



Land South Of Park Street . Preliminary Ecological Appraisal (PEA)



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SURVEYOR and AUTHOR:	The Preliminary Ecological Appraisal was undertaken by Evie Rice MSci (Hons), a Qualifying member of CIEEM. Evie has four seasons of bat survey experience and a range of ecological surveys, including UK Habitat Classification surveys and nesting bird surveys.
REVIEWER:	The results have been reviewed and assessed by James Mansfield BA (Hons), a Full member of the Chartered Institute of Ecology and Environmental Management (CIEEM). James has over eight years' experience undertaking ecological surveys and is a holder of a Class 2 (CL18) survey licence for bats (ref: 2020-44740-CLS-CLS); (CL29) for barn owls (ref: 2023-11377-CL19-OWL); and a Bat (Possession) Licence holder (ref: 2020-47163-SCI-SCI). James is also the former Principal (County) Ecologist for Somerset Council.
COMPANY DETAILS:	BN Ecology Ltd, Programme, The Pithay, Bristol, BS1 2NB
ISSUED TO:	Caroline Martin
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Non-technical Executive Summary

Background and Proposals

In January 2026, BN Ecology was commissioned by Caroline Martin (hereon referred to as 'the client') to undertake a Preliminary Ecological Appraisal to support planning proposals comprising the erection of nine dwellings and associated works on Land South of Park Street, Heytesbury, Warminster BA12 0AF (delineated as the redline boundary, totaling 0.4921 ha). The key objective of this Preliminary Ecological Appraisal was to record and highlight key habitats onsite and assess the potential the Site has to support or bolster the ecological network for protected species & species of conservation concern. Where necessary, any material ecological considerations for the Site have been noted, and in turn support the results and recommendations.

The client submitted a pre-application enquiry to Wiltshire Council, and a response was received from the Local Planning Authority Ecologist. As part of the pre-application response, the County Ecologist detailed feedback in relation to what the proposals need to materially consider. This report in part, aims to address key points outlined by the County Ecologists pre-application response.

Ecology Survey Methods & Surveyor Competencies

The Preliminary Ecological Appraisal was undertaken in accordance with Codes of Practice as set out in the UK Habitats classification system¹; the Chartered Institute of Ecology and Environmental Management²; the Bat Conservation Trust Good Practice Guidelines for Bat Surveys³; and the BS 42020:2013 *Biodiversity – Code of Practice for Planning and Development* (BSI 2013).

The Preliminary Ecological Appraisal was performed by Evie Rice. All findings are supported by a desk study. Results of the Preliminary Ecological Appraisal are illustrated in a habitat map (Appendix 2), which represents habitat types (outlined as target notes ('TN')) and identifies locations of evidence or potential for protected species and species of conservation concern on Site. Photos of the site are also provided (Appendix 1). These support the results and recommendations outlined in this report.

Results

The Site is located within a semi-rural setting on the eastern edge of Heytesbury village. Park Street forms the northern boundary of the red line area. To the east, the Site adjoins agricultural land, which was observed to be grazed by sheep at the time of the site visit. This field is separated from the Site by a h2a - native hedgerow, bordered on both sides by stock-proof post-and-wire fencing. The hedgerow lies outside the applicant's ownership and is therefore not included within the red or blue line boundaries. The Site is bordered by residential properties with sizable

¹ UK Habitat Classification, Habitat Definitions, Version 2.0, 2023.

² Chartered Institute of Ecology and Environmental Management, *Guidelines for Preliminary Ecological Appraisal, Second Edition*: Ampfield, Romsey. Issued December 2017.

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

garden plots. Dwellings are located immediately west along Mantles Lane and Old Forge Close. The River Wylfe lies approximately 60m to the south-west of the red line boundary.

The wider landscape is predominantly rural in character, comprising parcels of arable land bordered by mature hedgerows, hedgerows with trees, and established tree lines.

The Site comprises five habitat types :

- g4 – Grassland - Modified Grassland
- hd3 – Bramble Scrub
- u1f – Sparsely Vegetated
- u1b – Urban – Developed Land
- 33 – Line of Trees
- 32 – Individual Trees – Rural Trees

The g4 – Modified Grassland that covers the majority of the site, is of low ecological value and can be readily recreated and enhanced. It is bordered to the north by a 33 – Line of Trees which is of moderate ecological intrinsic value to the local landscape.

Group G4 comprises predominantly young elm and plum trees of poor quality and declining condition. The elm specimens exhibit symptoms consistent with Dutch elm disease and are therefore recommended for removal. The majority of trees within G4 are immature and do not meet the BNG metric threshold for classification as “trees” (DBH >7.5 cm). Trees T15, T16, and T17 are similarly identified as low-quality plum specimens.

The proposed access road will have a width of 4.8m. However, to accommodate the required visibility splays, a wider section of the existing treeline—measuring approximately 11m at its maximum extent—will need to be removed between T15 and T17.

The remaining habitat losses are limited to low distinctiveness habitats, comprising g4 – Modified Grassland and u1f – Sparsely Vegetated Land.

The proposed development site does not sit within or adjacent to any priority habitat.

Consideration has been given to the following protected species or notable features:

⁴ Baxter, N (November 2025). *Arboricultural Impact Assessment & Tree Protection Plan For trees on land at Park Street in Heytesbury*. NBTREEMANAGEMENT: Shaftesbury.

- Above ground nesting birds
- Foraging and commuting habitats for bats
- Terrestrial badger activity
- The habitat suitability for amphibians during terrestrial phases
- Suitability for hazel dormouse
- The habitat suitability for reptiles during terrestrial phases
- Terrestrial habitat potential for hedgehog
- Terrestrial habitat potential for brown hare
- Terrestrial and riparian habitat suitability for otter and water vole
- Root Protection Zones for retained trees
- Potential impacts on statutory designated and non-statutory site's

Recommendations

The recommendations outlined in this report briefly comprise:

- Mitigation measures for:
 - **Amphibians – FURTHER ACTION REQUIRED**
 - Bats
 - Badgers
 - Nesting birds
 - Reptiles
 - Hazel dormouse
 - Hedgehogs
 - Water voles
 - Protection of retained habitats
 - On-site enhancements

The report also recommends that a sensitive lighting scheme for bats is designed (if any artificial lighting is required to facilitate the proposals) to ensure the boundary features are not subject to excessive artificial light spill.

No further survey effort is recommended, subject to the recommendations delineated in this report being secured. It is considered that the recommendations can be secured by way of planning obligations, such as conditions.

Baseline Habitat Map



1. Introduction, Background and Project Details

- 1.1. This report has been compiled to support a proposal comprising the erection of nine dwellings and associated works on Land South of Park Street, Heytesbury, Warminster BA12 0AF delineated as the 'redline boundary', totalling 0.4921 ha. The grid reference for the redline boundary site is ST92864252.
- 1.2. The Preliminary Ecological Appraisal has been carried out by BN Ecology to assess the ecological baseline of the site, and where necessary, determine if further Phase II species specific surveys are required.
- 1.3. This report demonstrates and confirms that there are no significant ecological constraints beyond the implementation of avoidance, mitigation and minor compensatory measures, as outlined in section six of this report, in relation to nesting birds; foraging and commuting bats; reptiles during terrestrial cycles; hedgehogs, badgers & water voles during terrestrial cycles; and protection protocols for hedgerow and trees. Further action is required in relation to:
 - Great crested newt, due to the presence of two ponds within 250m of the site.

Table 1. – Site Specific Information	
Category	Site Specific Information
Site Name	Land South of Park Street
Site Location	Land South of Park Street, Heytesbury, Warminster, BA12 0AF
Local Authority	Wiltshire Council
Overall Site Area (Redline)	0.4921 ha
Overall Site Area (Blueline)	1.1 ha
Existing Land Use (Redline)	Agricultural
Existing Land Use (Blueline)	Agricultural
Proposed Land Use (Redline)	Residential and Landscaped Open Space
Proposed Land Use (Blueline)	Agricultural and Landscaped Open Space

2. Report Objectives

2.1 – The Objectives Set Out in this Report
- To establish the baseline ecological conditions within the redline boundary and future changes resultant from the proposed development. - To consider significant impacts resultant from the proposed development and identify any ecological considerations and constraints that will inform the proposals design and working methods during the construction phase.

- To assess if development is likely to be in accordance with wildlife legislation.
- HRA Screening (only if within a Consultation/Impact Risk Zone).
- To identify the need for further species specific (commonly referred to as Phase Two) surveys if needed.
- To establish enhancements in accordance with the National Planning Policy Framework (excluding mandatory Biodiversity Net Gain as instilled by the Environment Act 2021, which is addressed in a separate report).

3. Methodology

3.1 Desk Study Assessment

A desk study was performed in January 2026 to inform of local records, some or all information which may be relevant to the proposal. Online resources (in this instance, the Multi-Agency Geographic Information for the Countryside (MAGIC)⁵ website) were used as part of this exercise, and included the following:

- Information pertaining to Statutory Site Designations within 2km of the Site, and within 5km for designations relating to bats.
- Information pertaining to European Protected species licences that have been issued within 2km of the Site.
- Any notable Priority Habitats listed under the Priority Habitats inventory onsite or close to the Site.
- Information relating to Sites of Special Scientific Interest (SSSI), including any associated features that may be within the Site boundary, or within an Impact Risk Zone.
- Any other relevant faunal, floral or geological information.

Google Maps⁶ was also used to view satellite images of the Site from an aerial and street view context.

Not all of the below abbreviations are necessarily used within this report. However, for thoroughness, common abbreviations used in such reports include:

- SAC = Special Areas of Conservation
- SPA = Special Protection Area
- SSSI = Site of Special Scientific Interest
- NNR = National Nature Reserve
- LNR = Local Nature Reserve
- AONB = Area of Outstanding Natural Beauty
- SNCI = Site of Nature Conservation Importance
- ASNW = Ancient Semi-Natural Woodland
- RAWs = Restored Ancient Woodland Site
- PAWS = Plantation of Ancient Woodland Site
- NE = Natural England
- WSBRC = Wiltshire and Swindon Biological Records Centre

⁵ <https://magic.defra.gov.uk/MagicMap.aspx>

⁶ <https://www.google.co.uk/maps/@52.8382004,-2.3278149,6z>

PLEASE NOTE: As part of the Preliminary Ecological Appraisal, the client did not commission local records to be obtained by Wiltshire Environmental Records Centre.

Aerial images and Ordnance Survey maps were utilised to characterise the wider landscape. Off-site features and habitats were examined and assessed in relation to the ecological value they contribute to existing ecological networks that are tangibly associated with the site.

Ancient woodland has been defined as non-statutory designated sites for the purposes of this report. Such habitats are defined as 'irreplaceable' and receive strong protection through the National Planning Policy Framework (NPPF). More recently, their protection is further strengthened in Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 as a result of the Biodiversity Net Gain (BNG) policy, specifically associated with Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024.

3.2 Field Survey

Habitats:

A walkover of the Site was undertaken on the 29th of January 2026. The survey nature was an extended UK Habitat Classification Survey, specifically to inform the baseline of the habitats present on-site and their potential to support protected species and species of conservation concern. Any evidence suggestive of protected species being present on-site was noted throughout the course of the survey. The survey was carried out in reference to CIEEM 2017, UK Habitat Classification 2023 and BS 42020:2013 *Biodiversity – Code of Practice for Planning and Development* (BSI 2013).

Habitats on site were assessed to determine whether habitats present are listed under Section 41 Natural Environment and Rural Communities (NERC) Act, (2006), Priority Habitats UK's listed within the National Biodiversity Strategy and Action Plan (2024), habitats of local priority for conservation such as those that pertain to Local Biodiversity Action Plan (LBAP), or if there are any qualifying features that may justify further designation such as non-statutory designated site inclusions (SINC/ LWS/ SNCI).

Schedule 9 of the Wildlife and Countryside Act 1981 provides a list of non-native invasive species, which essentially prohibits the introduction or accidental introduction/spread of these species into the wild in Great Britain. Examples include Japanese knotweed *Fallopia japonica*, Himalayan balsam *Impatiens glandulifera* and giant hogweed *Heracleum mantegazzianum*. Where observed, such species were noted during the survey.

Protected Species and Species of Conservation Concern:

Species taken into consideration included those listed under;

- Section 41 The NERC Act 2006;
- Species lists such as those of local priority and conservation interest, e.g. ones listed within Local Biodiversity Action Plans (LBAP);
- International Union for Conservation of Nature (IUCN);
- Species of Conservation concern (listed as Red, Amber, Near Threatened or Data Deficient or otherwise listed in a Red Data Book if taxonomic group updated assessments have not been undertaken);

- Species listed within the Species Status Project Reviews, such as those that have been listed as Nationally Rare or Nationally scarce.

Bats:

The assessment of the suitability of structures (if present) for roosting bats was based on current guidance set out by the Bat Conservation Trust⁷.

The assessment comprised a Daytime Bat Walkover survey of the Site for its potential to provide roosting features for bats (if appropriate). The focus of attention was to determine if the habitat features onsite form part of foraging and flight-path networks for local bat populations. Photographs were taken of the Site, including the hedgerows and immediate habitat surroundings. Structures (if present) were assessed on a five-point scale (1-5) for their potential as roost sites (where 1 = High potential, 2 = Moderate potential, 3 = Low potential, 4 = Negligible potential, 5 = No potential (Collins et al, 2023)). The assessment was made according to the criteria set out in Table 2. Habitat was also assessed and made according to the criteria set out in Table 3.

The survey concentrated on looking for signs and evidence of bat usage as follows:

- Live and/or dead bats,
- Chattering and squeaking sounds (social calls) heard,
- Droppings,
- Feeding remains (e.g. butterfly or moth wings, beetle wing cases),
- Bat-fly (Nycteribiid) pupal cases,
- Perch abrasions,
- Characteristic staining from urine,
- Marks from oil secretions.

Table 2 – Roosting potential suitability in reference to presence of roosting and habitat features. (Collins et al, 2023).

<u>Suitability</u>	<u>Description of roosting habitats</u>	<u>Number of activity survey visits required</u>
None	POINT SCALE: 5 There are no habitat features on site likely to be used by any roosting bats at any time of the year.	None
Negligible	POINT SCALE: 4 There are no noticeable habitat features on site likely to be used by roosting bats.	None
Low	POINT SCALE: 3 The structure in question provides one or more potential roost sites that could be used by individual bats, on an opportunistic basis, at any time of the year.	One, in the period May to August

⁷ Collins, J. (ed.) (2023). Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th Edition). The Bat Conservation trust, London; Mitchell-Jones A. and McLeish A. (2004). Bat Workers Manual (3rd Edition). Joint Nature Conservation Committee, Peterborough; ell-Jones A. (2004). Bat Mitigation Guidelines. English Nature, Peterborough.

Moderate	POINT SCALE: 2 The structure in question provides one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions, and surrounding habitat, but are unlikely to support a roost of high conservation status.	Two, in the period May to September with at least one of the surveys between May and August
High	POINT SCALE: 1 The structure in question provides one or more potential roost sites that are obviously suitable for use by possibly significant numbers of bats on a recurring basis and if the conditions are appropriate, potentially for longer periods of time due to their size, shelter, protection, conditions, and surrounding habitat. These structures have the potential to support roosts of high conservation status.	Three, in the period May to September, with at least two of the surveys between May and August
Confirmed	POINT SCALE: 0 Evidence of bats or use by bats found during the Daytime Bat Walkover, usually found during the external or internal inspection.	Minimum of two surveys to characterise the roost in the period May to September, with at least one of the surveys between May and August

Table 3 – Summary of guidelines for assessing the suitability of surrounding bat habitat (Collins et al, 2023).

<u>Suitability</u>	<u>Description of commuting and foraging habitats</u>
None	No habitat features on site likely to be used by commuting or foraging bats at any time of the year.
Negligible	No key and/or apparent habitat features on site likely to be used as foraging resources or associated flightpaths.
Low	Habitat is generally isolated but may possess a few features that could be used by small numbers of bats, such as flightpaths, e.g. gappy hedgerow.
Moderate	The concerned habitat is continuous and usually connected to the wider landscape that could be used by bats for flightpaths such as treelines, well developed scrub or linked back gardens.
High	The concerned habitat is usually high-quality habitat that is well-connected to the wider landscape that is likely to be used regularly by bats for flightpaths such as river valleys, streams, hedgerows, lines of trees and woodland edge.

If appropriate, a Ground Level Tree Assessment (GLTA) for trees was also undertaken if trees with potential suitability were identified on-site. The purpose of this is to ascertain and locate Potential Roosting Features (PRF) on the exterior of the trees (for example, woodpecker holes). The criteria applied to this assessment is outlined as follows:

- PRF – I: PRF(s) only suitable for individual bats or a very small number of bats, either due to their size or a lack of suitable surrounding habitats.
- PRF – M: suitable for multiple bats and could be used by a maternity colony.

An assessment was also undertaken to classify the surrounding habitats suitability for commuting, foraging and roosting bats. This survey was in direct reference to methods recommended in the Bat Conservation Trust Survey Guidelines, 2023⁸.

Badgers:

A search within the Site, which extended across a 30m buffer around the site perimeter where accessible, was undertaken. Where present, the locations of badger evidence, such as runs, setts, latrine, prints, hair, scratching posts, and/or foraging signs such as snuffle holes were noted. The survey considered the Badger Trusts 'Badger Protection: Best Practice Guidance for Developers, Ecologists and Planners (England)'⁹.

Birds:

All bird observations and calls were noted during the survey. Features that could be utilised by nesting birds were also noted, and potential suitability for Schedule 1 listed birds, under the Wildlife and Countryside Act 1981 (as amended), were assessed.

Dormice:

Dormice are small, nocturnal mammals which make use of habitats such as hedgerows, scrub and rich mosaics such as woodland complexes. The dormouse requires a good linear network which is well connected with a good range of food sources such as fruit, nuts, flowers (notably petals) or insects. Notable favourites for the species include hazel, bramble, oak and honeysuckle, but they will utilise other species such as hawthorn, hornbeam, blackthorn, sweet chestnut and sycamore in the network's composition.

Great Crested Newts:

Features on-site, and where appropriate off-site, were assessed for their potential to support great crested newt. The Great Crested Newt Conservation Handbook (Frog life 2001) and Herpetofauna Workers' Manual (Joint Nature Conservation Committee, 2003) were referred to. Aerial maps and Ordnance survey maps were utilised to determine whether any waterbodies within 500m of the site could be used by the species and thus have relevance to the site boundary in terms of terrestrial supporting habitat.

Reptiles:

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

⁹ Anon. (2023), *Badger Protection: Best Practice Guidance for Developers, Ecologists and Planners*, Badger Trust, Brighton.

Features on-site were assessed for their suitability for reptiles. Features relevant to reptiles' ecological lifecycle depending on the time of year were assessed and noted, with particular consideration given to the Reptile Management Handbook (Edgar, Foster & Baker, 2011) and the Reptile Mitigation Guidelines Technical Note TIN 102 (Natural England, 2013).

Water voles:

Features (in this instance) were assessed for their suitability for water voles. Features relevant to water voles ecological lifecycle depending on the time of year were assessed and noted, with particular consideration given to the Water Vole Mitigation Handbook (Dean, M., Strachan, R, Gow, D. and Andrews R (2016)).

Other species:

Other species considerations were noted where appropriate habitat suitability was present or otherwise ruled out where no potential features were found that could be utilised by a species(s).

4. Limitations

4.1 Survey Limitations

The field survey that informs this report is a snapshot of the ecological features and evidence onsite at a specific time of year and is informed by the information obtained during the site visit for a particular period. It cannot be ruled out that important ecological features may be missed due to survey timings, unusual climate events that can disrupt ecological cycles, or the year of the survey. Every effort has been taken to ensure the advice provided within this report is balanced and in depth, but a lack of evidence for protected species does not always mean a likely absence.

The site visit was undertaken following a period of heavy rainfall. Such conditions can reduce the detectability of certain ecological features and species, including field signs, ground flora, invertebrates, reptiles and mammal activity. Heavy rain can also obscure or wash away evidence such as tracks, droppings and burrows, and may temporarily alter habitat conditions and water levels. As a result, there is a possibility that some ecological features or species presence may not have been identified during the survey, and the findings should be interpreted with an appropriate degree of caution.

Bats are very small animals, capable of accessing small spaces, and it is possible that bats, or their signs, might have been missed during the survey if they are normally present opportunistically or in small numbers for a short period of time each year. Not all features in trees or buildings suitable for use by bats are visible from the ground, and there can be no external evidence of use; consequently, it is only possible to make a best effort when carrying out such a survey.

At the time of writing, the final redline boundary and design layout had not yet been confirmed. As a result, the calculated areas of each habitat within the redline and blue line boundaries may be subject to minor change. However, the entirety of the blue line boundary has been surveyed for completeness.

These limitations have been taken into consideration in the conclusions and recommendations following the assessment.

Please Note: L1 is classified as a Line of Trees (UK Habitat Code 33). Although the feature exceeds 20 m in length (c. 68 m) and locally exceeds 5 m in width at the base in isolated sections, it functions as a distinct linear feature separating the site's grassland (TN1) to the south from Park Street to the north. The treeline is considered to have been originally planted to demarcate a linear ownership boundary. The canopy exceeds 2 m in height, with open habitat present on both sides, including wood pasture and parkland beyond Park Street to the north. Its narrow, elongated form and clear boundary function support classification as a line of trees rather than an alternative habitat type.

The UKHab guidance states that habitat types should normally be recorded as either 'Area' or 'Line' spatial features, with 'Point' features reserved for situations where a habitat is too small to be appropriately captured as an area or line, or where its nature necessitates point recording (e.g. individual trees). While the guidance allows for flexibility in exceptional circumstances, it is explicit that point data carries significantly less ecological information and should not be used as a substitute for area or line features.

In this instance, although the feature does not meet all quantitative criteria typically associated with a line of trees, it is spatially linear in form and function and is clearly better represented as a linear habitat feature than as an area or point. Recording the feature as a line of trees therefore provides a more accurate and proportionate representation of its ecological character, extent, and potential function within the wider landscape, and is considered the most appropriate interpretation in accordance with the intent of the UKHab guidance.

Tree T1 has been recorded as an Individual Tree – Rural Tree (UK Habitat Code 32) rather than as part of the treeline, as it is located on the opposite side of a brick wall separating it from L1 and is clearly offset from the alignment of the remaining trees.

5. Results

5.1 Desk Study and Local Policy and The Law

Local Plan Policies & strategies

The unitary authority now known as Wiltshire Council became existent on the 1st of April 2009. The new unitary council combined the four former district councils in Wiltshire (Salisbury, West Wiltshire, Kennet, and North Wiltshire) alongside the services provided by the former Districts.

Wiltshire Core Strategy, adopted in January 2015, is the principle planning framework guiding development across Wiltshire. Within that strategy, **Core Policy 50: Biodiversity & Geodiversity**, sets out how biodiversity and geological interests must be incorporated into planning decisions throughout the country. It is currently undergoing a 'Local Plan Review'. Wiltshire Council has not issued its published response to the to Inspectors'

Post Hearing Letter. It is anticipated that the Local Plan will be adopted in 2026

Policy CP50: Biodiversity and Geodiversity

'Protection:

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

All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development. Any development potentially affecting a Natura 2000 site must provide avoidance measures in accordance with the strategic plans or guidance set out in paragraphs 6.75-6.77 above where possible, otherwise bespoke measures must be provided to demonstrate that the proposals would have no adverse effect upon the Natura 2000 network. Any development that would have an adverse effect on the integrity of a European nature conservation site will not be in accordance with the Core Strategy.

Biodiversity enhancement:

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

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.'

Core Policy 69 Protection of the River Avon SAC

'In order to avoid and reduce potential environmental effects on the River Avon SAC, development will need to incorporate measures during construction and operation to avoid and prevent pollution and mitigate potential disturbance effects; appropriate measures may include consideration of suitable buffer zones along watercourses, habitat enhancements and river access management measures. All development within 20m of the river banks should submit a construction management plan to the local planning authority to ensure measures proposed during construction are satisfactory.

Where additional sewage discharges to a STW cannot be accommodated without measures to offset phosphate loading, development will be required to undertake proportionate measures (which may include contributions towards those measures identified in the Nutrient Management Plan) to demonstrate that the proposals would have no adverse effects upon the SAC'

Wiltshire and Swindon Local Nature Recovery Plan was published in 2025 and provides a clear framework to reserve biodiversity decile and build resilience across the county's landscapes. It prioritises nine mapped priority habitats that are of BNG Strategic Significance including:

- Calcareous Grassland
- Neutral Grassland
- Woodland
- Heathland, Acid Bogs and Acid Grassland,
- Mixed Habitats
- Open Mixed Habitats
- Rivers, Streams and Wetlands
- Chalk Rivers
- Nature on Our Doorstep

Additionally, the following mapped priority species that are not of BNG Strategic Significance include:

- Bats
- Farmland birds
- Great bustard
- Lapwing and Stone-curlew
- Eurasian Curlew
- Wart Biter Bush Cricket
- Duke of Burgundy Butterfly
- Juniper
- Arable Plants

Wiltshire's Local Biodiversity Action Plan Prioritises the following listed habitat types and networks:

- **Woodland:** This includes ancient woodland and wood-pasture/parkland
- **Arable Farmland:** This focuses on specific needs of arable fields for biodiversity
- **Wet Habitats:** Broadly, this comprises of reedbeds, fen and marsh, and wet grassland
- **Hedgerows:** Hedgerows of varying types are included, with action plans specifically addressing the conservation and management of these
- **Scrub:** Action plans to protect and manage scrub habitats
- **Acid and Calcareous Grassland:** This addresses these particular grassland types
- **Open Water:** Broadly, includes lakes, reservoirs, and other water bodies
- **Field Margins, Churchyards, Gardens:** Often overlooked, the plan focuses on these
- **Lowland Heathland:** Action plans are delineated for this specific type of habitat
- **Other Semi-Natural Habitats:** The Plan Recognises the importance of various semi-natural habitats for biodiversity

In Wiltshire, Local Priority species are those that have been determined as vulnerable or declining and therefore in need of focused conservation interventions. These include the water vole *Arvicola amphibius*, hedgehog *Erinaceus europaeus*, common toad *Bufo bufo*, curlew *Numenius Arquata*, Duke of Burgundy butterfly *Hamearis lucina*, and reintroduced Great Bustard *Otis tarda*. The Wiltshire Wildlife Trust has identified these species as critically important and has developed resources to support their conservation.

Ecological Context	The Site consists of g4 – Modified Grassland, u1f – Sparsely Vegetated, 32 – Individual Trees, and is bordered by 33 – Line of Trees. The Site is located within a semi-rural setting on the eastern edge of Heytesbury village. Park Street forms the northern boundary of the red line area. To the east, the Site adjoins agricultural land, which was observed to be grazed by sheep at the time of the site visit. This field is separated from the Site by a h2a - native hedgerow, bordered on both sides by stock-proof post-and-wire fencing. The hedgerow lies outside the applicant's ownership and is therefore not included within the red or blue line boundaries. The Site is bordered by residential properties with sizable garden plots. Dwellings are located immediately west along Mantles Lane and Old Forge Close. The River Wylye lies approximately 60m to the south-west of the red line boundary. The site at Land South of Park Street, Heytesbury lies within a predominantly rural landscape characterised by agricultural land, improved grassland, and scattered hedgerows and treelines typical of the Wylye Valley and wider south Wiltshire chalk landscape. The surrounding area comprises a mosaic of pastoral farmland, parkland and small woodland blocks, with semi-natural habitats becoming more frequent beyond the immediate settlement edge. The River Wylye and associated floodplain habitats occur nearby and contribute to local ecological connectivity, while the surrounding chalk downland supports a landscape of moderate to high ecological value. Within this context, the site forms part of the rural-settlement interface and is influenced by both managed agricultural land and semi-natural habitats in the wider countryside.
Statutory & Non-statutory Designated Sites	The desk study revealed that the Site does not sit within any Statutory Designated Sites, and four lie within 2km, namely River Avon SAC and River Avon System SSSI, Cranborne Chase and West Wiltshire Downs National Landscape, and Scratchbury and Cotley Hills SSSI. River Avon SAC and River Avon System SSSI 70 m South As advised by Wiltshire Council's County Ecologist, <i>'This development falls within the catchment of the River Avon SAC. The development therefore has potential to cause adverse effects alone or in combination with other developments through discharge of phosphorus in wastewater. An Appropriate Assessment (AA) under Section 63 of the Habitats Regulations must be carried out by the relevant Competent Authority (the LPA) to determine the potential significant effects and the suitability of any measures proposed to avoid or mitigate those effects.'</i>

The County Ecologist also advised in their pre-app response that *'The site lies 70m north of the River Avon System SSSI. Potential loss of or degradation of habitat within the SSSI as an indirect effect of the potential development will require suitable mitigation. It is vital that such impacts are assessed and where necessary a proposal for mitigation and enhancement included in any planning application at this site.'*

As advised in Wiltshire Council's guidance document *'Protecting the River Avon SAC / SSSI'*¹⁰, hazards associated with the deteriorating status of this feature comprise of;

- Siltation (Silt/mud/clay particles are deposited in the water, making it 'muddy')
- Nutrient enrichment (Water is "fertilized" causing increased plant growth and accumulation of organic matter that can degrade water quality)
- Toxic contamination (poisonous chemicals enter the river system directly or indirectly)
- Physical changes (Permanent habitat loss or fragmentation of habitat. Temporary damage to bankside or river vegetation could result in loss or disturbance of habitats if works are poorly timed)
- Drainage (Increased flood risk and interference with natural flow. Impervious surfaces may generate large pulses of potentially contaminated runoff, causing flooding and scouring problems. Large impervious areas may also reduce groundwater recharge.)
- Disturbance (Disturbance to flora & fauna may affect their distribution, breeding success and ultimately survival).
- Groundwater flows (Water flowing beneath the surface of the ground).

The River Avon SAC and System SSSI is of national and international importance for its exceptional biodiversity. It comprises a complex network of chalk and mixed-geology rivers and tributaries supporting over 180 aquatic plant species, one of the most diverse fish assemblages in Britain, and a rich invertebrate fauna. The system supports several internationally rare and protected species, including *Ranunculus* river vegetation, Atlantic salmon, sea and brook lamprey, bullhead, and Desmoulin's whorl snail.

Associated habitats such as swamp, wet woodland, and species-rich floodplain grasslands are now rare and provide critical value for invertebrates, birds, and mammals. The river corridor supports notable bird populations (e.g. kingfisher, warblers), an

¹⁰ <https://www.wiltshire.gov.uk/media/993/Protecting-the-River-Avon-SAC/pdf/Protecting-river-avon-sac-biodiversity.pdf?m=637183939031430000> (accessed February 2026)

exceptionally diverse fish community, and protected mammals including water vole, water shrew, and otter.

This development falls within the catchment of the River Avon SAC.

The principles of nutrient neutrality in Wiltshire are that where a proposal is deemed to be a 'phosphate affected development', it must be demonstrated that the adverse effect on the integrity of the protected site can be ruled out by achieving 'nutrient neutrality' i.e. resulting in there being no net increase in phosphorus from the change of land use and/or discharged foul wastewater effluent from associated overnight accommodation.

The nature of the proposals will provide overnight accommodation; therefore, the development has the potential to result in an adverse effect alone or in combination with other developments through the discharge of phosphorus into the surface water and general fluvial catchment.

Therefore, further consultation with Natural England will be required. An Appropriate Assessment under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) must be undertaken by the Competent Authority (in this case, Wiltshire Council) to determine the potential significant effects and the suitability of any measures proposed to avoid or impact potential effects.

It is considered that issues pertaining to nutrient enrichment and drainage will be addressed in regard to satisfying matters pertaining to nutrient neutrality requirements. However, in regard to other considerations highlighted above, no floral or faunal features were identified within the site boundary, and it is considered due to the small-scale of the proposals and the distance from the designated feature, that no likely detrimental impacts will occur as a result of the proposals.

Cranborne Chase and West Wiltshire Downs National Landscape 70 m South

'Cranborne Chase is a National Landscape, a designated Area of Outstanding Natural Beauty, and covers 380 square miles of countryside, overlapping the boundaries of Wiltshire, Dorset, Hampshire and Somerset.

It is a diverse natural landscape with a rich archaeological and historical significance. Cranborne Chase offers areas of rare chalk grasslands, scientifically important ancient woodlands, and chalk escarpments. The

downland hillsides and chalk river valleys have a distinct and recognisable character.

The primary purpose of the National Landscape designation is to conserve and enhance the natural beauty of the area – now and for future generations.'

Scratchbury and Cotley Hills SSSI 682 m Northwest

'This is a chalk grassland site south-east of Warminster, supporting a rich flora and an outstanding associated butterfly fauna. Unimproved grassland covers a long warm south to west facing slope, and the earthworks of the Iron Age Scratchbury Hillfort. The turf is dominated by sheep's fescue *Festuca ovina*, red fescue *F. rubra* and upright brome *Bromus erectus*. Characteristic herbs of the Wiltshire downland include devil's bit scabious *Succisa pratensis*, saw-wort *Serratula tinctoria* and chalk milkwort *Polygala calcarea*. Plants with a nationally restricted distribution are early gentian *Gentianella anglica*, bastard-toadflax *Thesium humifusum* and field fleawort *Senecio integrifolius*. Orchids are well represented with, among others, frog orchid *Coeloglossum viride*, fragrant orchid *Gymnadenia conopsea* and autumn lady's tresses *Spiranthes spiralis*. Meadow saxifrage *Saxifraga granulata* occurs on the earthworks of the Hillfort. The vegetation is similar to the sheep's fescue dwarf sedge *Festuca ovina* *Carex humilis* grassland type, which is well distributed along the Wylde Valley a few miles to the south. Dwarf sedge is absent, however, making the site of potential value for comparative ecological studies. A lush more mesotrophic grassland occurs on level ground within Scratchbury Hillfort, probably reflecting past agricultural improvement. Areas of hawthorn and elder scrub occur, particularly along the lower slopes of the downland. These provide valuable shelter for invertebrates on an otherwise open and exposed site. There is a small clump of mature planted beech and pine below Cotley Hill. The site is of high entomological interest, with an outstanding assemblage of 29 resident breeding species of butterfly recently recorded. The horseshoe vetch *Hippocrepis comosa* is locally plentiful, supporting both the chalkhill blue *Lysandra coridon* and adonis blue *Lysandra bellargus* butterflies. The adonis blue colony is well established, having been recorded from the site for more than 20 years. Other noteworthy species are the Duke of Burgundy *Hamaeris lucina*, grizzled skipper *Pyrgus malvae*, dark green fritillary *Argynnis aglaja* and small blue *Cupido minimus*. Other insect groups are less well surveyed, but several uncommon species have been noted. These include six species of weevil *Curculionoidea*, eight species of plant bugs *Hemiptera* and *Homoptera*, and two species of Chrysomelid beetle, *Apthona herbigrada* and *Mantura matthewsii*, both of which feed on rock rose *Helianthemum*. Day flying moths recorded include the wood tiger *Parasemia plantaginis* and the scarce

forester Adscita globulariae, a species documented as rare in the British Invertebrate Red Data Book.'

Site lies within the River Avon System and Scratchbury and Cotley Hills SSSI impact zones; consultation is required with Natural England if development types fit one or more of the following criterion:

- **Infrastructure:** Pipelines and underground cables, pylons and overhead cables (excluding upgrades and refurbishment of existing network). Any transport proposal including new or extended footways, cycleways, roads/car parks, railways and waterways (excluding routine maintenance). Airports, helipads and other aviation proposals.
- **Wind and Solar:** Wind turbines.
- **Minerals, Oil and Gas:** Planning applications for quarries, including: new proposals, Review of Minerals Permissions (ROMP), extensions, variations to conditions etc. Oil & gas exploration/extraction.
- **Rural Non-Residential:** Large non-residential developments outside of existing settlements/urban areas where the net additional gross internal floorspace is > 1,000m² or the footprint exceeds 0.2ha.
- **Residential:** Residential development of 50 units or more.
- **Rural Residential:** Any residential development of 10 or more units outside of existing settlements/urban areas.
- **Air Pollution:** Any development that could cause AIR POLLUTION or DUST either in its construction or operation (including: industrial/commercial processes, livestock & poultry units, slurry lagoons/manure stores).
- **Combustion:** All general combustion processes. Incl: energy from waste incineration, other incineration, landfill gas generation plant, pyrolysis/gasification, anaerobic digestion, sewage treatment works, other incineration/combustion.
- **Waste:** Mechanical and biological waste treatment, inert landfill, non-hazardous landfill, hazardous landfill, household civic amenity recycling facilities construction, demolition and excavation waste, other waste management.
- **Compost:** Any composting proposal. Incl: open windrow composting, in-vessel composting, anaerobic digestion, other waste management.
- **Discharge:** Any discharge of water or liquid waste that is discharged to ground (ie to seep away) or to surface water, such as a beck or stream.
- **Water Supply:** Any development needing its own water supply eg remote rural housing that is not connected to a mains water supply, OR large infrastructure such as

	warehousing/industry where the total net additional gross internal floorspace following development is > 1,000m². The proposals do not meet any of the above criteria. Therefore, consultation with Natural England in relation to impact risk zones is not expected to be required. Salisbury Plain Special Protection Area (SPA) The County Ecologist advised in their pre-app response that the 'application lies within the 6.4km buffer zone of the Salisbury Plain SPA and in light of the HRA for the Wiltshire Core Strategy and the HRA for the Wiltshire Housing Site Allocations Plan it is screened into Appropriate Assessment due to the potential impact of recreational pressure on stone curlew in combination with other plans and projects. That Appropriate Assessment reached a conclusion of no adverse effects on site integrity for development within 6.4km of the SPA boundary provided that the mitigation scheme continues to be implemented. Annual stone curlew monitoring and protection measures continue to be secured by the Council. In March 2025 Natural England (NE) confirmed that the 2024 Appropriate Assessment for Salisbury Plain continues to be supported by NE. Use the following link for further information in relation to Salisbury Plain SPA: https://www.wiltshire.gov.uk/media/994/Salisbury-Plain-SPA-HRA-and-mitigationstrategy/'pdf/Salisbury-plain-spa-hra-and-mitigation-strategy-2018-reviewfinal.pdf?m=1582797145997 <u>Special Areas of Conservation or Component Sites of Special Scientific Interest (Bats):</u> There are no Special Areas of Conservation (SAC) associated with bats within 5km of the site. Therefore, consultation with Natural England is not considered necessary.
Habitats	<u>The Law</u> There is a list of habitats and species, noted as such by their principal importance in England. This includes 56 habitats and 943 species. These were originally highlighted as priority habitats and species in the UK Biodiversity Action Plan (UK BAP)¹¹. The publication of this list is a legal duty under Section 41 of the Natural Environment and Rural Communities (NERC) Act. A desk study using the Multi-Agency Geographic Information for the Countryside (MAGIC) shows that there are no Priority Habitats

¹¹ <https://jncc.gov.uk/our-work/uk-bap/>

	located on the site. The nearest known Priority Habitat lies approximately 10 metres north of the Site, which is identified as wood-pasture and parkland. Priority habitats within 2km of the Site include: • Wood-pasture and Parkland • Traditional Orchard • Deciduous Woodland • Lowland Calcareous Grassland • Coastal and Floodplain Grazing Marsh Blanket bog, Lowland fens, Limestone pavements, Coastal sand dunes, Ancient woodland, Ancient trees and veteran trees, Spartina saltmarsh swards and Mediterranean saltmarsh scrub are defined as 'irreplaceable' habitats and receive strong protection through the National Planning Policy Framework (NPPF). More recently, their protection is further strengthened by the Biodiversity Net Gain (BNG) policy, specifically associated with Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024. There are no habitats defined as 'irreplaceable' within 2km of the site. The proposals are located far enough away from the Priority and Irreplaceable Habitat to conclude that no impact is foreseen. The Local Nature Recovery Strategy for Wiltshire and Swindon prioritises nine mapped priority habitats that are of BNG Strategic Significance, including: • Calcareous Grassland • Neutral Grassland • Woodland • Heathland, Acid Bogs and Acid Grassland, • Mixed Habitats • Open Mixed Habitats • Rivers, Streams and Wetlands • Chalk Rivers • Nature on Our Doorstep None of the above habitats sit within the Site boundary.
Amphibians	<u>The Law</u> Great crested newts, and natterjack toads, are protected under The Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended). It is an offence to: - Deliberately capture, injure or kill a great crested newt or natterjack toad

- Intentionally or recklessly disturb a great crested newt or natterjack toad
- Intentionally or recklessly obstruct access to any structure or place which a great crested newt or natterjack toad uses for shelter or protection
- Damage or destroy a breeding site or resting place.

Species of principal importance in England include great crested newt, pool frog, natterjack toad and common toad.

Findings

A desk study using the Multi-Agency Geographic Information for the Countryside (MAGIC) website shows that there are no records confirming the presence of great crested newt within 2km of the site. In addition, no European Protected Species Class Survey Licence Returns for the species were identified within 2km.

The majority of the redline boundary (the east side of the site) lies within a Green Risk Zone, while a small section (the west side) lies in an Amber Risk Zone for great crested newt. Green Zones contain sparsely distributed records and are less likely to contain important pathways of connecting habitat for the species. Amber Zones indicate regions where the species is likely to be present, with suitable habitat and potential dispersal routes. This indicates a moderate risk of development impacting the newt population.

The west of the site lies within a Core Great Crested Newt Strategic Opportunity Area. The east lies within a fringe Great Crested Newt Strategic Opportunity Area.

A review of OS maps identified two ponds within 250m of the Site.

The Great Crested Newt Mitigation Guidelines (2001) states that the species can be capable of commuting up to 500m from their ponds during their terrestrial phase; however, these distances for such migration are energetically expensive, very dangerous and only considered necessary where there is a scarcity of habitats within the locality. English Nature (2004) published that most individuals will only travel within 100m of their pond, and few migrate beyond 200m. In addition, there are several intervening barriers comprising the River Wylye, footpaths, roads and residential development between the ponds and the Site, which will likely deter migration to the Site.

The County Ecologist Advised in their pre-application response that *'the applicant intends to enter Wiltshire's District Wide Great Crested Newt Mitigation Licence scheme. There are two ponds and other water features within 150 m to the southwest of the*

	site, creating potential for destruction or disturbance of Great Crested Newts and their habitat. As a European Protected Species, if GCN are found within 500 m of the site, significant mitigation may be required. Wiltshire operates the Natural England GCN District Level Licensing Scheme, and the applicant's participation in this scheme would address these requirements. The consultant ecologist can advise on the merits of the scheme in relation to any application at this site.' There are also other ephemeral or flowing ditches within 500m; however, these are not suited to amphibians.
Badgers	<u>The Law</u> Badgers and their setts are protected under the Protection of Badgers Act 1992. Under this legislation, it is an offence to; - Take, injure, or kill a badger - Treat a badger cruelly - Interfere with a badger sett - Possess or control a live badger - Mark or ring a badger - Damage or destroy a badger sett - Obstruct access to a badger sett - Disturb a badger when it is occupying a sett The County Ecologist Advised in their pre-application response that there are records of badger within the local area.
Bats	<u>The Law</u> All bat species are protected under The Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended). Under this legislation, it is an offence to: - Deliberately capture, injure or kill bats - Intentionally or recklessly disturb bats; or under the habitat regulations deliberately disturb in a way that would affect their local distribution or abundance, or affect their ability to survive, breed or rear young - Intentionally or recklessly obstruct access to any structure or place which bats use for shelter or protection - Damage or destroy a breeding site or resting place. - Possess, control, transport, sell, exchange or offer for sale/exchange any live or dead bat or any part of a bat Bat species of principal importance include:

	- Greater horseshoe bat - Lesser horseshoe bat - Greater mouse-eared bat - Bechstein's bat - Barbastelle - Common pipistrelle - Soprano pipistrelle <u>Findings</u> A desk study using the Multi-Agency Geographic Information for the Countryside (MAGIC) website shows that there has been three European Protected Species licences issued within 2km of the Site, specifically pertaining to bats. The closet licence for the species was issued approximately 1.6 km to the north of the Site, for common pipistrelle. The County Ecologist Advised in their pre-application response that there <i>'is a recorded bat roost 250m southwest of the site, which suggests the potential for bat activity on site.'</i> Additionally, the County Ecologist Advised in their pre-application response that local records for lesser horseshoe and pipistrelle bat are known within the local area.
Birds	<u>The Law</u> All wild birds are granted legal protection under the Wildlife & Countryside Act 1981 (as amended). Under this legislation, it is an offence to: - Kill, injure or take any wild bird - Take, damage or destroy the nest of any wild bird while it is in use or being built - Take or destroy the egg of any wild bird Schedule 1 listed bird species under this Act are afforded further protections, making it illegal to disturb these species while building a nest, or if a nest contains eggs or young, or disturb dependent young. <u>Findings</u> A desk study using the Multi-Agency Geographic Information for the Countryside (MAGIC) website shows that the Site sits within the following Countryside Stewardship targeting areas: • Lapwing – Lapwings are listed on the UK Red list. They are listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended), which provides special protection for wild birds, their nests, eggs, and young. It's an offence to disturb them during nesting season. Lapwings require

	arable land, grazed pasture and wet features such as scrapes and flushes, which enhance a 'muddier' environment for invertebrates. Such habitats are not situated within the site boundary. The Site also sits within a sighting zone for: • Lapwing • Stone-curlew - Stone-curlew sighting area. They are listed on the UK Red list. They are listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended), which provides special protection for wild birds, their nests, eggs, and young. It's an offence to disturb them during nesting season. This species requires a mixture of arable farmland, grazed grassland as well as dry grassland compositions. Such habitats are not situated within the site boundary. • Grey Partridge - Grey Partridge, as listed under the Grassland Assemblage of Farmland birds. The species in the UK is identified as Red under the Birds of Conservation Concern 5: the Red List for Birds (2021). Priority Species under the UK Post-2010 Biodiversity Framework. Suitable habitats for the species are not present within the site boundary. • Corn Bunting - Corn Bunting are listed on the UK Amber list and receive protected under the Wildlife and Countryside Act 1981 (as amended), safeguarding them, including their nests and eggs, from intentional harm or disturbance. Suitable habitats for the species are not present within the site boundary. The County Ecologist Advised in their pre-application response that existing records for barn owl, kestrel and grey heron are known within the local area.
Flora & Invertebrates	<u>The Law – Flora</u> Many species of plant are afforded protection under The Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended). It is an offence to deliberately collect, pick, uproot, cut or destroy these plants. It is also an offence to possess, sell or exchange such a plant. Additionally, many of these species are also listed as species of principal importance. <u>The Law - Invertebrates</u> The Wildlife & Countryside Act 1981 affords protection to 45 invertebrate species. It is an offence to: - Intentional kill, injure or take such species - Deliberately damage or destroy a breeding site or resting place used by such species

	- Disturb such species when occupying a structure or place For eight species of invertebrate, the species and associated habitat(s) are afforded further protection under The Conservation of Habitats and Species Regulations 2017 (as amended). An additional 21 species benefit from partial protection. Nearly 400 species of invertebrate are included as species of principal importance. <u>Findings</u> A desk study using the Multi-Agency Geographic Information for the Countryside (MAGIC) website shows that there have been no European Protected Species licences issued within 2km of the Site. The Site does not sit within any priority, targeted or conservation areas pertaining to invertebrates.
Hazel Dormice	<u>The Law</u> Hazel Dormice are protected under The Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended). Under this legislation, it is an offence to: - Deliberately capture, injure or kill a dormouse - Intentionally or recklessly disturb dormice - Intentionally or recklessly obstruct access to any structure or place which a dormouse uses for shelter or protection - Damage or destroy a breeding site or resting place - Possess, control, transport (alive or dead) Dormice are also listed as a species of principal importance. <u>Findings</u> A desk study using the Multi-Agency Geographic Information for the Countryside (MAGIC) website shows that there has been one European Protected Species licences issued within 2km of the Site, approximately 1.1 km to the west of the site.
Otter	<u>The Law</u> Otters are protected under The Conservation of Habitats and Species Regulations 2017 (as amended) and Wildlife and Countryside Act 1981 (as amended). Under this legislation, it is an offence to:

	• Kill, injure, or capture an otter • Harass an otter • Disturb an otter while it is caring for its young or in its resting place • Damage or destroy an otter's resting place or breeding site • Obstruct access to an otter's resting place or breeding site • Possess, control, or transport an otter, alive or dead
Reptiles	<u>The Law</u> Smooth snakes and sand lizards are protected under The Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended). Under this legislation, it is an offence to: - Deliberately capture, injure or kill a smooth snake or sand lizard - Intentionally or recklessly disturb a smooth snake or sand lizard - Intentionally or recklessly obstruct access to any structure or place which a smooth snake or sand lizard uses for shelter or protection - Damage or destroy a breeding site or resting place - Advertise sale, barter, exchange, transport for sale and/or advertise to sell or buy a reptile Slow worm, grass snake, adder and common lizard are protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) against killing, injury and sale. <u>Findings</u> A desk study using the Multi-Agency Geographic Information for the Countryside (MAGIC) website shows that there have been no European Protected Species licences issued within 2km of the Site. The County Ecologist Advised in their pre-application response that local records for common lizard are known within the local area.
Water Vole	<u>The Law</u> Water voles are protected under The Wildlife and Countryside Act 1981 (as amended). Under this legislation, it is an offence to intentionally: - Kill, injure or take them - Possess or control them (alive or dead)

	- Damage or destroy a structure or place used for shelter or protection - Disturb them in a place used for shelter or protection - Obstruct access to a place used for shelter or protection The County Ecologist Advised in their pre-application response that local records for water vole are known within the local area.
Other Notable Species	<u>The Law</u> Other species are identified as species of principal importance in England. Many species are required to be considered under National and often Local Planning Policies. Species of principal importance also include hedgehog and brown hare. Hedgehogs are listed with the following protections and considerations: • Red (IUCN) List mammal species • Have partial protection under the Wildlife and Countryside Act (1981) • Listed as priority species under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 • Hedgehogs are highlighted as a priority species under the UK Biodiversity Action Plan • The Countryside and Rights of Way (CROW) Act 2000 was established in light of dramatic population declines. The legislation afforded to hedgehogs in Act 2016 and National Planning Policy Framework (2024) enforces that public authorities must have due regard when exercising their functions to conserve biodiversity. 'Conserving biodiversity' is defined in relation to a living organism or type of habitat, and restoring or enhancing a population or habitat. Brown hare are listed with the following protections and considerations: • Protected in the UK under the Wildlife and Countryside Act, 1981 (as amended). Their protection under this act is limited during a closed season from February 1st to September 30th. During this period It is illegal to intentionally or recklessly kill, injure, or take a brown hare without a license • Brown hare are also a Priority Species under the UK Post-2010 Biodiversity Framework.

	<u>Findings</u> A desk study using the Multi-Agency Geographic Information for the Countryside (MAGIC) website shows that the Site does not sit within any other related protected species zones, such as Countryside Stewardship Targeting Areas. The County Ecologist Advised in their pre-application response that local records for polecat are known within the local area.
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5.2 Field Survey	
Statutory Designated Sites	No Statutory Designated Sites of such interest are located within or adjacent to the site boundary.
Site Description	Redline g4 – Modified Grassland, 0.475 ha, TN1 The dominant habitat within the site comprises g4 – Modified Grassland, in accordance with the UK Habitat Classification. The field is not currently subject to active grazing; however, evidence indicates it has been grazed historically over a prolonged period. The ground surface is uneven, likely reflecting past grazing pressure and localised disturbance associated with periods of excessive poaching. Following recent heavy rainfall, several shallow depressions supported localised areas of temporary standing water. Sward height across the site is variable, ranging from approximately 5 cm to 60 cm, although the majority of the grassland is characterised by a short sward of approximately 5 cm. Taller vegetation is restricted to discrete patches and is dominated by tall forbs (16), including common dock) and common nettle. The grassland is species-poor, with limited herbaceous diversity and an average recorded species richness of approximately four vascular plant species per m². A small number of flowering species of value to invertebrates were recorded, including <i>Ranunculus repens</i> (creeping buttercup) and <i>Leucanthemum vulgare</i> (oxeye daisy); however, the sward lacks a diverse assemblage of positive indicator species typically associated with semi-natural grassland habitats.

Overall, the modified grassland is considered to be of low ecological value, consistent with its classification and species composition. Nevertheless, it forms part of the wider green infrastructure of the site and may provide limited foraging opportunities for common and generalist bird species, as well as widespread invertebrates.

Average Species-richness: 4 per meter²

Species	Quadrat 1	Quadrat 2	Quadrat 3	Quadrat 4	Quadrat 5
Common nettle	R	-	-	-	-
Cock's-foot	D	A	D	A	F
Common dock	-	R	-	R	-
Creeping buttercup	-	F	-	O	-
False oat grass	-	O	-	-	-
Narrow leaved ribwort plantain	-	-	-	A	-
Oxeye daisy	-	-	-	-	O
Perennial rye grass	-	-	-	-	F
Common dandelion	-	-	-	R	-
Germander speedwell	-	-	-	-	R
Dove's-foot crane's bill	-	-	-	-	R

33 - Line of Trees, 0.048 km, L1

Along the northern boundary of the site, a linear tree belt forms a vegetated buffer between TN1 and Park Street. Immediately to the south of this tree line, an old brick wall, extensively colonised by ivy (*Hedera helix*), runs parallel to the trees and creates a clearly defined boundary between the woodland edge and the adjacent modified grassland.

The tree line comprises a mixed assemblage of predominantly mature broadleaved species, including *Acer pseudoplatanus* (sycamore), *Fraxinus excelsior* (ash), with occasional *Prunus* spp. and *Populus* spp., and a rare occurrence of *Aesculus hippocastanum* (horse chestnut). The majority of trees fall within the medium to large size classes and many trunks and lower branches are heavily colonised by ivy.

The tree line provides continuous canopy cover; however, its ecological connectivity is limited, as it is truncated at both its eastern and western extents by residential development. As a result, the linear feature extends for approximately 170 m and is

relatively isolated, though, more light tolerant bat species may cross between linear features to utilise more extensive hedgerow networks which do extend off-site. Despite this fragmentation, the tree line is likely to function as a transient commuting and foraging feature for mobile species, including bats and birds, and provides structural diversity along the site boundary.

u1f – Sparsely Vegetated, 0.01 ha, TN2

The understory to the tree line is largely dominated by common ivy, with occasional occurrences of snowdrops. A considerable volume of deadwood and leaf litter is present on the ground beneath the canopy. There is also evidence of human disturbance, most notably litter likely discarded by members of the public passing the site from the adjacent road.

32 – Individual Trees, T1 (T8 in arb plan by NB Tree Management)

T1 is a hawthorn tree in the 'small' size class. T1 is situated immediately to the south of the brick wall, which forms a boundary between the TN1 grassland and the L1 treeline.

U1b – Urban – Developed Land, 0.0071 ha, ST

A former cesspit, now largely overgrown with grassland species, is proposed to be converted into a new septic tank.

Blueline

g4 – Modified Grassland, TN1

TN1 extends into the blue line boundary, where ground levels decrease slightly towards the River Wylfe, and a greater extent of temporary standing water was present at the time of survey resultant from recent heavy rain.

h3d – Bramble Scrub, TN3

Two areas of bramble scrub are present along the fence line in the south-western corner of the blueline boundary. These areas are limited in extent and relatively isolated; however, they provide a small degree of structural diversity within the site, offering potential refuge, as well as localised foraging opportunities for terrestrial mammals specialists as well as common invertebrates.

	T2 is situated along the western boundary of the site and comprises a 'small' size class ash. Adjacent to this tree, vegetation from the neighbouring property extends over the fence line and encroaches into the site. 33 - Line of Trees, L1 A continuation of the line of trees within the redline boundary. u1f – Sparsely Vegetated, TN2 A continuation of the sparsely vegetated land within the redline boundary.
Amphibians	Amphibians (and notably great crested newts) utilise an array of habitats including open woodland and associated fringes, grassland (varying in sward height, with a preference to rough grassland), hedgerows, scrub, field margins, allotments, gardens (particularly those with ponds), coastal sand dunes, lowland dry heath, log and stone piles, and even misplaced stockpiles, especially those that have been subject to vegetative overgrowth. The mosaic of the above, in part or entirely, is important for the yearly lifecycles of amphibians, for foraging, commuting, shelter and hibernation activities. Field survey No suitable aquatic breeding habitat is present within the site, and the majority of habitats offer limited suitability for amphibians. Although standing water was recorded during the survey, this was associated with recent heavy rainfall and is understood to be ephemeral, typically draining rapidly. The historically grazed, modified grassland provides limited humidity retention and little protection from predators or extreme weather. While some localised variation occurs within TN1 through scattered 16 – Tall Forbs, these areas do not provide the dense vegetation or leaf-litter microhabitats typically required for amphibian shelter and thermoregulation. TN2 offers comparatively greater suitability at a localised scale, with areas of leaf litter and dead wood creating damp, decomposing substrates that may provide occasional shelter or foraging opportunities. Similarly, the bramble scrub in the blueline boundary (TN3) may afford minor terrestrial refuge. However, given the exposed nature of the site and absence of breeding habitat, overall suitability for amphibians is considered low and likely limited to transient individuals only. The boundary treeline also offers suitability for GCN.

	Amphibian presence on-site is considered reasonably unlikely due to the predominance of modified grassland and the general lack of suitable terrestrial refugia. However, the site is located in close proximity to potentially suitable breeding habitat, with two ponds situated within approximately 250m of the site boundary. These ponds are separated from the site by the moderately flowing River Wylfe, which represents a significant dispersal barrier to amphibians. Nevertheless, a footbridge provides a potential crossing point, offering connectivity to adjacent land where few additional physical barriers to amphibian movement are present. In addition, sections of the site boundary fall within an amber risk zone and are partially located within a mapped Core Opportunity Area for amphibians. As such, while on-site suitability is limited, the wider landscape context indicates potential for amphibian use of the site, particularly for terrestrial foraging or dispersal during favourable conditions.
Badgers	Field survey At the southern base of the brick wall separating L1 from TN1, two large mammal burrows (WF3) were recorded, measuring approximately 60 cm and 30 cm in width. The tunnels extended beyond measurable depth and are likely to continue beneath the wall. No evidence of recent badger activity was observed, including spoil heaps, latrines, footprints, or well-worn access paths. The entrances appear inactive, with vegetation and ivy significantly encroaching, suggesting they are disused. Several smaller burrows (WF1) were noted within the grassland (TN1), with rabbit droppings nearby and one European rabbit observed entering a burrow, and another seen close to the notable burrows outlined above (WF3) indicating these are likely attributed to rabbits rather than badger despite the sizes being larger than those typically associated with rabbits. The treeline (L1) and its connectivity with surrounding habitats likely provide cover and foraging opportunities for local badgers, while adjacent grassland offers suitable digging conditions and earthworm availability. Park Street forms a minor boundary along the treeline; however, there are no solid panel fences in place to restrict access to adjacent habitats. Bramble scrub is present in limited areas of the blueline boundary. Bramble berries provide an important seasonal food source for badgers during summer and autumn. Additionally, the off-site eastern boundary hedgerow (h2a – Native Hedgerow) contains hazel, offering further food resources for foraging terrestrial mammals, including badgers.

	Badgers are known to forage in short grassland and improved pastures, such as amenity grassland and semi-improved fields. Given that the Site is composed of historically grazed improved pasture, with comparable habitats nearby, occasional badger foraging or movement across the Site remains possible. No evidence of active setts was recorded on-site or within 30 m of the boundary. Overall, it is considered reasonably likely that badgers may occasionally commute through and forage within the Site.
Bats	Field survey <u>Tree Overview</u> A Ground Level Tree Assessment (GLTA) was undertaken of trees located within the treeline to identify the presence of any Potential Roosting Features (PRFs) for bats. No potential roosting features were noted during the Ground Level Tree Assessment on tree's that will require removal to facilitate access into the site boundary where L1 currently sits.. Therefore, all trees that require removal were classified as PRF-L, suitable for only individual bats or small numbers of bats. Two trees within the wider treeline were identified as supporting PRFs (both labelled WF5). Norway Maple (WF5) (T22 on the arb plan by NB Tree Management) <i>'One stem has major decay with an open cavity and another stem has once torn from the base.'</i> – NB Tree Management The tree exhibits a vertical split with hollowing in two stems (Figure Y). The cavity begins at the stem junction approximately 1 m above ground and extends upward around 1 m. The trunk is heavily ivy-covered, partially obscuring the entrance but also potentially obscuring viewpoints of other potential roosting features.. The hollow provides some shelter, but its low height increases exposure to ground predators & low flying bird species, human disturbance, and damp turbulent conditions. The wide, open entrance offers limited protection; crevice-dwelling bats typically prefer narrower, more sheltered fissures with stable microclimates. Given its low and exposed position, the feature is unlikely to support a maternity roost but may be used occasionally for day

or night roosting or as a transient roost by small numbers of bats. An endoscopic inspection would be required to confirm internal suitability.

The tree is within the blueline boundary, approximately 7 m from the redline, and will not be affected by the proposed works.

Bat Roosting Suitability: PRF - M

Ash (WF6) (T21 on the arb plan by NB Tree Management)

'Three stems extend from base. Three cavities on the smallest stem at 2m.' – NB Tree Management

WF6 is a hollow main stem with three east-facing apertures (Figure Z). The split stem and internal decay create narrow conditions within the cavity, potentially attractive to crevice-dwelling bats. Situated higher above ground than the eastern tree, the cavity is less exposed to ground-based disturbance and damp conditions.

However, the tree lies within the blueline boundary, approximately 9 m from the redline, and will not be affected by the proposed works; no further survey is required.

Bat Roosting Suitability: PRF – M

The wider site with the context of the surrounding landscape is considered to provide moderate foraging and commuting opportunities for bats.

Wider landscape

The Site's immediate network is well connected by mature hedgerows, hedgerows with trees, hedgerows with associated bank or ditch, mature treelines and linear water features, including the River Wylfe. This all provides well connected interlinks between deciduous woodland, wood pasture and parkland and traditional orchard networks.

Micro Lepidoptera species are known to utilise hedgerow networks comprising blackthorn and hawthorn (60 species feed on hawthorn and 48 on blackthorn), both of which can be found in the eastern off-site boundary hedgerow, which are key prey items for several bat species.

Buff Ermine is a common moth and is found in both rural and urban settings. The larva feeds on a wide variety of trees, shrubs and herbaceous plants, including oak, plantain, dock, sorrel, nettle, bramble and elder. This particular moth species is important for several bat species (but notably for (barbastelles).

Dock and nettle are present throughout TN1.

Grazed pasture was noted within 1km of the site; several bat species (particularly horseshoes) have a heavy preference to permanently grazed pastures, which are optimised by interspersed patches of deciduous woodland that are well connected by hedgerows. There are habitats comprising broad-leaved woodland within 1km of the Site. Nearby land-uses may generate higher levels of favourable prey which could disperse across the landscape include the Site's boundary, such as Aphodius beetles, as well as Melontha and Tupilid species, which require short grass to oviposit, which the land provides.

Many juvenile bats, including barbastelles pipistrelle spp., and several Myotis spp. foraging areas, small woodland floodplains and ponds or small river systems with dense layers of shrubby growth. Such habitat lies within 200m of the Site.

Mosquitoes and caddies fly larvae are aquatic invertebrates, as well as gnat larvae, and midges use riparian habitats to breed. Two ponds lie within 500m of the site, as well as the River Wylfe situated within 100m of the Site, meaning bats may occasionally travel across the perimeter of this site to exploit these water features. Studies have found that soprano pipistrelles preferred foraging in wetland habitats (Vaughan et al., 1997) and typically favour riparian habitats, as known water features are often found within a 2km radius of its maternity roosts.

Traditional orchards provide a significant resource for foraging bats, especially greater horseshoe bats. Orchards can provide a protective and sheltered microhabitat for local bat populations, and the concentration of small trees enables bats (particularly low wing-bearing and aerial hawking species) to move through the area more easily and take advantage of the insect prey from under the canopy and underlying grassland, which is often species rich. Such habitat lies within 2km of the Site.

Park Street, which borders the northern edge of the site adjacent to treeline L1, is subject to street lighting which on the road northern side is position on a slight angle which will compromise the treelines feature for less light tolerant species such as horseshoes. The site itself lies on the outskirts of Heytesbury, a small village characterised by a mix of low-density residential properties, gardens, and scattered trees, gradually transitioning into open pasture and agricultural land. This semi-rural setting is unlikely to be significantly affected by artificial light spill. Consequently, both the site and the surrounding landscape are expected to provide suitable habitat for a variety of bat species.

Overall habitat connectivity within the immediate vicinity of the site is considered suboptimal. The northern tree line (L1) is subject

	to street lighting along Park Street and is truncated at both its western and eastern extents by residential development, limiting its function as a continuous linear feature to approximately 170 m. As a result, its value for light-sensitive and low-flying commuting bat species is reduced. Boundary hedgerows within the wider blue line boundary are fragmented and heavily managed due to their location within residential curtilage. This management regime further limits their suitability for use by low wing-loading bat species for commuting and foraging. However, an off-site mature hedgerow located to the east of the site extends approximately 150 m in a north-south direction and directly adjoins the tree line (L1). This feature provides comparatively stronger ecological connectivity to adjacent habitats, including an intensive orchard, a small woodland copse, the River Wylfe corridor, and a wider network of hedgerows and mature trees within the surrounding landscape. The proposed layout has taken account of the intrinsic ecological value of this off-site hedgerow, with a minimum 12 m buffer retained between the hedgerow and the nearest proposed dwelling, thereby maintaining its function as a commuting and foraging corridor for bats. Whilst the assemblage of Priority, Irreplaceable and other related optimal bat foraging/commuting habitat/resources are well dispersed across the wider landscape, rationale has been applied to the context of the Site's integral relationship with such features. The proposals will result in the loss of a small section of the treeline. However, the arb report by NB Tree Management confirms that these losses have been minimised as far as possible. The trees affected are either of low or poor quality and value. Beyond this limited section of the treeline, the proposals will not result in the loss of any other significant features.
Birds	Field survey The Site provides a range of nesting opportunities for birds, particularly along the northern treeline. The tree line offers suitable nesting habitat for common species, while bramble scrub provides additional, albeit limited, potential. During the survey, European robin, house sparrow, Eurasian collared-dove, dunnock, and great spotted woodpecker were observed or heard. A bird's nest was also noted in overhanging vegetation from a neighbouring property in the west of the blueline boundary (WF2). The attributing species considered likely to be carrion crow, which was also observed during the survey.

	Grassland areas offer limited nesting potential. While some taller forbs are present, the historically grazed sward lacks the vertical structure, scrub, or dense vegetation typically required for ground-nesting. Sparsely vegetated areas are unlikely to support ground-nesting species. Overall, it is considered likely that birds may nest within the Site boundary perimeters throughout the nesting bird season.
Flora & Invertebrate	Field survey The habitats on site are commonplace. The grassland is species-poor and reasonably structurally simple, offering limited resources for notable or specialist invertebrate species. While a small number of flowering species of value to invertebrates were recorded, including creeping buttercup and oxeye daisy, which may support generalist pollinators and other common taxa, the site does not support the habitat heterogeneity, floral richness, or microhabitat variation typically associated with important invertebrate communities. Beneath the tree line, the sparsely vegetated ground contains tree litter and dead wood, which provides important microhabitats for invertebrates by supplying shelter, moisture, and decomposing organic matter. Trees offer habitat for beetles (Coleoptera) within bark crevices and decaying wood. Leaf litter supports decomposers such as woodlice and earthworms, while dead wood serves as breeding sites for beetle larvae and hoverflies. Collectively, these features contribute to nutrient cycling and help maintain a diverse invertebrate community. Bramble Scrub is present in the blueline boundary (TN3). Bramble young shoots, which will naturally regenerate, are known to be important food plants for several caterpillars, e.g. grizzled skipper butterfly and many moths, including the bramble shoot moth and scarlet tiger moth. Red admiral and speckled wood butterflies, bees and hoverflies are among several insects attracted to the nectar of blackberry flowers. Therefore, common invertebrates are likely to be present on-site. Brown hairstreak butterfly are not considered to utilise the site, as there is no abundance of essential indicator species such as blackthorn. No invasive and non-native species listed under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) were observed. However, the survey was undertaken at a time when many plants were not present, and so the absence of such species cannot be definitively confirmed.

Hazel Dormice	Field survey The Site offers limited foraging opportunities for hazel dormice. No evidence pertaining to nest making, commuting or foraging was noted on-site. A mature tree line is present along the northern to eastern boundary of the site, extending for approximately 170 m parallel to Park Street before terminating abruptly at adjacent residential properties. Trees within this feature are relatively widely spaced concerning the redline boundary and arranged in a staggered pattern, resulting in a discontinuous canopy with limited lateral connectivity. While canopy connectivity is likely to increase during the summer months due to leaf cover, the feature remains structurally fragmented. The tree line does not connect directly to woodland or other extensive areas of suitable hazel dormouse habitat, with the exception of an off-site mature hedgerow located to the east of the site, which extends approximately 170 m in a north-south direction and provides comparatively greater connectivity for the species. The off-site hedgerow includes small areas of bramble and hazel, two important resources for the species, but these are not plentiful across this off-site linear feature. Hazel dormice are arboreal mammals that rely on continuous canopy cover and well-connected hedgerows or woodland edge habitats to move safely through the landscape. They typically avoid prolonged ground-level movement due to increased predation risk and generally require overlapping tree crowns, dense shrub layers, or scrub connectivity to facilitate arboreal dispersal. As such, use of the surveyed tree line would likely necessitate frequent movement at or near ground level between individual trees, reducing its functional value for dormouse commuting or foraging. In addition, the tree line is linear, relatively short in extent, and isolated within the local landscape, being severed at its eastern extent by residential development. This further limits its value as a dispersal corridor and reduces the likelihood that it forms part of a wider, functionally connected dormouse habitat network. Although the surrounding landscape is rural in character, the lack of continuous woody connectivity constrains its suitability for hazel dormice. Nevertheless, its linkage to the off-site eastern hedgerow marginally enhances its ecological value. On this basis, the tree line is considered to offer low potential to support the species or to function as a significant commuting or dispersal feature. However, given the presence of desk study records indicating hazel dormice occurring approximately 1 km
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	from the red line boundary, occasional transient use of the feature cannot be entirely discounted.
Reptiles	Habitat for reptiles (particularly with the United Kingdom's unpredictable weather patterns) requires optimal thermal and structural properties (Edgar et al. 2011). Field survey While the majority of the Site is composed of species-poor grassland, which is largely unsuitable for reptiles due to the lack of structural cover, exposure to predation, and temperature extremes, some areas provide limited habitat value. Slightly taller vegetation, such as common dock and common nettle, creates small, warmer microhabitats, and features including deadwood, leaf litter, and the treeline offer pockets of shelter, foraging opportunities, and basking sites. Despite these features, the Site is bordered to the north by Park Street and surrounded by arable land to its east and south, limiting connectivity to higher-quality habitats beyond the client's boundary and reducing the likelihood of colonisation or regular use. Nonetheless, areas of tall forbs, the treeline (L1), and TN2 along the Site's northern boundary may offer pockets of suitable habitat and serve as a potential movement corridor, particularly for species such as slow worm and grass snake. Given the structural diversity present in localised areas, reptiles cannot be entirely ruled out, although the overall habitat is suboptimal and dominated by exposed grassland. Occurrence is therefore considered possible but likely to be restricted or transient rather than supporting established populations.
Otter	The Site does not present habitats required for this species, such as watercourses, vegetated riverbanks, reedbeds and woodland. Otters are likely to be active in the wider landscape, but their presence is considered to be unlikely on-site.
Water Vole	The Site does not present habitats required for this species, such as slow moving or still watercourses, and soft banks. Though, suitable habitats do sit nearby. However, during the survey, five burrow features (WF4), all of which lie in the blueline boundary adjacent to the southern fence line, were recorded. The burrow entrances measured approximately 5–10cm in diameter (being the size consistent with those typically associated with water vole and other vole species) and extended into discernible tunnels. Small piles of droppings (approximately 5mm in length) characteristic of water vole were noted at the entrance of two burrows (Figure V and Figure W), and feeding remains, including discarded snail shells,

	were present in the immediate vicinity. The burrows were grouped near a seasonally flooded area, approximately 56m from the River Wylfe. Tall grasses and ruderal species (TN1) offer suitable food resources throughout the active season in this area sitting along the edge of the client's blue line boundary. No footprints were observed during the assessment, this may have been due to recent heavy rainfall washing away any evidence. The burrows are considered more likely to be attributable to field vole activity rather than water vole, as their location proximity to the nearest suitable riparian feature is considered too far for the species to travel from the location of the identified off-site burrows. Water voles are closely associated with watercourses and typically construct burrows within the banks or immediately adjacent to the water's edge. Their movements are usually restricted to travelling along the banks of rivers, streams, or ditches, rather than across open ground, as overland travel increases exposure to predation. While short overland movements can occasionally occur where dense vegetation provides continuous cover, movements of around 50 m away from a watercourse are considered atypical and inconsistent with the species' normal behaviour. Therefore, the presence of burrows located approximately 56 m from a river would be considered unlikely to represent regular commuting or functional habitat use by water voles. Moreover, this conclusion is based on the following factors: the absence of suitable banks to support burrow construction (Strachan et al., 2011); the historically grazed nature of the sward; and the presence of several runways and smaller (2–3 cm diameter) burrows recorded throughout TN1, significantly distanced from the Site boundary. Additionally, water voles typically favour habitats with a well-developed margins and litter layers adjacent to watercourses. No evidence pertaining to the species was noted within the red line boundary. The site boundary shows a distinct absence of notable habitat requirements such as extensive tall grassland, sedges, rushes and herbs which are necessary for water voles and other vole species to provide cover from predators. While the presence of water vole cannot be entirely ruled out without further presence/absence surveys, identified burrows are located more than 60m from the red line boundary at the time of writing and the proposed development footprint.
Other Notable Species	The Site offers suitable refuge for small mammals, notably hedgehog.

	Hedgehogs rely on sheltered habitat assemblages such as woodland edges, rough grassland, log and leaf piles and thick undergrowth, including shrubby layers. Leaf litter is present in TN3 under the treeline. Brown hare are unlikely to be present on-site.
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6. Recommendations and Enhancement Opportunities

6.1 Assessment of Impacts

Statutory and Non-Statutory Designated Sites

In March 2022, Wiltshire Council was notified of nutrient issues within the River Avon SAC. The advice note from Natural England concerned the unacceptable levels of phosphates in the River Avon site. The excessive phosphates have resulted in the condition of the site to be in an 'unfavourable condition'.

As a result of a court judgment known as Dutch N, the Wiltshire Council was advised as Competent Authorities under The Conservation of Habitats and Species Regulations 2017, that Local Planning Authorities must not permit any new residential development, infrastructure that supports agricultural intensification, anaerobic digesters, some tourism development and development that provides overnight accommodation unless it 'can be certain beyond a reasonable doubt' that it would not give rise to additional phosphates within the hydrological catchment of the River Avon SAC Site.

Nutrient neutrality is a term used to describe when the nutrients entering the fluvial catchment as a result of an increase in additional wastewater discharged from a new development is mitigated. Therefore, it must be sufficiently evidenced that the development will not result in an increase in nutrients discharging into the catchment Impact Risk Zone which subsequently discharges into the Designated Site which has been found to be in unfavourable condition.

The Site is within the River Avon catchment which is hydrologically connected to the Designated Site. As stated by Wiltshire Council's County Ecologist in their pre-application enquire response, a Nutrient Assessment and Mitigation Strategy, followed by a Habitats Regulations Assessment in accordance with Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) will be required. These documents will be required to support any planning application that is submitted, which thereon will require approval by the competent authority (Wiltshire Council) and the nature conservation body (Natural England).

	All other sites as listed within section 5.1 are not foreseen to be subject to any impact in relation to the proposals owing to the small-scale nature of the proposals, as well as the distance from the site and intervening barriers obstructing the ecological connectivity to the site.
Habitats	The desk study revealed that there are no habitats listed under Section 41 of the Natural Environment and Rural Communities Act 2006 being present. Similarly, no habitats listed on National or Local UK Biodiversity Actions Plans were recorded during the survey The Site is covered by the following Habitat compositions: • g4 – Modified Grassland • u1f – Sparsely Vegetated Land • 33 – Line of Trees • 32 – Individual Trees Blueline Habitats: • g4 – Modified Grassland • h3d – Bramble Scrub • u1f – Sparsely Vegetated • 33 – Line of Trees • 32 – Individual Trees The habitats recorded within the site are primarily classified as having 'low' to 'medium' distinctiveness under the Statutory Biodiversity Metric framework. According to the Statutory Biodiversity Metric User Guide (DEFRA, July 2025), habitat distinctiveness reflects the ecological value of a habitat based on its type and defining characteristics. This assessment takes into account factors such as species diversity, habitat coverage, statutory protection status, and the extent to which the habitat supports species that are uncommon elsewhere. Where impacts to these habitats occur, they can generally be offset through appropriate habitat creation or enhancement measures, including the establishment of scrub communities, planting of shrub species, areas of sparsely vegetated ground, and grassland habitats. The proposals will result in the loss of a small section of treeline L1 and small areas of bramble scrub. However, the Arb report by NB Tree Management confirms that tree removal has been minimised wherever possible. The affected trees are all of low or poor quality and limited value. The Arboricultural Report NB Tree Management identifies the removal of T15, T16, T17 and Group G4 within the existing treeline,

	together with T8 (referred to as 32 – Individual Tree – Rural Tree, T1 on BN Ecology's habitat plan), to enable the formation of the new site access. T1 comprises a 'small' in size class hawthorn with no features suitable for bat roosting or any nesting birds identified. Group G4 comprises predominantly young immature elm and plum of poor quality and declining condition. The elms show signs of Dutch elm disease and are recommended for removal. Most trees within G4 are immature and would not meet the BNG metric threshold for classification as "trees" (DBH >7.5cm). T15, T16 and T17 are also identified as low-quality plum specimens. The proposed access road will have a width of 4.8m. However, to accommodate the required visibility splays, a wider section of the existing treeline—measuring approximately 11m at its maximum extent—will need to be removed between T15 and T17. The remaining habitat losses are limited to low distinctiveness habitats, comprising g4 – Modified Grassland and u1f – Sparsely Vegetated Land. The proposals will result in the localised, permanent loss of a small section of the existing treeline (L1) to facilitate the formation of a new site access and associated visibility splays. In accordance with the Arboricultural Report (NB Tree Management), tree removal has been minimised wherever practicable and is confined to individual trees and groups of low quality and limited ecological value, including immature elm and plum specimens within Group G4 and individual trees T15, T16, T17 and T1. No features suitable for bat roosting or nesting birds were identified, and several specimens show evidence of decline, including Dutch elm disease. The magnitude of impact is assessed as low, affecting a small proportion of the treeline resource, with the majority of L1 retained. While a section of treeline measuring up to approximately 11 m in width will be removed at its maximum extent, overall canopy-level linear continuity will be maintained, as the removed trees largely occur below the canopy of taller, mature poplar trees. Some localised disruption to connectivity at lower strata will occur; however, with the incorporation of suitably designed and buffered replacement planting along the margins of the new access, the impact is assessed as not significant in ecological terms at the site level, Overall, the Site is considered to be of Site value for habitats. No further surveys are recommended. Please see section 6.2.
Amphibians	The desk study has confirmed that there are no European Protected Species Class Survey Licence Returns for the species

	have been issued within 2km of the site, and their presence has not been confirmed within 2km of the Site. The Site in part lies within a Amber Risk Zone for great crested newt and is also in part within a 'Core' Great Crested Newt Strategic Opportunity Area for the species. Two ponds are located within 250m of the Site. It is considered there are few intervening barriers with the (exception of the River Wylfe, though there is a suitable footbridge that could be utilized by opportunistic amphibians) Site meaning there is little deterring migration to the Site thus rendering the site suitable for amphibians during their terrestrial phase, including great crested newt. Wiltshire Council's County Ecologist outlined in their pre-application enquiry response that <i>'the applicant intends to enter Wiltshire's District Wide Great Crested Newt Mitigation Licence scheme.'</i> The boundary northern tree line, and off-site eastern hedgerow are both considered suitable habitat for GCN and common amphibians. There is a risk that Great Crested Newts could be harmed or killed during vegetation clearance and groundworks if suitable terrestrial habitat is affected. Without appropriate mitigation, activities such as long-sward grassland removal, soil stripping, or clearance of small tree's to facilitate access could lead to direct mortality or injury to individual newts sheltering in the vegetation or within soil crevices. This would constitute an offence under the Conservation of Habitats and Species Regulations 2017 (as amended). Overall, the Site is considered to be of Site/Local value for amphibians. No further surveys are recommended. Please see section 6.2.
Badgers	Wiltshire Council's County Ecologist outlined in their pre-application enquiry response that there are local records of badger within the local area. It is not expected that there will be direct impacts on the species as a result of the proposed development. However, it cannot be ruled out that local populations utilise the site for commuting and foraging purposes. Therefore, there is a risk that badgers may commute through the Site and fall into excavations (if any are created) during the construction phase. Two possible badger holes were recorded beneath the treeline L1 within the site. Both features are heavily overgrown with ivy and show no evidence of recent badger activity, such as spoil

	heaps, footprints, bedding material, hair, or well-used access paths. On this basis, the holes are considered to be disused at the time of survey and are not functioning as an active sett. Given the absence of signs of current use, the proposed development is unlikely to result in direct impacts on badgers or active setts, and no offence under the Protection of Badgers Act 1992 is anticipated based on current site conditions. However, badgers are known to re-use historic or disused holes, and activity levels can change over time, particularly in response to seasonal behaviour or changes in surrounding land use. Therefore, there is a risk that an offence under the Protection of Badgers Act 1992 may be resultant if the disused setts are recolonised prior to the commencement of construction activities. Overall, the Site is considered to be of Site value for badgers. No further surveys are recommended. Please see section 6.2.
Bats	The desk study shows that there has been three European Protected Species licences issued within 2km of the Site, specifically pertaining to bats. The closest licence for the species was issued approximately 1.6 km to the north of the Site. The County Ecologist Advised in their pre-application response that there <i>'is a recorded bat roost 250m southwest of the site, which suggests the potential for bat activity on site.'</i> Additionally, the County Ecologist Advised in their pre-application response that local records for lesser horseshoe and pipistrelle bat are known within the local area. Two trees within the site were identified as supporting potential roost features of moderate suitability (PRF-M) during the Ground Level Tree Assessment. These features may provide roosting opportunities for bats, which are legally protected under the Conservation of Habitats and Species Regulations 2017 and the Wildlife and Countryside Act 1981 (as amended). No direct impacts to bats are anticipated as a result of the proposed development, as the identified trees are retained and are located at a distance from the red line boundary that provides an appropriate buffer. This separation is expected to avoid direct loss of roost features and to substantially reduce the risk of disturbance to any bats that may be roosting, including disturbance arising from construction activity, increased human presence, vibration, noise, and changes in lighting levels. However, it is recognised that where suitable buffers are not maintained, development in close proximity to potential roost features can give rise to indirect impacts. These may include disturbance to roosting bats through elevated noise and

vibration during construction, light spill affecting emergence and re-entry behaviour, and increased activity levels within the immediate roost environs. Such impacts could result in temporary or permanent roost abandonment, particularly for more light-sensitive species, and would represent a potential legal risk if roosts were present.

Given that the trees supporting PRF-M are retained and buffered within the current proposals, and no works are proposed that would affect these trees or their immediate surroundings, the likelihood of adverse effects on bats is considered low. On this basis, and in line with current best practice guidance, further bat surveys are not considered necessary at this stage, provided that the design parameters, including buffer distances and sensitive lighting, are maintained through detailed design and construction.

A mature tree line is present along the northern boundary of the site and extends off-site for approximately 170 m before terminating at residential development to the east and west. This feature provides linear habitat that may be used by commuting and foraging bats, albeit its ecological function is already constrained by its limited length, isolation within a residential context, and the presence of street lighting along Park Street.

The proposed development requires minor tree removal of up to approximately 11 m along a short section of the tree line to facilitate a new site access and associated visibility splays. The trees to be removed are predominantly smaller, lower-canopy individuals, and the upper canopy structure will be largely retained. As such, the proposals will not result in a substantial loss of canopy cover; however, the removal of lower-canopy vegetation will lead to localised and minor fragmentation of the tree line, reducing its effectiveness as a continuous commuting feature for bats at this specific location.

This minor fragmentation has the potential to reduce suitability for more light-sensitive and low-flying bat species, which typically rely on continuous linear features for navigation and predator avoidance. In addition, if not appropriately buffered, development in close proximity to retained trees could result in indirect disturbance impacts to bats, including through increased lighting, noise, vibration, and human activity, particularly if roosting bats were present within retained trees. Such disturbance could alter commuting behaviour or, in the worst case, lead to temporary or permanent avoidance of the feature.

However, the magnitude of impact is assessed as low, for the following reasons:

- The affected section of tree line is short in extent and does not represent a key strategic commuting corridor, given that the feature is already severed at both ends by residential development.
- The majority of the tree canopy will be retained, maintaining overall linear continuity at a landscape scale.
- The tree line does not form part of a wider, uninterrupted network of high-quality bat commuting habitat.

To reduce and compensate for the minor loss of lower-canopy connectivity, buffer planting is proposed along the margins of the new access road, designed to reinstate structural connectivity and soften the transition across the access point. This planting will help restore a vegetated edge, maintain navigational cues for commuting bats, and reduce light spill and disturbance effects associated with vehicle movements. Boundary hedgerow planting along the southern perimeter of the redline boundary extending the site's extent east-west is also proposed, which shall enhance and accordingly reinstate local landscape connection in these directions.

In addition, an off-site mature hedgerow located to the east of the site extends approximately 150 m off-site in a north-south direction and provides good-quality commuting and foraging habitat for local bat populations. While a short section (approximately 30 m) of residential garden boundaries will lie adjacent to this hedgerow, the proposed dwellings will retain a minimum buffer distance of approximately 12 m from the hedgerow. This separation is considered sufficient to maintain its ecological function, minimise disturbance, and avoid direct impacts from lighting and increased activity.

Taking into account the limited scale of tree removal, the retention of the majority of canopy cover, the existing fragmentation of the tree line, and the proposed buffering and planting measures, the development is not expected to result in a significant adverse effect on bat commuting or foraging activity. Subject to the retention of proposed buffers and sensitive lighting design, residual effects are assessed as minor adverse at most, with the overall bat habitat network remaining functionally intact.

It is considered that habitats to be lost to greater extents are of low functional value to the species, including species poor modified grassland and sparsely vegetated land. Indeed, biodiversity net gain proposals (outlined in a separate report, undertaken by BN Ecology) on land within the blueline boundary show how terrestrial habitats will be enhanced which will increase

	landscape connectivity and prey abundance across the clients wider land holding. It cannot be ruled out that local populations utilise the site for commuting and foraging purposes. Any increased artificial lighting on site may reduce, sever or result in existing important commuting lines and associated foraging habitats becoming inaccessible to local bat populations. Overall, the Site is considered to be of Site value for bats. No further surveys are recommended. Please see section 6.2.
Birds	The desk study identified that the site lies within a targeted zone pertaining to Lapwing. However, the habitat and its extent are not suitable for the species. The County Ecologist Advised in their pre-application response that there are local records pertaining to Barn Owl, Kestrel and Grey Heron. The site provides suitable nesting and foraging habitat for a number common bird species. A range of common birds were heard and seen during the survey, all of which could utilise the sites boundaries for breeding, particularly the treeline L1 (particularly habitats associated with trees and scrub areas) . A disused bird nest was noted within overhanging vegetation in the west of the blueline boundary. All wild birds are granted legal protection under the Wildlife & Countryside Act 1981. As the proposals are likely to require the removal of trees pertaining to L1, breach of this legislation could occur if left unmitigated. Overall, the site is considered to be of Site value for nesting birds. No further surveys are recommended. Please see section 6.2.
Hazel Dormouse	The site offers limited suitability for hazel dormouse, with no evidence of nesting, commuting, or foraging recorded during the field survey. A mature tree line is present along the northern to eastern boundary of the site, extending for approximately 170 m parallel to Park Street before terminating abruptly at residential properties. This feature is structurally fragmented, with trees relatively widely spaced and arranged in a staggered pattern, resulting in limited lateral connectivity. While canopy connectivity is likely to increase seasonally, the feature remains suboptimal for an arboreal species reliant on continuous woody cover. The tree line does not form part of a wider, well-connected network of suitable dormouse habitat. The only notable linkage is to an off-site mature hedgerow located to the east of the site, extending approximately 150 m in a north-south direction. This hedgerow provides comparatively greater connectivity and

	contains limited areas of hazel and bramble, which are key resources for dormice, although these are not abundant. Given the tree line's short length, isolation, and lack of continuous canopy structure, it is assessed as being of low ecological value for hazel dormouse. However, desk study records confirm the presence of the species within approximately 1 km of the red line boundary, and therefore occasional transient use of boundary features cannot be entirely discounted. The proposed development requires minor tree removal (up to approximately 11 m) from the northern tree line to facilitate a new site access and associated visibility splays. The trees to be removed are predominantly smaller, lower-canopy individuals, with the majority of the tree line and upper canopy structure retained. The loss of these trees will result in a localised increase in fragmentation of an already discontinuous feature. This may further reduce its suitability as a commuting or foraging route for hazel dormice, particularly given the species' reliance on continuous canopy cover and avoidance of ground-level movement due to predation risk. However, given the existing low suitability of the feature and its limited role within the wider landscape, the magnitude of this impact is considered low. There is also a theoretical risk of disturbance or harm should a dormouse be present within vegetation scheduled for removal, particularly during the active season when nests may be present within dense vegetation. Although the likelihood of occupancy is low, dormice are fully protected under the Conservation of Habitats and Species Regulations 2017, and any harm or disturbance would constitute a legal offence. No direct impacts are anticipated to the off-site eastern hedgerow, which represents the most suitable habitat feature within the local landscape. While a short section of residential gardens will adjoin this hedgerow, a minimum 12 m buffer will be retained between the hedgerow and proposed dwellings, which is considered sufficient to avoid indirect disturbance and maintain its ecological function. Overall, the Site is considered to be of Site value for reptiles. No further surveys are recommended. Please see section 6.2.
Reptiles	The desk study did not reveal any European Protected Species licences being issued within 2km. The County Ecologist Advised in their pre-application response that there are local records pertaining to common lizard within the local area.

	The Site provides localised suitable conditions for common reptile species. Tall fobs in TN1 and bramble scrub in the blueline create warm, sheltered microhabitats, while deadwood and leaf litter in the sparsely vegetated land offer opportunities for refuge, foraging, and basking. Accordingly, species such as grass snake and slow worm may be present, albeit likely at low densities. The treeline provides herbaceous cover and may function as a localised movement corridor between sheltering and foraging areas. However, the presence of Park Street immediately adjacent to L1 presents a barrier to connectivity with more suitable habitats in the wider landscape. Given the structural diversity present in localised areas, reptiles cannot be entirely ruled out, although the overall habitat is suboptimal and dominated by exposed short species poor grassland. Vegetation clearance and groundworks therefore carry a risk of direct injury or mortality in the absence of appropriate mitigation. Overall, the Site is considered to be of Site value for reptiles. No further surveys are recommended. Please see section 6.2.
Flora & Invertebrates	The habitats on-site are common place. It can be expected that common invertebrates will utilise the on-site vegetation networks, albeit on a microhabitat scale. However, these habitats can be readily compensated, and indeed, habitat enhancement and creation/enhancement proposals on adjacent land pertaining to Biodiversity Net Gain will provide significant enhancement for the diversity and extent of habitats available for invertebrates. No invasive and non-native species listed under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) were observed. However, the survey was undertaken at a time when many plants were not present, and so the absence of such species cannot be definitively confirmed. Overall, the Site is considered to be of Site value for invertebrates. No further surveys are recommended.
Water Vole	The County Ecologist Advised in their pre-application response that there are local records pertaining to water vole within the local area. Five small mammal burrows were recorded within the blue line boundary close to the southern fence line, located approximately 56 m from the River Wylfe. While certain characteristics of the burrows, including their size and the presence of green droppings, could be consistent with water

	vole, the absence of suitable riparian banks, their distance from the watercourse, the historically grazed sward, and the presence of numerous smaller burrows and runways across the grassland indicate that these features are more likely attributable to field vole. However, the presence of water vole cannot be entirely discounted. The recorded burrows are located approximately 70 m from the nearest extent of the proposed development footprint. Provided that a minimum buffer of 10 m is retained between the works and the burrow locations, no direct or indirect impacts to water vole are anticipated. Under the current proposals, there will be no habitat loss, disturbance, or fragmentation affecting potential water vole habitat. Should the design or construction methodology change such that works are required within the 10 m buffer, further targeted surveys would be required to confirm the presence or absence of water vole prior to commencement. Any confirmed presence would necessitate appropriate mitigation in line with relevant legislation, including the Wildlife and Countryside Act 1981 (as amended), and may require licensing where applicable. Based on the current layout, separation distances, and the limited suitability of the habitat, the risk of impact to water vole is assessed as negligible, and no further surveys or mitigation measures are considered necessary, provided that the proposed buffer is retained throughout construction and operation. Overall, the Site is considered to be of Site value for hedgehogs. No further surveys are recommended. Please see section 6.2.
Other Notable Species	The Site offers limited refuge for hedgehog, mainly provided by the leaf litter layers under the treeline. Hedgehogs may commute through the Site, fall down and get stuck in any excavations during the construction phase. Moreover, death, injury or otherwise increased disturbance levels may be resultant during constructions activities, especially vegetative habitat clearance. Overall, the Site is considered to be of Site value for hedgehogs. No further surveys are recommended. Please see section 6.2.

6.2 Further Surveys (if required) and Recommendations

Methodology to Identifying Ecological Constraints

All potential ecological constraints in relation to the development proposals have been thoroughly considered in Section 5. Opportunities to deliver ecological enhancement in accordance with local and national planning policy have also been considered and are outlined below.

Planning policy makes it clear that any proposed development duly considers and applies the below mitigation hierarchy when considering impacts to ecological species and habitats:

1. **Avoidance:** every attempt should be made to avoid creating impacts on features from the outset;
2. **Minimisation:** where avoidance cannot be wholly achieved, measures by design, suitably designed methods of working or other actions to minimise impacts (otherwise known as mitigation) should be employed;
3. **Compensation/restoration:** if avoidance and minimisation cannot be wholly achieved, significant impacts on features should be compensated in such a way to restore an area to its original ecosystem or any other ecological functions/services that existed prior to impacts relating to the development.

The hierarchy requires that avoidance is applied where possible. When it is not feasible to avoid such impacts, rationale for minimisation/compensation/restoration should be sufficiently detailed, showing the measures are feasible to implement.

The ecological constraints associated with the development have been assessed in accordance with the mitigation hierarchy, with due consideration to apply, as much as possible, actions to avoid impacts on ecological features.

In addition to the above, Section 40 of the Natural Environment and Rural Communities Act 2006 states that *'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'* as well as *'Conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'*.

Protection of Habitats

Retained trees and off-site hedgerows should be protected during the works, including any groundworks, by the establishment of Root Protection Areas in accordance with BS 5837:2012. All off-site boundary features should be marked by Heras fencing, if appropriate, erected prior to works commencing. No materials or construction plant(s) should be allowed within the allocated buffer zone.

General

Prior to the commencement of any works, construction operatives should be inducted by a suitably qualified ecologist to make them aware of the possible presence of protected species, briefed on their legal protection, how to identify them, the habitats they are most likely to be found in, and the working practices to avoid harming them.

Species

Amphibians

The site lies in part within a Amber Risk Zone for great crested newt and there are two ponds within 250m/ Additional, there are few intervening barriers between the Site and nearest pond. It is recommended that Wiltshire's District Level Licensing (DLL) Scheme is joined. To begin this process, an Enquiry Form should be sent to Natural England which enables applying for an impact assessment and conservation payment certificate (IACPC).

Bats

Two trees (WF5 & WF6) were identified with PRF-M potential to support roosting bats. These trees are located outside the red line boundary and will not be directly affected by the proposed development. In accordance with Natural England best practice, a minimum 5 m buffer will be maintained around each tree for the duration of works to avoid damage, disturbance, or indirect impacts to potential roost features. Protective fencing will be installed prior to commencement and retained throughout construction.

Provided this buffer is implemented and adhered to, the proposed development is unlikely to result in adverse effects on bats, and no further survey or mitigation is considered necessary at this stage

To mitigate the minor loss of lower-canopy connectivity associated with the new site access, buffer planting should be provided along both margins of the entry road, designed to reinstate a continuous linear vegetated feature. Planting should comprise a mix of locally native, shrub-dominated species with some standard trees, selected to achieve rapid structural connectivity at lower and mid-canopy levels. Species such as hawthorn, blackthorn, hazel, field maple, dogwood and holly should be used to create a dense, staggered planting arrangement, with trees positioned to promote future canopy overlap. Planting should be set back sufficiently from the road to avoid future pruning pressure and should be managed to maintain height and density, thereby providing effective shelter and navigational cues for commuting bats and other wildlife.

In addition, a new native hedgerow should be established along the west–east extent of the red line boundary (which at the time of writing was indicated in the site plans (see '*Site Plan and Enhancement Proposals*' below) , designed to strengthen landscape-scale connectivity and link retained habitats. The hedgerow should follow a traditional mixed native specification, including species of known value to bats, dormice and other fauna, such as hazel, hawthorn, blackthorn, bramble, dog rose and occasional standard trees (e.g. oak or field maple). Management should avoid intensive trimming and allow the hedgerow to develop a dense structure with a varied profile. Where feasible, associated buffer strips should remain unlit to maintain dark corridors, enhancing the functional value of the hedgerow as a commuting and foraging feature.

The introduction of artificial lighting levels would increase light spill as a result of the proposals.

It is therefore recommended that a sensitive lighting design for bats, which follows Guidance Note 08/23 Bats and artificial lighting in the UK (ILP and BCT 2023), should be prepared by a suitably qualified consultant. The design should show how and where external lighting will be installed and supported, where appropriate, with technical specifications. The sensitive lighting design for bats should also ensure that areas to be lit will not disturb or prevent bats using their territory. The design should accord with Step 5 of Guidance Note 08/23. The Local Planning Authority will likely require that all external lighting needs to be installed in accordance with the specifications and locations set out in the agreed design and thereafter maintained in accordance with the design.

Badger

No active setts or evidence of commuting or foraging badgers were identified within the Site or within 30m of the site. Therefore, the Site is likely to be used occasionally by commuting and foraging badgers.

Two mammal holes (WF3) were identified on-site that may historically have been associated with badger. However, dense ivy encroachment, combined with the absence of supporting evidence such as spoil heaps, latrines, footprints, or well-worn access paths, indicates that these features are currently disused.

Notwithstanding this, badgers are a mobile species and may recolonise former sett entrances between completion of this assessment and commencement of works. To account for this possibility, a pre-commencement badger survey will be undertaken by a suitably experienced ecologist within six weeks prior to any vegetation clearance or groundworks. Any necessary mitigation measures will be agreed prior to the commencement of works.

Should an active badger sett be identified and works are likely to affect a resting place, all activities will be undertaken in accordance with relevant legislation, including the Protection of Badgers Act 1992. Where required, a Natural England licence will be obtained prior to any works affecting a badger sett commencing.

It is recommended that, during construction, if excavations or large pipes are created (>200mm diameter) these must be covered at night. If excavations are left open, then it is essential that a means of escape is created. As an example, this may include a plank to allow badgers and other small mammals to escape if they fall in. If further signs of badgers are encountered during the works, then works should stop until advice is sought from a suitably qualified ecologist at the earliest possible opportunity.

Hazel Dormouse

The northern treeline provides low potential for hazel dormice, however, occasional cannot be entirely rules out. Prior to any works, including groundworks, commencing on site vegetative clearance (pertaining to removal of trees associated with L1) will be carried out in strict accordance with the following procedure, either:

a) In October when dormice are still active but avoiding the breeding and hibernation seasons.

A licensed dormouse ecologist shall supervise the work checking the site for nests immediately before clearance and, if needed, during clearance. All work shall be carried out using handheld tools only. If an above-ground nest is found it shall be left in situ and

no vegetation between it and the adjacent undisturbed habitat shall be removed until dormice have gone into hibernation (December) as per method b); or

b) Between December and March only, when dormice are hibernating at ground level, under the supervision of a licensed dormouse ecologist.

The trees will be cut down to a height of 30cm above ground level using hand tools. The remaining stumps and roots will be left until the following mid-April / May before final clearance to allow any dormouse coming out of hibernation to disperse to suitable adjacent habitat.

No vegetative clearance will be permitted between June and September inclusive when females have dependent young.

Nesting Birds

The proposed development requires the removal of vegetation which may support nesting birds. It is recommended that no removal of vegetation on-site should take place between 1st March and 30th of September inclusive, unless a competent ecologist has undertaken a careful, detailed check for active birds' nests immediately before the vegetation is cleared or works to or demolition of the building commences. In no circumstances should netting be used to exclude nesting birds. If nesting birds are recorded during this inspection(s), then the vegetation must remain with a sufficient sectioned exclusion zone marked around the nest site until any dependent young have fledged.

Reptiles

It is recommended that a precautionary set of working measures are implemented in relation to reptiles. Working measures should comprise the following:

- Vegetation must be maintained below 5cm to maintain the sub-optimal habitat value for reptiles
- Any excavations should be covered overnight, or a means of escape, such as a plank installed to allow reptiles to escape if they fall in
- Pollution prevention measures should be implemented in accordance with the Environment Agency's *Pollution Prevention Guidelines 2015*
- Where the use or generation of chemicals and pollutants occurs, COSHH regulations should be implemented in relation to storage and disposal in order to preserve and protect nearby waterbodies
- In the unlikely event that reptiles are found within the working area, they should be given sufficient time to disperse, or in extreme circumstances, moved by hand to suitable sheltered vegetation
- In the unlikely event that smooth snakes and/or sand lizards are identified, works must cease immediately, and advice must be sought from a suitably qualified ecologist
- Any features such as rubble piles which potentially afford resting places for common reptiles will be dismantled by hand by a competent ecologist in April or August to October.
- Hedgerow clearance (though, none is anticipated) should be undertaken using a two-stage cut, with the base vegetation removed by hand and arisings carefully lifted and shaken out to allow any reptiles time to disperse naturally into adjacent retained vegetation or pre-identified refugia.

Water vole

Based on the findings, no direct impacts to water vole are anticipated under the current proposals, due to the separation distance between the proposed works and recorded burrow features, and the limited suitability of on-site habitats. To ensure continued compliance with wildlife legislation and to avoid indirect impacts, the following measures are recommended:

- A minimum 10 m buffer should be retained between all construction activities and the recorded burrow locations near the southern boundary of the site. This buffer should be clearly demarcated on construction drawings and protected throughout the construction period.
- No vegetation clearance, earthworks, storage of materials, or vehicular movements should take place within the buffer zone.
- Should design changes require works to occur within the buffer, a targeted water vole survey by a suitably qualified ecologist may be required to confirm presence or likely absence and thus inform any further mitigation requirements.
- All site operatives should be made aware of the potential presence of protected species through an ecological toolbox talk, including procedures to follow if a water vole or signs of water vole are encountered during works.
- Any unexpected sightings of water vole during construction should trigger an immediate cessation of works in the affected area and consultation with a qualified ecologist to agree appropriate actions.

With these measures in place, no further surveys or mitigation are considered necessary, and residual effects on water vole are assessed as negligible.

Other Notable Species

The site offers limited refuge for hedgehog, mainly provided by the hedgerows. Therefore it is recommended that prior to vegetative clearance, any features potentially used by hedgehogs, such as the long rough grassland, shall be checked by a competent ecologist via a fingertip search. Any individuals found will be translocated to an appropriate location outside of the construction site and away from roads prior to works commencing.

Enhancement Opportunities

The National Planning Policy Framework (193d) requires biodiversity enhancement to be provided within the development boundary.

- It is recommended that consideration is given to any proposed on-site hedgerow creation. Species composition of new hedgerow(s) should be planted with native

species comprised of the following: common dogwood, hazel, hawthorn, spindle, and guelder rose.

- It is recommended that a Habibat 001 bat box or similar is built into each dwelling at least four metres above ground level and away from windows of the west or south facing elevation.
- It is recommended that any new shrubs incorporated within the Site boundary should be high nectar producing to encourage invertebrates to the Site, as well as provide continued foraging for bats. The Royal Horticultural Society guide, "RHS Perfect for Pollinators, www.rhs.org.uk/perfectforpollinators" provides a well-suited plants list of both native and non-native species. In addition, all new trees planted on site should ideally be from local native stock, such as common crab apple, whitebeam and common hazel.
- It is recommended that a Vivra Pro Woodstone House Martin nest or similar is mounted directly under the eaves of the north elevations on each of the dwellings.
- A bee brick is recommended to be built into the walls about 1 metre above ground level on the south or southeast elevations on each of the dwellings.
- It is recommended that new fencing incorporates accessible hedgehog holes, measuring 13cm x 13cm to allow the movement of hedgehogs into and out of the Site.

7. Conclusion

It is considered that the proposals will not breach wildlife legislation, national or local planning policies, subject to the recommendations as outlined in section 6.2 being followed.

Appendix 1: Site Photos and Proposed Plans

Alt



Figure A: Photo showing current access to the site from Mantles Lane.



Figure B: Photo showing TN1.



BNG
Y

Figure C: Photo showing TN1 and L1.



Figure D: Photo showing TN2 and L1.



Figure E: Photo showing T1.



Figure F (Blueline):
Photo showing TN1.



Figure G (Blueline):
Photo showing
flooding in TN1.



Figure H (Blueline):
Photo showing TN3.



Figure I: Photo showing potential field vole burrows and runways which were observed throughout TN1 within the blue line boundary.



Figure J: Photo showing example of WF1



Figure K: Photo showing WF2.



Figure L: Photo showing example of WF3.



Figure M: Photo showing WF4 with droppings.



Figure N: Photo showing WF4 with droppings.



Figure O: Photo showing WF4.



Figure P: Photo showing WF5.

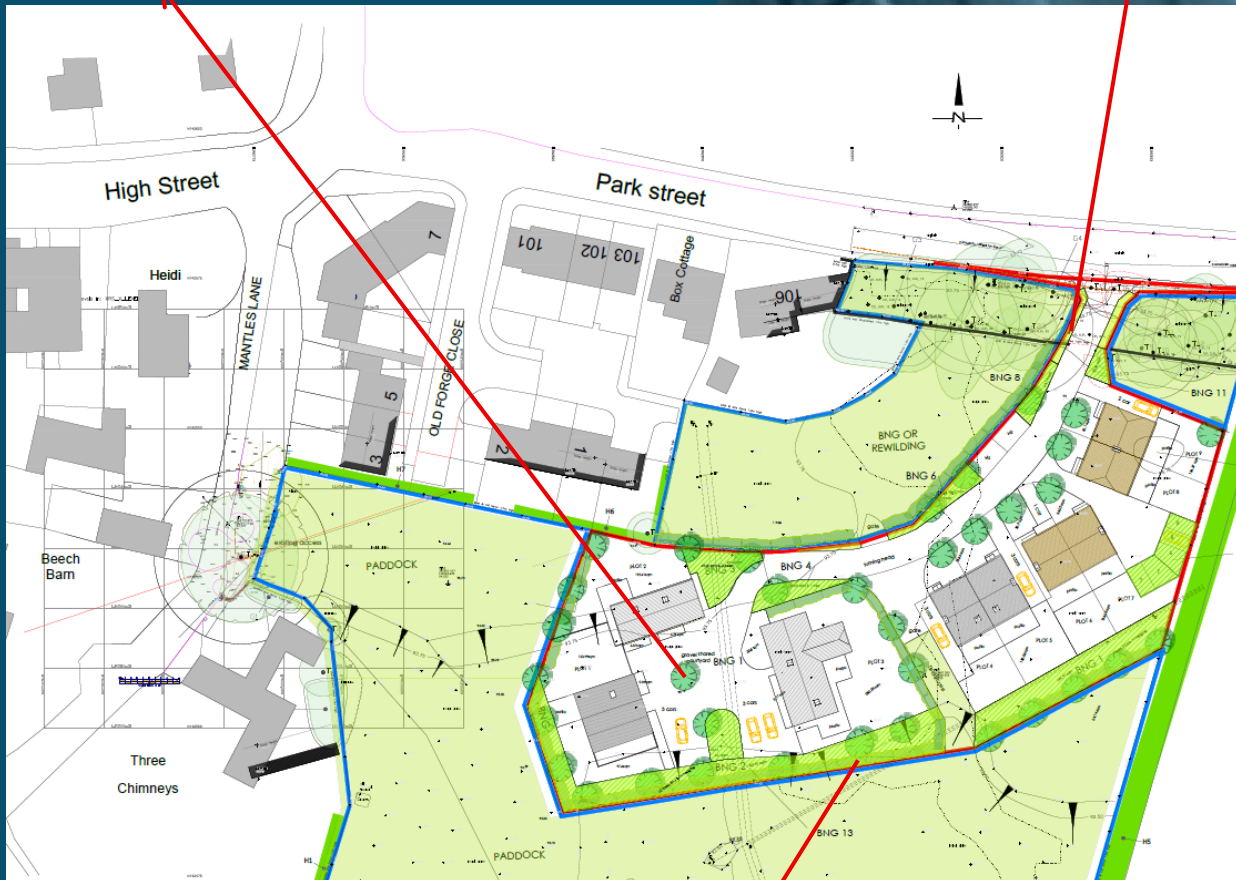


Figure Q: Photo showing WF6.



Any new trees on site should ideally be from local native stock, such as common crab apple, whitebeam and common hazel.

Any new shrubs should be high nectar producing. The Royal Horticultural Society guide, "RHS Perfect for Pollinators, www.rhs.org.uk/perfectforpollinators" provides a well suited plants list of both native and non-native species.



Any new hedgerow to be planted should be done so with native species comprised of the following: common dogwood, hazel, hawthorn, spindle, and guelder rose.



Eco Hedgehog
Hole Fence Plate



Habibat 001 Bat Box



Bee Brick



Vivara Pro
WoodStone House
Martin Nest Box

Appendix 2: Latin names

Floral species	
Species	Latin name
Annual meadow grass	<i>Poa annua</i>
Barren brome	<i>Bromus sterilis</i>
Bird's-foot trefoil	<i>Lotus corniculatus</i>
Bittersweet	<i>Solanum dulcamara</i>
Bluebells	<i>Hyacinthoides non-scripta</i>
Broad-leaved dock	<i>Rumex obtusifolius</i>
Bulbous buttercup	<i>Ranunculus bulbosus</i>
Carnation sedge	<i>Carex panicea</i>
Chickweed	<i>Stellaria media</i>
Cleavers	<i>Galium aparine</i>
Comfrey	<i>Symphytum officinale</i>
Common bent	<i>Agrostis capillaris</i>
Common bindweed	<i>Calystegia sepium</i>
Common dock	<i>Rumex obtusifolius</i>
Common fleabane	<i>Pulicaria dysenterica</i>
Common nettle	<i>Urtica dioica</i>
Common ragwort	<i>Jacobaea vulgaris</i>
Common reed	<i>Phragmites australis</i>
Common sorrel	<i>Rumex acetosa</i>
Common ivy	<i>Hedera helix</i>
Common thistle	<i>Cirsium vulgare</i>
Cocks-foot	<i>Dactylis glomerata</i>
Cows parsley	<i>Anthriscus sylvestris</i>
Cranesbill	<i>Geranium dissectum</i>
Creeping bent	<i>Agrostis stolonifera</i>
Creeping buttercup	<i>Ranunculus repens</i>
Creeping cinquefoil	<i>Potentilla reptans</i>
Crested dogs-tail	<i>Cynosurus cristatus</i>
Cut-leaved cranesbill	<i>Geranium dissectum</i>
Dandelion	<i>Taraxacum officinale</i>
Devil's-bit scabious	<i>Succisa pratensis</i>
Dog's mercury	<i>Mercurialis perennis</i>
Dove's-foot crane's-bill	<i>Geranium molle</i>
Dyer's greenweed	<i>Genista tinctoria</i>
False oat grass	<i>Arrhenatherum elatius</i>
Field bindweed	<i>Convolvulus arvensis</i>
Floating sweet-grass	<i>Glyceria fluitans</i>
Garlic mustard	<i>Alliaria petiolata</i>
Great mullein	<i>Verbascum thapsus</i>
Germander speedwell	<i>Veronica chamaedrys</i>
Ground ivy	<i>Glechoma hederacea</i>
Mary sedge	<i>Carex hirta</i>
Hawksbeard	<i>Crepis</i>
Heath spotted-orchid	<i>Dactylorhiza maculata</i>
Hedge bedstraw	<i>Galium mollugo</i>



Hedge woodruff	<i>Galium odoratum</i>
Hedge woundwort	<i>Stachys sylvatica</i>
Hemlock	<i>Conium maculatum</i>
Herb-Robert	<i>Geranium robertianum</i>
Hogweed	<i>Heracleum sphondylium</i>
Hop	<i>Humulus lupulus</i>
Horse parsley	<i>Smyrniololus olusatrum</i>
Horsetail	<i>Equisetum arvense</i>
Honeysuckle	<i>Lonicera periclymenum</i>
Lilac	<i>Syringa vulgaris</i>
Lady's bedstraw	<i>Galium verum</i>
Lords and ladies	<i>Arum maculatum</i>
Meadow barley	<i>Hordeum secalinum</i>
Meadow buttercup	<i>Ranunculus acris</i>
Meadow foxtail	<i>Alopecurus pratensis</i>
Meadow thistle	<i>Cirsium dissectum</i>
Meadow vetchling	<i>Lathyrus pratensis</i>
Morning glory	<i>Ipomoea purpurea</i>
Oval sedge	<i>Carex ovalis</i>
Oxeye daisy	<i>Leucanthemum vulgare</i>
Ragwort	<i>Senecio jacobaea</i>
Red campion	<i>Silene dioica</i>
Red clover	<i>Trifolium pratense</i>
Red fescue	<i>Festuca rubra</i>
Ribwort plantain	<i>Plantago lanceolata</i>
Rosebay willowherb	<i>Chamerion angustifolium</i>
Rosemary beetle	<i>Chrysolina americana</i>
Roses	<i>Rosa</i> spp.
Rough hawksbeard	<i>Crepis biennis</i>
Rough meadow grass	<i>Poa trivialis</i>
Pendulous sedge	<i>Carex pendula</i>
Pepper-saxifrage	<i>Silene silaus</i>
Perennial rye grass	<i>Lolium perenne</i>
Purple beech	<i>Fagus sylvatica purpurea</i>
Purple orchid	<i>Orchis mascula</i>
Saw-wort	<i>Serratula</i>
Self-heal	<i>Prunella vulgaris</i>
Sharp-flowered rush	<i>Juncus acutiflorus</i>
Shepherd's purse	<i>Capsella bursa pastoris</i>
Silene	<i>Potentilla anserina</i>
Smooth meadow-grass	<i>Poa pratensis</i>
Smooth hawksbeard	<i>Crepis capillaris</i>
Snowberry	<i>Symphoricarpos albus</i>
Snow drops	<i>Galanthus</i>
Soft brome	<i>Bromus hordeaceus</i>
Soft rush	<i>Juncus effusus</i>
Stear thistle	<i>Cirsium vulgare</i>
Spined sedge	<i>Carex spicata</i>
Stitchwort	<i>Stellaria holostea</i>



Sweet vernal grass	<i>Anthoxanthum odoratum</i>
Timothy grass	<i>Phleum pratense</i>
Virginia creeper	<i>Parthenocissus quinquefolia</i>
Wall barley	<i>Hordeum murinum</i>
White clover	<i>Trifolium repens</i>
White dead nettle	<i>Lamium album</i>
Wild onion	<i>Allium vineale</i>
Wild privet	<i>Ligustrum vulgare</i>
Wood avens	<i>Geum urbanum</i>
Wood speedwell	<i>Veronica montana</i>
Yarrow	<i>Achillea millefolium</i>
Yorkshire fog	<i>Holcus lanatus</i>

Tree species	
Species	Latin name
Ash	<i>Fraxinus excelsior</i>
Beech	<i>Fagus sylvatica</i>
Blackthorn	<i>Prunus spinosa</i>
Bramble	<i>Rubus fruticosus agg</i>
Buddleia	<i>Buddleja davidii</i>
Bird cherry	<i>Prunus padus</i>
Canadian poplar	<i>Populus × canadensis</i>
Common buckthorn	<i>Rhamnus cathartica</i>
Dog rose	<i>Rosa canina</i>
Dogwood	<i>Cornus sanguinea</i>
Elder	<i>Sambucus nigra</i>
Elm	<i>Ulmus procera</i>
Field maple	<i>Acer campestre</i>
Garden privet	<i>Ligustrum ovalifolium</i>
Goat willow	<i>Salix caprea</i>
Grey poplar	<i>Populus × canescens</i>
Hawthorn	<i>Crataegus monogyna</i>
Hazel	<i>Corylus avellana</i>
Highbush cranberry	<i>Viburnum trilobum</i>
Holly	<i>Ilex aquifolium</i>
Hornbeam	<i>Carpinus betulus</i>
Horse chestnut	<i>Aesculus hippocastanum</i>
Lime	<i>Tilia cordata</i>
Oak	<i>Quercus robur</i>
Plum	<i>Prunus domestica</i>
Rowan	<i>Sorbus aucuparia</i>
Scot pine	<i>Pinus sylvestris</i>
Silver birch	<i>Betula pendula</i>
Spindle	<i>Euonymus europaeus</i>
Sweet chestnut	<i>Cryphonectria parasitica</i>
Sycamore	<i>Acer pseudoplatanus</i>
Witchharing tree	<i>Viburnum lantana</i>



<i>Mammal species</i>	
Species	Latin name
Badger	<i>Meles meles</i>
Brown hare	<i>Lepus europaeus</i>
Hazel dormice	<i>Muscardinus avellanarius</i>
Hedgehog	<i>Erinaceus europaeus</i>
Otter	<i>Lutra lutra</i>
Water vole	<i>Arvicola amphibius</i>

<i>Bat species</i>	
Species	Latin name
Alcathoe	<i>Myotis alcathoe</i>
Barbastelle	<i>Barbastella barbastellus</i>
Bechstein's	<i>Myotis bechsteinii</i>
Brandt's	<i>Myotis brandtii</i>
Brown long-eared	<i>Plecotus auritus</i>
Common pipistrelle	<i>Pipistrellus pipistrellus</i>
Daubentons	<i>Myotis daubentoniid</i>
Greater horseshoe	<i>Rhinolophus ferrumequinum</i>
Greater mouse-eared	<i>Myotis myotis</i>
Grey long-eared	<i>Plecotus austriacus</i>
Leislars	<i>Nyctalus leisleri</i>
Lesser horseshoe	<i>Rhinolophus hipposideros</i>
Nathusius's pipistrelle	<i>Pipistrellus nathusii</i>
Natterer's	<i>Myotis nattereri</i>
Noctule	<i>Nyctalus noctula</i>
Serotine	<i>Eptesicus serotinus</i>
Soprano pipistrelle	<i>Pipistrellus pygmaeus</i>
Whiskered	<i>Myotis mystacinus</i>

<i>Bird species</i>	
Species	Latin name
Barn owl	<i>Tyto alba</i>
Bittern	<i>Botaurus stellaris</i>
Blackbird	<i>Turdus merula</i>
Black redstart	<i>Phoenicurus ochruros</i>
Blue tit	<i>Cyanistes caeruleus</i>
Bullfinch	<i>Pyrrhula pyrrhula</i>
Buzzard	<i>Buteo buteo</i>
Common crow	<i>Corvus corone</i>
Curlew	<i>Numenius Arquata</i>
Coal tit	<i>Periparus ater</i>
Common buzzard	<i>Buteo buteo</i>
Common gull	<i>Larus canus</i>
Common quail	<i>Coturnix coturnix</i>
Common redpoll	<i>Acanthis flammea</i>
Commonunting	<i>Emberiza calandra</i>
Crossbill	<i>Loxia curvirostra</i>



Dipper	<i>Cinclus cinclu</i>
Dunnoek	<i>Prunella modularis</i>
Eurasian hobby	<i>Falco subbuteo</i>
Fire crest	<i>Regulus ignicapilla</i>
Goldcrest	<i>Regulus regulus</i>
Goldfinch	<i>Carduelis carduelis</i>
Goosander	<i>Mergus merganser</i>
Great Bustard	<i>Otis tarda</i>
Great spotted woodpecker	<i>Dendrocopos major</i>
Great tit	<i>Parus major</i>
Greenfinch	<i>Chloris chloris</i>
Green sandpiper	<i>Tringa ochropus</i>
Green woodpecker	<i>Picus viridis</i>
Greylag goose	<i>Anser anser</i>
Grey Partridge	<i>Perdix perdix</i>
Grey wagtail	<i>Motacilla cinerea</i>
Hawfinch	<i>Coccothraustes coccothraustes</i>
Hen harrier	<i>Circus cyaneus</i>
Hobby	<i>Falco subbuteo</i>
House martin	<i>Delichon urbica</i>
House sparrow	<i>Passer domesticus</i>
Jack snipe	<i>Lymnocyptes minimus</i>
Kingfisher	<i>Alcedo atthis</i>
Kestrel	<i>Falco tinnunculus</i>
Lapwing	<i>Vanellus Vanellus</i>
Lesser spotted woodpecker	<i>Dryobates minor</i>
Little egret	<i>Egretta garzetta</i>
Long-eared Owl	<i>Asio otus</i>
Magpie	<i>Pica pica</i>
Mandarin duck	<i>Aix galericulata</i>
Merlin	<i>Falco columbarius</i>
Mistle thrush	<i>Turdus viscivorus</i>
Moorhen	<i>Gallinula chloropus</i>
Nuthatch	<i>Sitta europaea</i>
Osprey	<i>Pandion haliaetus</i>
Peregrine	<i>Falco peregrinus</i>
Pigeon	<i>Columba livia domestica</i>
Redshank	<i>Tring tetanus</i>
Redstart	<i>Phoenicurus phoenicurus</i>
Reed bunting	<i>Emberiza schoeniclus</i>
Red kite	<i>Milvus milvus</i>
Robin	<i>Erithacus rubecula</i>
Siskin	<i>Spinus spinus</i>
Siskylark	<i>Alauda arvensis</i>
Song thrush	<i>Turdus philomelos</i>
Sparrowhawk	<i>Accipiter nisus</i>
Spotted flycatcher	<i>Muscicapa striata</i>
Starling	<i>Sturnus vulgaris</i>
Stone curlew	<i>Burhinus oediconemus</i>



Swallow	<i>Hirundo rustica</i>
Swift	<i>Apus apus</i>
Tawny owl	<i>Strix aluco</i>
Treecreeper	<i>Certhia familiaris</i>
Tree sparrow	<i>Passer montanus</i>
Turtle dove	<i>Streptopelia turtur</i>
Tundra swan	<i>Cygnus columbianus</i>
Whimbrel	<i>Numenius phaeopus</i>
Wood pigeon	<i>Columba palumbus</i>
Wren	<i>Troglodytes troglodytes</i>
Yellow-browed warbler	<i>Phylloscopus inornatus</i>
Yellow wagtail	<i>Motacilla flava</i>

Butterfly species	
Species	Latin name
Brown hairstreak butterfly	<i>Thecla betulae</i>
Crayling	<i>Hipparchia semele</i>
Duke of Burgundy butterfly	<i>Hamearis lucina</i>
Grizzled skipper	<i>Pyrgus malvae</i>
Marsh fritillary	<i>Eurodryas aurinia</i>
Meadow brown	<i>Maniola jurtina</i>
Red admiral	<i>Vanessa atalanta</i>
Ringlet	<i>Aphantopus hyperantus</i>
Silver washed fritillary	<i>Argynnis paphia</i>
Small Copper	<i>Lycaena pheas</i>
Speckled wood	<i>Pararge aegeria</i>
Wall brown	<i>Lasiommata megera</i>

Invertebrate species	
Species	Latin name
Beautiful demoiselle	<i>Calopteryx virgo</i>
Blue ground beetle	<i>Carabus intricatus</i>
Bramble moth	<i>Epiblema uddmanniaria</i>
Buff ermine	<i>Spilarctia luteum</i>
Caddies fly	<i>Enicocampa pusilla</i>
Cinnabar moth	<i>Tyria jacobaeae</i>
Common hawk	<i>Aeshna juncea</i>
Gnat	<i>Trichocerca larva</i>
Honeybee	<i>Apis mellifera</i>
Longhorn beetle	<i>Coccinellidae</i>
Mediterranean oil beetle	<i>Meloe mediterraneus</i>
Wedge	<i>Culicoides impunctatus</i>
Mullein moth	<i>Cucullia verbasci</i>
Pale-palped spring beegrabber	<i>Myopa pellucida</i>
Rugged oil beetle	<i>Meloe rugosus</i>
Scarlet tiger moth	<i>Callimorpha dominula</i>



Reptile and amphibian species

Species	Latin name
Adder	<i>Vipera berus</i>
Common lizard	<i>Zootoca vivipara</i>
Common toad	<i>Bufo bufo</i>
Grass snake	<i>Ix helvetica</i>
Great crested newt	<i>Triturus cristatus</i>
Natterjack toad	<i>Epidalea calamita</i>
Palmate newt	<i>Lissotriton helveticus</i>
Pool frog	<i>Pelophylax lessonae</i>
Sand lizard	<i>Lacerta agilis</i>
Slow worm	<i>Anguis fragilis</i>
Smooth newt	<i>Lissotriton vulgaris</i>
Smooth snake	<i>Coronella austriaca</i>



Appendix 3: Relevant Wildlife Legislation & Relevant National and Local Policies

Conservation of Habitats and Species Regulations 2017 (as amended)

The Conservation of Habitats and Species Regulations 2017 (SI No. 2017/1012) are the principal means by which the European Habitats Directive is transposed in England and Wales.

The Regulations provide for the designation and protection of a network of 'European Sites' termed Natura 2000, the protection of 'European protected species', and the adaptation of planning and other controls for the protection of European Sites.

These Regulations transpose Council Directive 92/43/EEC¹² on the conservation of natural habitats and of wild fauna and flora (OJ No. L 206, 22.7.1992, p.7) ("the Habitats Directive"). This establishes protected wildlife sites across the European Union, known as 'Natura 2000'. This network consists of designated sites, including Special Areas of Conservation (SACs) designated under the Habitats Directive and Special Protection Areas (SPAs) designated under the Birds Directive (Council Directive 79/409/EEC)¹³. These sites form part of a series of measures aimed at conserving important and threatened habitats and species.

These Regulations consolidate the Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007 (S.I. 2007/1842) with subsequent amending instruments, and make minor modifications reflecting changes to related legislation. The instruments being consolidated by these Regulations made, amongst things, provision for implementing Council Directive 2009/147/EC on the conservation of wild birds (OJ No. L20, 26.01.2010, p.7.) and Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (OJ No. L206, 22.7.92, p.7) in relation to marine areas where the United Kingdom has jurisdiction beyond its territorial sea. The Regulations make provision in relation to the offshore marine area, offshore marine installations and certain ships and aircraft. The "offshore marine area" is defined in regulation 2(1).

Regulation 43 relates to the protection of European protected species listed under Schedule 2 of the Regulations. Taken together it is an offence to undertake the following acts with regard to European Protected Species:

- deliberately capture, injure or kill any wild animal of a European Protected Species;



¹² European Commission (1992). Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora. European Commission, Brussels.

¹³ European Commission (1979). Council Directive 79/409/EEC on the conservation of wild birds. European Commission, Brussels.

- deliberately disturb animals of any such species in such a way as to be likely to: impair their ability to survive, breed, rear or nurture their young, hibernate or migrate, or
- affect significantly the local distribution or abundance of the species to which they belong;
- deliberately take or destroy the eggs of such an animal; or
- damage or destroy a breeding site or resting place of such an animal.

The disturbance offence is generally taken to refer to a discernible effect at population level and biogeographic level, rather than simply to an individual animal. However, in certain circumstances the disturbance of one individual animal may have population level effects.

The Regulations also make it an offence (subject to exceptions) to deliberately pick, collect, cut, uproot, destroy, or trade in the plants listed in Schedule 5.

However, the actions listed above can be made lawful through the granting of licences (European Protected Species Licence) by the appropriate authorities (Natural England in England). Licences may be granted for a number of purposes (such as science and education, conservation, preserving public health and safety), but only after the appropriate authority has determined that the following regulations are satisfied:

- the works under the licence are being carried out for the purposes of 'preserving public health and public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment';
- there is 'no satisfactory alternative'; and
- the action 'will not be detrimental to the maintenance of the population of the species concerned at favourable conservation status in their natural range'.

The Wildlife and Countryside Act 1981¹⁴

The Wildlife and Countryside Act 1981 (as amended) is the principal piece of UK legislation relating to the protection of wildlife. It consolidates and amends existing national legislation to implement the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) and Council Directive 79/409/EEC on the Conservation of Wild Birds (Birds Directive) in Great Britain.



The Act makes it an offence (with exception to species listed in Schedule 2) to intentionally kill, injure, or take any wild bird or their eggs or nests. Special penalties are available for offences related to birds listed on Schedule 1, for which there are additional offences of disturbing these birds at their nests, or their dependent young. The Secretary of State may also designate Special Protection Areas

¹⁴ Secretary of State, 1981. Wildlife and Countryside Act. Her Majesty's Stationery Office.

(subject to exceptions) to provide further protection to birds. The Act also prohibits certain methods of killing, injuring, or taking birds, restricts the sale and possession of captive bred birds, and sets standards for keeping birds in captivity.

The Act makes it an offence (subject to exceptions) to intentionally kill, injure, or take, possess, or trade in any wild animal listed in Schedule 5, and prohibits interference with places used for shelter or protection, or intentionally disturbing animals occupying such places. The Act also prohibits certain methods of killing, injuring, or taking wild animals listed in Schedule 6.

The Act makes it an offence (subject to exceptions) to pick, uproot, trade in, or possess (for the purposes of trade) any wild plant listed in Schedule 8, and prohibits the unauthorised intentional uprooting of such plants.

The Act contains measures for preventing the establishment of non-native species which may be detrimental to native wildlife, prohibiting the release of animals and planting of plants listed in Schedule 9. It also provides a mechanism making any of the above offences legal through the granting of licences by the appropriate authorities.

The Countryside and Rights of Way Act 2000¹⁵

The Countryside and Rights of Way Act 2000 (CROW) was passed to provide additional levels of protection for wildlife whilst also strengthening the protection afforded to Sites of Special Scientific Interest.

Schedule 12 of the Act amends the Wildlife and Countryside Act 1981, strengthening the legal protection for threatened species. The provisions make certain offences 'arrestable', create a new offence of 'reckless' disturbance, confer greater powers to police and wildlife inspectors for entering premises and obtaining wildlife tissue samples for DNA analysis, and enable heavier penalties on conviction of wildlife

Natural Environment and Rural Communities Act 2006

The Natural Environment and Rural Communities Act 2006 (NERC) is designed to help achieve a rich and diverse natural environment and thriving rural communities through modernised and simplified arrangements for delivering Government policy.

It was created to make provision in connection with wildlife, Sites of Special Scientific Interest, National Parks and the Broads; to amend the law relating to rights of way; to make provision as to the Inland Waterways Amenity Advisory Council; to provide for flexible administrative arrangements in



¹⁵ Secretary of State, 2000. The Countryside and Rights of Way Act. Her Majesty's Stationery Office.

connection with functions relating to the environment and rural affairs and certain other functions; and for connected purposes.

Section 40 of NERC carries an extension of the earlier CRow Act biodiversity duty to public bodies and statutory undertakers to ensure due regard to the conservation of biodiversity. Section 41 requires the Secretary of State, as respects England, to publish a list of the living organisms and types of habitat which in the Secretary of State's opinion are of principal importance for the purpose of conserving biodiversity. The updated S41 list, published in August 2010, identified 56 habitats and 943 species of principal importance.

The Wild Mammals (Protection) Act 1996

The Wild Mammals (Protection) Act 1996 makes it an offence for any person to mutilate, kick, beat, nail or otherwise impale, stab, burn, stone, crush, drown, drag or asphyxiate any wild mammal with intent to inflict unnecessary suffering.

The Animal Welfare Act 2006

Prior to the Animal Welfare Act 2006, people only had a duty to ensure that an animal didn't suffer unnecessarily. The new Act keeps this duty but also imposes a broader duty of care on anyone responsible for an animal to take reasonable steps to ensure that the animal's needs are met. This means that a person has to look after the animal's welfare as well as ensure that it does not suffer. The Act says that an animal's welfare needs include:

- a suitable environment (how it is housed);
- a suitable diet (what it eats and drinks);
- the ability to exhibit normal behaviour patterns;
- any need it has to be housed with, or apart from, other animals; and
- protection from pain, suffering, injury and disease.

With regards to development, this may have implications when translocations of animals are proposed. As such, care must be taken to ensure that any receptor sites are suitable for the species in terms of habitat and carrying capacity.



National Planning Policy Framework

The National Planning Policy Framework has recently been revised in response to the Proposed reforms to the National Planning Policy Framework and other changes to the Planning system consultation on 12 December 2024, and sets out the government's planning policies for England and how these are expected to be applied.

This revised framework replaces the previous National Planning Policy Framework published in March 2012, revised in July 2018, updated in February 2019, revised in July 2021, updated in September 2023 and revised in December 2023.

The NPPF places a presumption in favour of sustainable development.

'Planning policies and decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans, and

f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.'

If a protected species is present it becomes a material consideration for a local planning authority dealing with planning application for any development that would be likely to result in harm



to the species or its habitat. Circular 06/2005¹⁶: Biodiversity and geological conservation, prepared in support of the former PPS9, provides substantiated guidance on how the law is applied in relation to planning and nature conservation.

Biodiversity Action Plans

The UK BAP lists are delineated as statutory lists of priorities in England, Scotland, Wales and Northern Ireland. In England, there are 56 habitats of principal importance and 943 species of principal importance.

Local Planning Policy

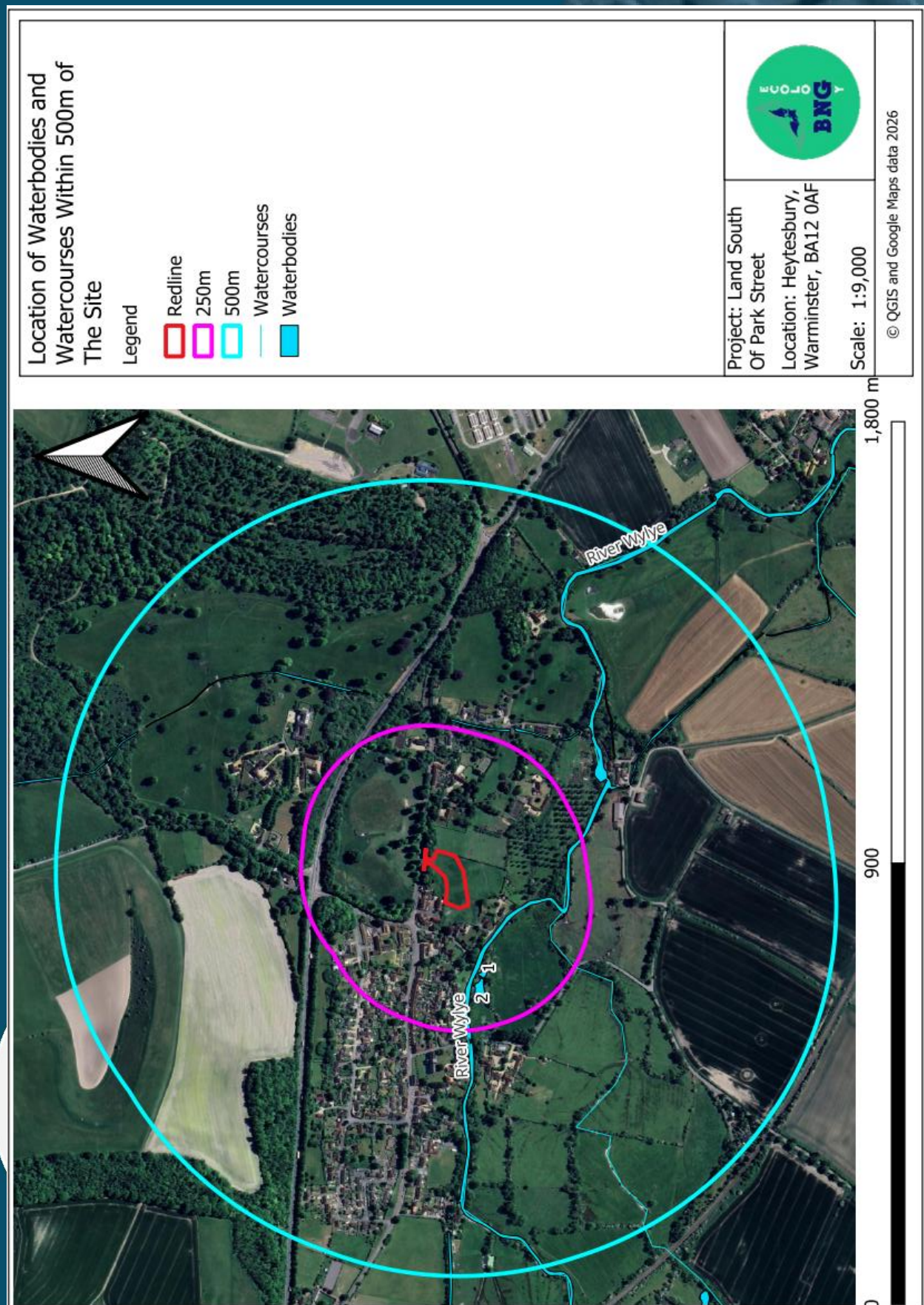
Wiltshire and Swindon Local Nature Recovery Plan was published in 2025 and provides a clear framework to reserve biodiversity decile and build resilience across the county's landscapes. It prioritises nine mapped priority habitats that are of BNG Strategic Significance including:

- Calcareous Grassland
- Neutral Grassland
- Woodland
- Heathland, Acid Bogs and Acid Grassland,
- Mixed Habitats
- Open Mixed Habitats
- Rivers, Streams and Wetlands
- Chalk Rivers
- Nature on Our Doorstep



¹⁶ ODPM Circular 06/2005 Government Circular: Biodiversity and Geological Conservation – Statutory Obligations and their Importance within the Planning System.

Appendix 4: Location of Waterbodies and Watercourses Within 500m of The Site



Appendix 5: Listed Habitats, UK Biodiversity Action Plan Habitat and Irreplaceable Habitat Locations within 2km of the Site



Designations		Habitats	
Land-Based Designations		Grassland	
Statutory		Priority Habitat Inventory - Coastal and Floodplain Grazing Marsh (England)	
Sites of Special Scientific Interest (England)		Priority Habitat Inventory - Good quality semi-improved grassland (Non Priority) (England)	
Sites of Special Scientific Interest (England)		Priority Habitat Inventory - Lowland Calcareous Grassland (England)	
Special Areas of Conservation (England)		Woodland	
Special Areas of Conservation (England)		Priority Habitat Inventory - Deciduous Woodland (England)	
Nutrient Neutrality Catchments		Priority Habitat Inventory - Traditional Orchards (England)	
		Woodpasture and Parkland BAP Priority Habitat (England)	

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opportunity-areas-england/explore?location=51.532706%2C-2.480738%2C17.48](https://naturalengland-defra.opendata.arcgis.com/datasets/Defra::gcn-strategic-opportunity-areas-england/explore?location=51.532706%2C-2.480738%2C17.48)



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