

Ecological Impact Assessment



Tyler
Grange

ALDI, Trowbridge
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Summary

- S.1. This report has been prepared by Tyler Grange Group Limited on behalf of ALDI Stores Ltd. It sets out the findings of an Ecological Impact Assessment at ALDI, Bradley Road, Trowbridge BA14 0QT, hereinafter referred to as 'the site'. The proposals are for the extension of the store and redevelopment of the car park.
- S.2. An 'extended' Phase 1/UK Habitat Classification (UKHabs) survey and Preliminary Roost Assessment was undertaken on the 20th August 2025. A summary of the results are as follows:
- The site is comprised of developed land, including a building and hardstanding, ornamental planting and scattered trees; and
 - The site contains habitats that could support common and widespread nesting and foraging birds.
- S.3. Given the nature of the site proposals and the distances involved between the site and Bath & Bradford on Avon Bats Special Area of Conservation (SAC), and Salisbury Plain SAC, and Special Protection Area (SPA), no adverse direct or indirect effects are anticipated, and no specific mitigation is required.
- S.4. Habitats of negligible ecological importance are to be lost to the development, consisting of developed land and landscaping which includes native but immature trees, to be compensated as part of the Biodiversity Net Gain (BNG) strategy.
- S.5. The BNG assessment found that the proposals would result in a net loss of 97.19% in habitat units. As such 0.44 habitat units would be required through off-site compensation, with at least 0.41 of these units to be of medium distinctiveness habitat for the scheme to achieve a 10% biodiversity net gain and to satisfy the trading rules. With 10% net gain and trading rules secured, the proposals would be compliant with the Town and Country Planning Act 2024 which mandates a 10% net gain in biodiversity units, with local planning policy, as well as the National Planning Policy Framework (NPPF).
- S.6. In conclusion, in anticipation of the implementation of any necessary mitigation and purchase of off-site Biodiversity Net Gain (BNG) units, the proposed development will be compliant with Core Policy 50 of the Wiltshire Core Strategy, as well as national legislation with regard to ecology.



Section 1: Introduction and Context

Introduction

- 1.1. This report has been prepared by Tyler Grange Group Ltd on behalf of ALDI Stores Ltd. It sets out the findings of an Ecological Impact Assessment (EclA) at ALDI Trowbridge, BA14 0QT (OS Grid Reference ST 85221 56881), hereafter referred to as 'the site'. See **Figure 1.1** for the indicative red line boundary.



Figure 1.1: Indicative red line boundary (© Google Aerial Imagery)

- 1.2. This assessment has been undertaken to inform a planning application for the development of the site to comprise an extension to the existing supermarket building, and works to the existing car park. The site proposals are shown in **Appendix 1**.

Site Context

- 1.3. The site is approximately 0.50 ha in size and comprises a building, hardstanding, artificial unsealed surface, ornamental planting, and scattered trees. The site is located within the urban area of Trowbridge and is bordered by residences and businesses. To the south is a playing field, and the A363 runs along the east of the site.

Purpose

- 1.4. This report:
- Uses available background data and results of the field surveys to describe and evaluate the ecological features present within the likely "Zone of Influence"¹ (Zoi) of the proposed development;

¹ Defined by the CIEEM (2024) Guidelines for Ecological Impact Assessment as the area over which ecological features may be affected by biophysical changes as a result of the proposed project and associated activities. This is likely to extend beyond the project site, for example where there are ecological or hydrological links beyond the site boundaries

- Describes the actual or potential ecological issues and opportunities that might arise as a result of the site's development.
- Where appropriate, makes commitments for mitigation measures for adverse effects on ecological features as well as ecological enhancements, to ensure conformity with policy and legislation listed in **Appendix 2**; and
- Can be used to inform a planning application for the site's development.

1.5. This assessment and the terminology used are consistent with the Guidelines for Preliminary Ecological Appraisal² and the Guidelines for Ecological Impact Assessment³. A full methodology is set out in **Appendix 3**.

Methodology

1.6. Full methods for the data search, UKHabs survey, Preliminary Roost Appraisal (PRA), Ground-level Tree Assessment (GLTA), Day-time Bat Walkover (DBW) and Biodiversity Net Gain (BNG) assessment can be found in **Appendix 3**.

Quality Control

1.7. All ecologists at Tyler Grange Group Limited are members of the Chartered Institute of Ecology and Environmental Management (CIEEM) or are working towards membership, and act under the direction of members and abide by the Institute's Code of Professional Conduct⁴.

Limitations and Assumptions

1.8. Due to access constraints, it was not possible to closely inspect the south west corner of the building. However, the works planned will not impact this aspect of the building.

1.9. Due to the low impact of the works planned, and the urban context in which the site is located, a full data search was not requested from a Local Environmental Records Centre (LERC). A desk-study was undertaken using publicly accessible records from websites including Multi-Agency Geographic Information for the countryside (MAGIC).

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

³ CIEEM (2024) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Chartered Institute of Ecology and Environmental Management, Winchester.

⁴ CIEEM (2025) Code of Professional Conduct, CIEEM, Winchester



Section 2: Ecological Features and Evaluation

Designated Sites

- 2.1. The data search was based on freely-accessible data from the Multi-Agency Geographic Information for the Countryside (MAGIC). See **Appendix 3** for full methodology.
- 2.2. The data search returned two internationally designated sites within 10 km of the site. These are detailed in **Table 2.1** below. No nationally designated sites were returned within 2 km of the site. One non-statutory designated site, was returned. Southwick Country Park Local Nature Reserve (LNR) is located approximately 1.3 km southwest.



Table 2.1: Designated Sites

Designated site	Distance and direction from site	Citation	Ecological Importance
Bath & Bradford on Avon Bats Special Area of Conservation (SAC)	6.7 km northwest	Annex II species that are a primary reason for selection of the site: greater horseshoe bat <i>Rhinolophus ferrumequinum</i> , and Bechstein’s bat <i>Myotis bechsteinii</i> . Lesser horseshoe bats <i>Rhinolophus hipposideros</i> are an Annex II species present as a qualifying feature, but not a primary reason for site selection.	International
Salisbury Plain SAC, Special Protection Area (SPA)	7.7 km southeast	Primary reasons for designation as an SAC are the Annex I habitats: <i>Juniperus communis</i> formations on heaths or calcareous grasslands; and Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>); and the Annex II species: marsh fritillary butterfly <i>Euphydryas aurinia</i> . Designated as an SPA as it regularly supports nationally important populations of the Annex I species; stone curlew <i>Burhinus oedicephalus</i> , and hen harrier <i>Circus cyaneus</i> . It also supports small numbers of the Annex I species; merlin <i>Falco columbarius</i> , short-eared owl <i>Asio flammeus</i> , and Montagu’s harrier <i>Circus pygargus</i> .	International
Southwick Country Park Local Nature Reserve (LNR)	1.3 km southwest	Site contains grassland being managed to increase floristic diversity; veteran and ancient oak <i>Quercus robur</i> and ash trees <i>Fraxinus excelsior</i> ; the Lambrook stream, its tributary and ponds. It is also home to protected species including water voles <i>Arvicola amphibius</i> ; bats, including Bechstein’s, and greater horseshoe, adder <i>Vipera berus</i> , and red listed bird species.	Up to County

- 2.3. The site falls into the SSSI Impact Risk Zone for Iford Manor SSSI. However, the development does not fall into any of the criteria set out by Natural England requiring further assessment, such as aviation proposals. As such consultation with Natural England is not considered necessary, and this is **not discussed further within this report**.

Habitats and Flora

- 2.4. The habitats present on site are summarised below in **Table 2.2**, along with a description of the composition of the main plant species present and an assessment of their ecological importance. The location of habitats are shown on the Habitats Features Plan **18302/P01**.



Table 2.2: Habitats and Flora

Habitat	Description and Species	Ecological Importance	Photograph
<u>Primary code:</u> Built-up areas and gardens u1 Developed land; sealed surface u1b Buildings u1b5 <u>Secondary code(s):</u> Car Park 804 Commercial building 815 Introduced Shrub 847	There is one building within the site boundary (referenced as B1 on plan 18302/P01). B1 is a single-storey building of brick-and-mortar construction, with a pitched tile roof and metal cladding and soffits. The majority of the site comprises a carpark, currently in use and accessible to the public. There are small areas of introduced shrub within the car park.	This habitat is a built environment and as such has no inherent ecological importance. The potential for the building to support protected species is discussed below in Section 2.	
<u>Primary code:</u> Built-up areas and gardens u1 <u>Secondary code(s):</u> Scattered trees 11	There are four scattered trees throughout the car park. Species present included silver birch <i>Betula pendula</i>, and an <i>Acer</i> hybrid.	The scattered trees are a mix of native and non-native species. As they are immature, and are very common in the wider landscape, they are considered to be of negligible ecological importance.	

Protected and Notable Species

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

Amphibians

- 2.6. No European Protected Species (EPS) licences were returned for GCN within 2 km of the site, in the past 10 years. The closest granted EPS licence was approximately 0.6 km east of the site in 2012 (case reference: EPSM2012-4095).
- 2.7. The data search found one pond within 250 m of the site, which is generally considered to be within the typical migratory range of GCN from a waterbody⁵. The area of introduced shrub could offer suitable habitat for GCN, however its extent is very limited, and isolated. Given the lack of aquatic habitat within or in close proximity to the site and the suboptimal nature of the terrestrial habitats present on site, as well as the presence of dispersal barriers such as roads, the site is considered unlikely to support GCN.
- 2.8. As such, GCN considered **likely absent from the site and are not discussed further within the report**.
- 2.9. Other more mobile amphibian species such as common toad may be present. Common toads are a priority species under The Natural Environment and Rural Communities (NERC) Act 2006⁶. It is considered any population utilising terrestrial habitats on site, such as the introduced shrub, will also be using further habitats beyond the site boundary and not reliant on the site alone.
- 2.10. As such, any population of amphibians such as common toad on site would be of **negligible ecological importance**.

Bats

- 2.11. One EPS licence for bats was returned within a 2 km radius of the site within the last 10 years. This was located approximately 1.6 km northeast of the site (case reference: 2020-48340-EPS-MIT) and was granted for the destruction of a resting place of common pipistrelle *Pipistrellus pipistrellus*.

Bat Activity

- 2.12. The site lies within an urban context, with high levels of light pollution on and adjacent to site, and limited habitats for commuting and foraging bats in the wider landscape. It is assumed that light tolerant species, such as common and soprano pipistrelle *Pipistrellus pygmaeus*, would be present in the surrounding areas. However, the habitats on site, such as the urban

⁵ Cresswell, W. & Whitworth, R., 2004. An assessment of the efficiency of capture techniques and the value of different habitats for the great crested newt *Triturus cristatus*: English Nature Research Report 576, Peterborough: English Nature.

⁶ Section 40 of the NERC Act puts a duty on local authorities to have regard for the conservation of species and habitats listed at Section 41, including when considering planning applications.



trees are limited and don't provide significant commuting and foraging opportunities for bats due to their small size and low diversity.

- 2.13. Overall, the assemblage of bats expected to utilising the site for foraging and commuting is considered to be of **negligible ecological importance**.

Preliminary Roost Assessment

- 2.14. A PRA was conducted alongside the 'extended' UKhabs survey on August 20th 2025. This assessment was carried out on the buildings and trees on site, which may be impacted by the development. See **Appendix 3** for methodology, **Table 2.3** below for results, and the Habitat Features Plan **18302/P01** for locations.
- 2.15. Building B1 was assessed as having negligible suitability to support roosting bats, as although there PRFs are present, it is unlikely that they would be used. This is due to other factors, such as the poor habitat connectivity of the site, and the high light and noise pollution.



Table 2.3: PRA Results

Structure/tree and Suitability	Potential Roost Feature (PRF)	Photograph
Building B1 – ALDI store – Negligible suitability	PRF A – End tiles of the roof on all aspects of the building offer space to potentially support a small number of crevice-dwelling species, such as common or soprano pipistrelle.	
	PRF B – Section of lifted metal flashing on the eastern elevation offers space to potentially support a small number of crevice-dwelling species.	

Structure/tree and Suitability	Potential Roost Feature (PRF)	Photograph
	PRF C – Section of lifted metal flashing on the northern aspect of the building offers space to potentially support a small number of crevice-dwelling species.	
Trees	No PRFs were identified on any trees within the site boundary.	

Birds

- 2.17. Habitats on site, such as the building, and urban trees, have the potential to support common and widespread nesting birds.
- 2.18. It is considered the assemblage of birds that may use the site for foraging and breeding is of **negligible ecological importance**, nevertheless consideration for nesting birds to avoid a breach of legislation is discussed in **Section 3** of this report.



Section 3: Ecological Impacts, Mitigation, and Enhancement

Proposed Development

- 3.1. The proposals are for the extension of the store, and redevelopment of the car park. The potential impacts at this site as a result of the proposed development are set out below, with reference to relevant legislation and planning policy, which is summarised in **Appendix 2**.

Potential Impacts and Requirement for Mitigation

- 3.2. Both the Countryside and Rights of Way (CroW) Act 2000 and the Natural Environment and Rural Communities (NERC) Act 2006 give the importance of conserving biodiversity a statutory basis, requiring government departments (which includes Local Planning Authorities) to have regard for biodiversity in carrying out their obligations (which includes determination of planning applications) and to take positive steps to further the conservation of listed species and habitats. These articles of legislation require Wiltshire Council to take measures to protect species or habitats from the adverse effects of development, where appropriate, by using planning conditions or obligations. Planning authorities should refuse permission where harm to the species or their habitats would result, unless the need for, and benefits of, the development clearly outweigh the harm.
- 3.3. The National Planning Policy Framework (NPPF) 2024 requires that the planning system should contribute to and enhance the natural and local environment, minimising impacts on biodiversity and providing net gains, as well as local planning policy, a summary of which is provided in **Appendix 1**.

Designated Sites

Statutory Sites

- 3.4. Given the nature of the site proposals and the distances involved between the site and Bath & Bradford on Avon Bats SAC, Salisbury Plain SAC and SPA, and Southwick Country Park LNR, no adverse direct or indirect effects are anticipated as a result of the proposals. Standard best practice pollution prevention⁷ will be followed.

Habitats and Flora

- 3.5. Most of the habitats onsite to be impacted by the proposals are of negligible ecological importance, namely the building, hardstanding and vegetated garden, and as such no specific mitigation is required.

⁷ CIRIA (2015) Construction Work Sector Guidance for Designers. Fourth edition



- 3.6. Three of the scattered trees, which are of negligible ecological importance, will be lost to facilitate the adjusted HGV turning circle. All three trees are immature silver birches. Another scattered tree will be removed to allow the installation of an EV post.

Protected and Notable Species

Bats

- 3.7. As stated in Section 2.15, Building B1 was assessed as having negligible suitability to support roosting bats, as although there PRFs are present, it is unlikely that they would be used. This is due to the poor habitat connectivity of the site, and the high light and noise pollution. Therefore, no further survey are recommended, in line with best practice guidance⁸.
- 3.8. The works to the building comprise the extension of the northern aspect, and new roof access steps on the western aspect, so PRF B will not be impacted by these works. The end roof tiles, and PRF C pictured in **Table 2.3** will be removed to facilitate the works, these features have the potential to support a small number of crevice-dwelling species. However, the site is in an urban location, there are high levels of light pollution, and there is poor connectivity to suitable habitat. In addition, there are many similar and more suitable features offering roosting opportunities in the immediate offsite area. In line with guidance relating to negligible PRFs, no specific mitigation is required, however, in the unlikely event of a bat is discovered during construction, works would stop and advice sought from Natural England in how to proceed.
- 3.9. It is anticipated that lighting levels post-construction will be the same as baseline, as such a sensitive lighting strategy will not be required.

Birds

- 3.10. All birds, their nests and eggs, are protected by law and as such it is an offence to intentionally kill, injure, or take any wild bird; intentionally take, damage, or destroy the nest of any wild bird while it is in use or being built; and intentionally take or destroy the egg of any wild bird.
- 3.11. To avoid triggering the legislation protecting nesting birds, clearance of suitable habitat (the buildings, trees, and introduced shrub) should be timed outside the nesting bird season (generally taken as March to September inclusive, though this is not defined in law and birds may nest outside of this time). If any clearance works to nesting habitats are required during the nesting season, then pre-removal checks for nesting birds must be carried out by a suitably experienced Ecological Clerk of Works (ECoW), no more than 48 hours prior to the works commencing. If any nesting birds are found to be present, an appropriate buffer zone will be implemented, within which works are excluded for the duration of the breeding attempt. Any active nests will need to be left in situ until a suitably experienced ecologist confirms that the chicks have fledged and the nest is no longer active.

⁸ Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th Edition. The Bat Conservation Trust, London



Section 4: Biodiversity Net Gain

- 4.1. Core Policy 50 of the Wiltshire Core Strategy (adopted January 2015), as well as the NPPF, requires developments to demonstrate a net gain in biodiversity (see Appendix 1). In addition, the Town and Country Planning Act mandated a 10% net gain of biodiversity units, from February 2024.
- 4.2. A development achieves biodiversity net gain when the total biodiversity units present post-development are higher than that of the biodiversity units present on site prior to development. The Statutory Biodiversity Metric has been used to calculate the biodiversity value of the site before and after development in terms of “biodiversity units” to calculate an overall biodiversity net gain or loss.

Existing Habitats

- 4.3. The following habitats, detailed in **Table 4.1**, are present within the red line boundary of the site. These habitats are summarised in **Section 2** of this report and are shown on Habitat Features Plan **18302/P01**. No watercourses or linear habitats were present. The rationale for condition assessments is detailed within the metric **18302/BNG**.



Table 4.1: Baseline Habitats and Areas Retained and Enhanced

Broad Habitat	Habitat Type	Area (hectares)	Distinctiveness	Condition	Area retained (hectares)	Area enhanced (hectares)	Area lost (hectares)
Urban	Developed land; sealed surface	0.478	V.Low	N/A - Other	0.474	0	0.004
Urban	Artificial unvegetated, unsealed surface	0.019	V. Low	N/A - Other	0.017	0	0.002
Urban	Introduced shrub	0.003	Low	N/A	0.001	0	0.002
Individual Trees	Urban Tree	0.049	Medium	Moderate	0	0	0.049
Individual Trees	Urban Tree	0.004	Medium	Poor	0	0	0.004

Proposed Habitats

- 4.4. The proposals, as shown within **Appendix 1** and the Post-development Habitat Plan **18302/P02**, have been used to calculate the proposed habitat areas. The rationale for target condition assessments is detailed within the accompanying Defra metric **18302/BNG**.

Table 4.2: Created and Enhanced Habitats

Broad Habitat	Proposed habitat	Area (hectares)	Created/enhanced	Baseline condition	Distinctiveness	Target condition
Urban	Developed land; sealed surface	0.001	Created	N/A	V. Low	N/A - Other
Urban	Introduced Shrub	0.005	Created	N/A	Low	N/A
A net loss of 0.40 habitat units, -97.19%						



Results Summary

- 4.5. As described within The Statutory Biodiversity Metric **18302/BNG** and summarised below in **Figure 4.1**, based on the habitats present on site that will be lost and those to be created, the development would result in a loss of 0.40 habitat units. This is a percentage loss of 97.19% in habitat units. The trading summaries have not been satisfied as the proposals do not result in a 10% net gain in habitat units, and also as there is a net loss of 0.41 units of medium distinctiveness habitat, which has not been compensated for.

Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	<i>Habitat units</i>	-97.19%
	<i>Hedgerow units</i>	0.00%
	<i>Watercourse units</i>	0.00%
Trading rules satisfied?		No - Check Trading Summaries ▲

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

Management

- 4.6. The results of The Statutory Biodiversity Metric are based on the habitats within the site being maintained at a certain condition, as prescribed by the condition assessment sheets published by Defra.

Off-Site Compensation

- 4.7. It is not considered practicable or achievable to increase the quantum, distinctiveness, or the conditions of habitats created, due to the operational requirements of the proposed development, and the realistic expectations for the successful establishment of selected habitats.
- 4.8. Consequently, it is considered that the most appropriate way to compensate for the loss of onsite habitat units is through financial contribution to a habitat bank provider, with a biodiversity gain plan conditioned to demonstrate the legal agreements between the applicant and the selected third-party provider, to illustrate how 10% biodiversity net gain is being achieved through off-site contributions. As demonstrated by the statutory metric (**18302/BNG**) 0.44 habitat units would be required through an off-site provider, with a minimum of 0.41 of those being for habitats of medium distinctiveness or higher, for the scheme to achieve a 10% biodiversity net gain and satisfy the trading rules.



Section 5: Conclusions

- 5.1. Three statutory designated sites, and one non-statutory designated site were assessed: Bath & Bradford on Avon Bats SAC, Salisbury Plain SAC and SPA, and Southwick Country Park LNR. No impacts to these sites are anticipated as a result of the proposals. Standard best practice to pollution prevention will be followed.
- 5.2. The development will affect habitats of negligible ecological importance, comprising hard standing, and four immature trees.
- 5.3. Building B1 was assessed as having negligible suitability to support roosting bats, as although there are PRFs that a bat could use, it is unlikely that they would due to the poor connectivity of the site, and the high light and noise pollution. Therefore, no further survey are required. Should vegetation be removed, or the building altered during the core nesting bird season (March-August, inclusive), a pre-works check by an ECoW would be required to determine whether active birds' nests are present.
- 5.4. The proposals would result in a net loss of 0.40 habitat units, -97.19%. As such 0.44 habitat units would be required through off-site compensation, with at least 0.41 of these units to be of medium distinctiveness habitat for the scheme to achieve a 10% biodiversity net gain and to satisfy the trading rules.
- 5.5. In conclusion, in anticipation of the implementation of any necessary mitigation and purchase of habitat units, the proposed development will be compliant with Core Policy 50 of the Wiltshire Core Strategy, as well as legislation relating to ecology.

