NPA ecologist and in accordance with Good Practice Guidelines³. See Appendix 1 for photographs of elevations/potential roosting features taken during the inspection.
- 3.6 The survey comprised a detailed inspection of the structure to search for features suitable for roosting bats, potential exit/entry points and sign of bats (e.g. droppings, feeding remains). The scope of the survey was limited to a small section of the east-facing elevation only (*i.e.* in close proximity to the proposed works).

¹ Statutory biodiversity metric tools and guides - GOV.UK. [Online] Available at: <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides>.

² UKHab (2023) *UK Habitat Classification Version 2.0* [Online]. Available at: <https://ukhab.org/> (Accessed: 05 December 2025).

³ Collins, J (2023) *Bat Surveys for Professional Ecologists: Good Practice Guidelines*. 4th Edition. London: The Bat Conservation Trust.

- 3.7 In order to gain more conclusive evidence and to more accurately assess the features suitability, all Potential Roost Features identified during the Preliminary Roost Assessment were subject to an aerial inspection by a licensed bat surveyor on the 27 November 2025, and in accordance with Good Practice Guidelines³. This survey comprised a detailed, elevated search (via MEWP) to inspect and endoscope features suitable for roosting bats.
- 3.8 The structure was then assigned a rating based on its potential to support roosting bats, as outlined below:
- Roost: Bats and/or evidence of bats recorded,
 - High: one or more potential roosting sites that are obviously suitable for use by larger numbers of bats,
 - Moderate: one or more potential roost sites, but unlikely to support a roost of high conservation status,
 - Low: includes one or more potential roost sites that could be used opportunistically by individual bats,
 - Negligible: no obvious habitat features on site likely to be used by roosting bats, but a small element of uncertainty remains, and
 - None: complete absence of habitat features on site likely to be used by any roosting bats.

4.0 Results

Habitats

- 4.1 The Site occupies an area of 0.1 hectares and comprised predominantly hard standing. Vegetated habitat on the Site is limited to areas of grassland and introduced shrub habitat. The Site comprises an area to the north-west (i.e. where the main development is proposed) and 2 No. areas to the south-east (i.e. where tree planting is proposed). Habitat descriptions should be read in conjunction with Figure 1: Baseline Habitats Plan.
- 4.2 The following UK Habitat Classifications were recorded during the survey:
- Developed land; sealed surface; and
 - Modified grassland
 - Introduced shrub

Developed land; sealed surface

- 4.3 The majority of the Site comprised an area of hard standing forming the existing forecourt and footpaths, and part of the Site extends into the warehouse (Appendix 1; Photo 1). Two structures; a smoking shelter and a bike shelter (Appendix 1; Photo 2) were also present.

Modified grassland

- 4.4 A small (c. 74m²) area of species-poor grassland habitat with 7 – 9 species per m² was present to the north-west of the Site (Appendix 1; Photos 3 – 5). Perennial Ryegrass *Lolium perenne*, Creeping Bent *Agrostis stolonifera*, and Red Fescue *Festuca rubra* were Frequent within the sward, with Meadow-grass *Poa sp.* and Cock's-foot *Dactylis glomerata* Occasional. White Clover *Trifolium repens* and Creeping Buttercup *Ranunculus repens* were Abundant within the sward and accounted for up to 40% cover of forbs in some localised areas. Other forb species comprised Dove's-foot Crane's-bill *Geranium molle*, Daisy *Bellis perennis*, Self-heal *Prunella vulgaris*, Yarrow *Achillea millefolium*, Common Dandelion *Taraxacum officinale agg.*, Common Ragwort *Jacobaea vulgaris*, Germander Speedwell *Veronica chamaedrys*, Knot Grass *Polygonum aviculare*, and Greater Plantain *Plantago major*. Cover of bare ground was up to 15%, which appeared to be the result of footfall.
- 4.5 An area of modified grassland habitat with 6 – 8 species per m² was present on a sound bank to the south-east of the Site (Appendix 1; Photo 6 and 7). The majority of this habitat was recently mown at the time of survey, except for the south-facing slope, which was left uncut. Yorkshire Fog *Holcus lanatus* was Abundant within the sward, with Cock's-foot Grass and False Oat-grass *Arrhenatherum elatius* Frequent, and Red Fescue Occasional. Forb cover ranged from 4 – 15% per m² and included Yarrow, Dove's-foot Crane's-bill, Ribwort Plantain *Plantago lanceolata*, Cat's-ear *Hypochaeris radicata*, Spotted Medick *Medicago arabica*, Red Clover *Trifolium pratense*, Creeping Buttercup *Ranunculus repens*, Common Sorrel *Rumex acetosa*, and Meadow Buttercup *Ranunculus acris*.

Introduced shrub

- 4.6 A short length (~11.5m) of Cherry Laurel *Prunus laurocerasus* was present along the eastern edge of the grassland habitat to the north-west of the Site (Appendix 1; Photo 8). Please note as it is below 20m it is not classed a hedge in ecology/BNG terms.

Fauna

Bats

Preliminary Roost Assessment of Structures

- 4.7 Table 4.1 below describes the features of the structures and any evidence of suitability for roosting bats.

Table 4.1: Assessment of Buildings Potential to Support Roosting Bats

Overview	
Industrial Warehouse See Appendix 1: Photo 9 for external elevation and Appendix 1; Photo 10 for internal elevation. <u>Walls</u> – Constructed from a mix of concrete and breeze block. Blockwork extends the full height of the building and there is a cavity wall present between the breeze and concrete blockwork. 2 No. metal bay door and a single pedestrian door is present along the elevation. Steel pillars/beams are spaced at intervals along the elevation (visible internally). On the external wall, there is a thin (~1m) band of metal corrugated cladding present at the top of the elevation, which appears to be attached to a timber batten running horizontally. This batten appears to be attached to a metal frame. 2 No. flood lights are present along the elevation. <u>Roof</u> – Flat roof constructed from metal roofing sheets. No roof voids present. <u>Internal</u> – Well-lit and subject to high-levels of human activity and noise from conveyors/machinery.	
Elevation/element	Description/evidence
External	Gaps behind metal cladding / within overhang of metal frame. There are two of these, both located to the right of a large metal sign on the east-facing elevation. Linear gaps were also present where mortar is missing at the join between the metal frame and external blockwork (Appendix 1; Photo 11). Gap where mortar is missing at side of blockwork below cladding (Appendix 1; Photo 12). Gaps above the bay doors which lead into the interior of the warehouse. Gaps where mortar is missing between the external blockwork and steel pillar at side of bay doors, however, the aerial inspection confirmed that these lead directly into the interior of the warehouse. All of the features above were endoscoped by a licenced bat worker and considered 'negligible' for roosting bats (<i>i.e.</i> due to their limited size) and none of the features endoscoped lead into a cavity behind the blockwork.
Internal	Gaps behind the steel pillars and behind pipework. Holes in internal blockwork which appear to lead to a cavity behind the internal and external wall (Appendix 1; Photo 13). 2 No. holes in mortar where a fire alarm has been installed. Given the high levels of disturbance associated with the interior, the gaps (<i>i.e.</i> gaps leading to cavity) along the internal wall are unlikely to be used as access features for bats.

- 4.8 Based on the results above, the section of elevation in close proximity to the proposed works is considered 'negligible' for roosting bats.

Foraging / Commuting

- 4.9 Given the small site size, limited vegetated habitat and presence of external lighting, the vegetated habitats on Site (*i.e.* non-native hedgerow) is considered to offer limited foraging/commuting habitat.

Birds

- 4.10 No signs/evidence of nesting birds were recorded during the field survey; however, the warehouse and non-native hedgerow could support nesting birds.

Badgers

- 4.11 No setts/evidence of Badger were recorded during the field survey.

4.12

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Hedgehogs

- 4.14 The grassland and non-native hedgerow offers suitable foraging/resting habitat for hedgehogs.

Biodiversity Net Gain

- 4.15 The footprint of the proposed new extension has been positioned over an area of existing hard standing, with the loss of vegetated habitat limited to small areas of modified grassland (~58m²) and introduced shrub (~26m²).
- 4.16 In the absence of mitigation, the loss of 58m² of modified grassland and 26m² of introduced shrub will result in a loss of 0.03 biodiversity units on Site. To mitigate this loss, 57m² of modified grassland and 2 No. native trees will be planted on Site, delivering 0.01 biodiversity units and resulting in a 21.64% increase in area-based habitats. See Statutory Biodiversity Metric spreadsheet and habitat condition assessments sheets submitted separately for further details.

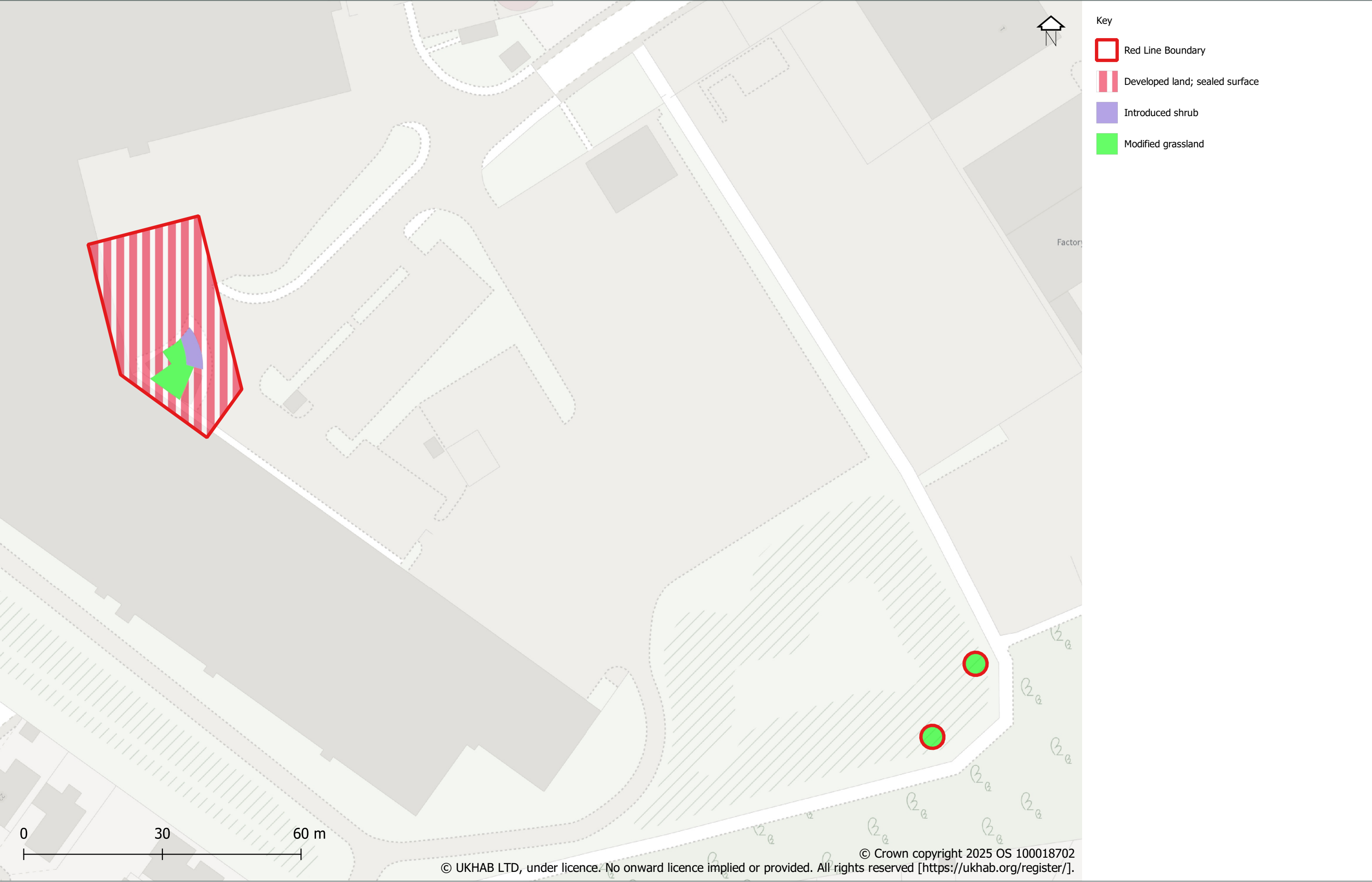
5.0 Biodiversity Impacts, Mitigation and Enhancement

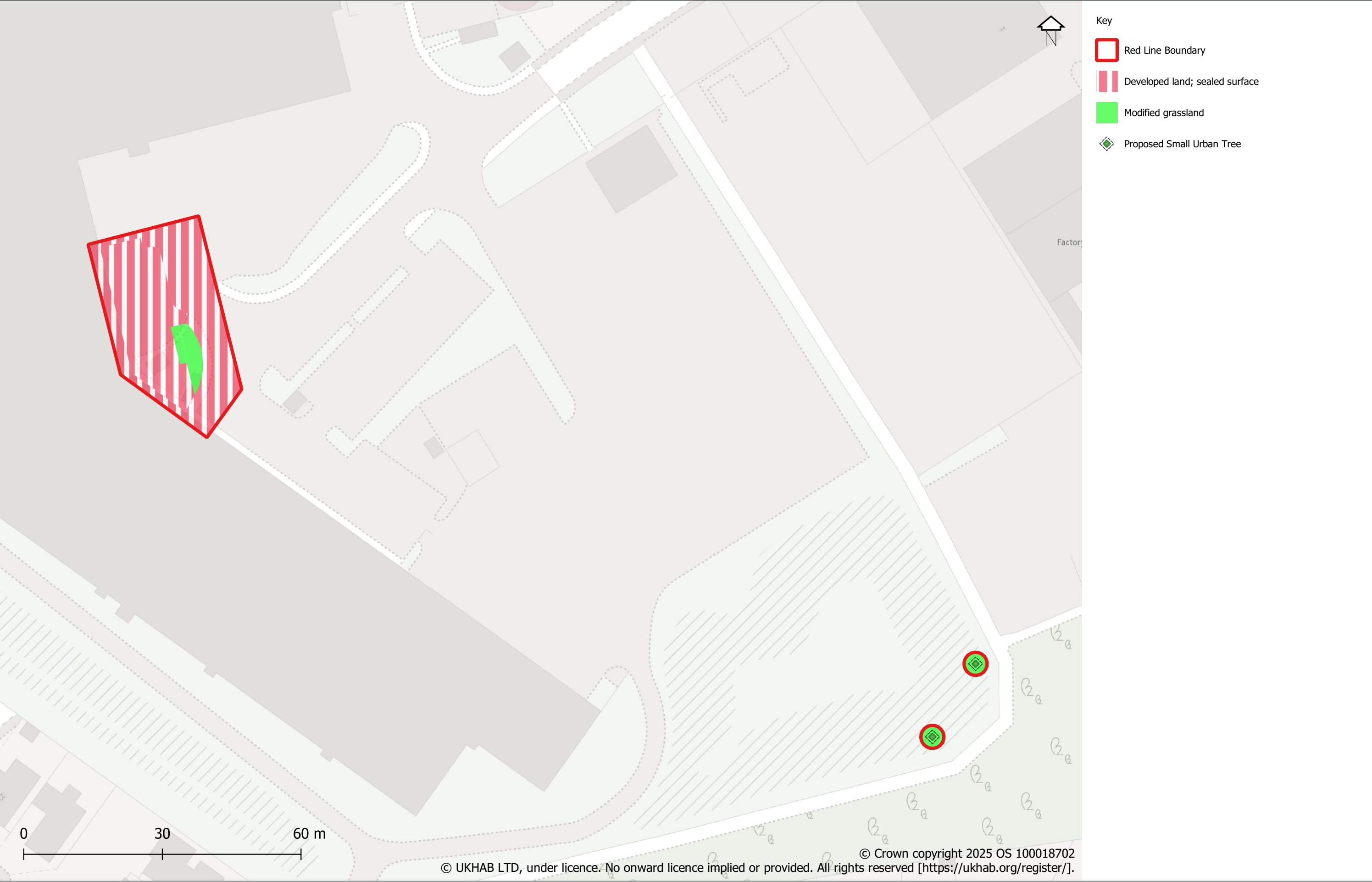
5.1 Whilst the Site is of low ecological value, Table 5.1 below identifies the potential impacts for the ecological receptors identified above and incorporates mitigation measures to avoid and reduce these impacts. It also sets out additional measures to enhance the ecological value of the Site.

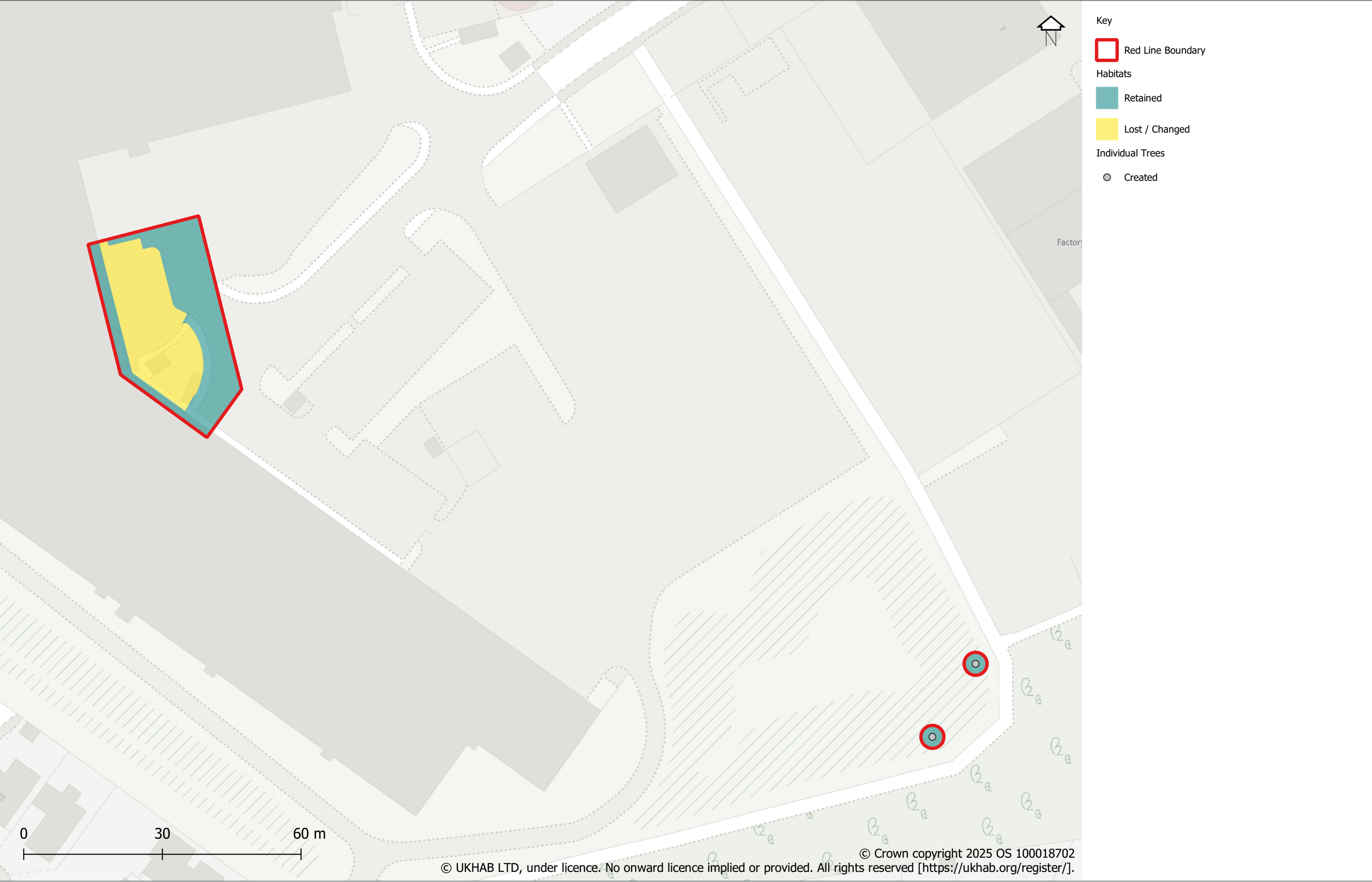
Table 5.1: Potential Impacts, Mitigation and Enhancements

Ecological Receptor	Potential Impact	Design response / Mitigation / Enhancement Measures	Residual Effects
Designated Sites	- None anticipated given small scale nature of works, and no new overnight accommodation proposed. - There are no statutory designated sites on or adjacent to the Site.	None	N/A
Habitats	Loss of 58m² of modified grassland and 26m² of introduced shrub.	Loss of modified grassland mitigated through planting of 57m² of modified grassland and 2 No. small native trees.	Positive effect as demonstrated by > 10% biodiversity net gains within the Biodiversity Net Gain Assessment.
Bats	- Loss of only limited bat foraging/commuting habitat (<i>i.e.</i> non-native hedgerow). - Increased light spill on limited foraging/commuting habitat present.	2 No. small native trees to be planted on Site. - Any construction or operational lighting to be sensitively designed in accordance with best practice guidance (BCT and ILP Guidance Note 08/23).	Not significant
Birds	- Loss of suitable bird nesting habitat (<i>i.e.</i> 11.5m of non-native hedgerow). - Potential loss/damage of a birds' nest (including risk of disturbance/nest abandonment) during construction of new extension and through removal of hedge.	2 No. small native trees to be provided on Site. - Works to warehouse and vegetation clearance to either be undertaken outside of the recognised nesting bird season (March – August) or with prior check (within 24hrs) by a competent person. In the event that an active nest is found, then works will cease until the chicks have fledged.	Not significant

Ecological Receptor	Potential Impact	Design response / Mitigation / Enhancement Measures	Residual Effects
		1 No. bird box to be affixed to a mature tree within ownership boundary.	
Badgers	- No evidence/setts recorded on Site and low risk of a badger sett being created in the future. - Risk of entrapment in open excavation.	All excavations during construction will be covered overnight and means of escape (<i>i.e.</i> ramps) provided.	On the basis that that current usage of the Site will remain the same, a precautionary check for Badger setts ahead of the works will not be required.
Hedgehogs	Risk of entrapment in open excavation.	- All excavations will be covered overnight and means of escape (<i>i.e.</i> ramps) provided. - All arisings/materials to be stored in a way that are either inaccessible to hedgehogs (e.g. in skips, on hardstanding, raised off the grass, be free of suitable access crevices) or be cleared/removed before the end of the working day.	Not significant







Appendix 1: Photographs

Photo No.	
1.	 Area of hard standing / forecourt comprising majority of Site.
2.	 Metal constructed bike shelter.

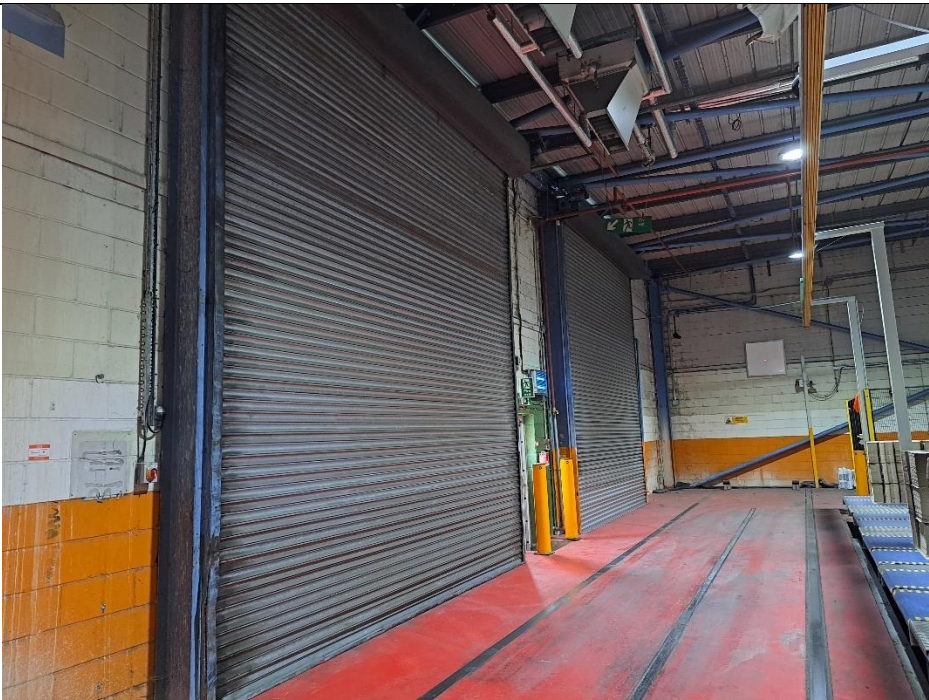
3.	 Area of species-poor grassland habitat.
4.	 View looking down at sward of grassland habitat.

5.		
6.		

View looking down at sward of grassland habitat showing high cover of Creeping Buttercup / White Clover

View looking south-east at area of modified grassland on sound bank to south-east of Site.

7.	 View looking down at sward of modified grassland (uncut areas) to south-east of Site.
8.	 Short Cherry Laurel hedge along edge of grassland habitat to north-west of Site.

9.	 A photograph showing the exterior of a large industrial building with a blue corrugated metal roof and light-colored brick walls. The building features several large roller doors, some of which are closed. In the foreground, there is a paved area with orange and white traffic cones and a yellow and black striped barrier. To the right, there are stacks of materials and a red and white striped barrier. The sky is overcast with grey clouds.
10.	 A photograph showing the interior of a large industrial building. The view is from a low angle, looking down a long corridor. The floor is painted red with yellow lines. On the left, there is a large, closed roller door. The ceiling is high with exposed steel beams and various pipes and cables. A yellow crane or hoist is visible in the background.

11.	 Linear gap present where mortar is missing at the join between the metal frame and external blockwork.
12.	 Gap where mortar is missing at side of blockwork below cladding.

13.



Holes in internal blockwork which appear to lead to a cavity behind the internal and external wall.

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