



Biodiversity Net Gain Design Stage Report
Malmesbury Primary School, Footpath Extension
Daniel Connal Partnership
March 2026
IES/2025/134/Version 1.0

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QUALITY ASSURANCE

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NON-TECHNICAL SUMMARY

Purpose of Report

This report is designed to provide a Biodiversity Net Gain Assessment of the proposals to the land adjacent to Malmesbury Primary School, Tetbury Hill, Malmesbury SN16 9JR and centred on Grid Reference ST92910 87907.

Methodology

A BNG Assessment was undertaken using the appropriate Defra metric. This was supported by a walkover survey of the site using the UK Hab survey methodology. Calculations were completed using the Statutory Defra BNG metric.

Biodiversity Net Gain

The survey and analysis using the Biodiversity Metric tool found the site baseline to be 0.29 Habitat Units and 0.25 Hedgerow Units. The proposals to redevelop the site including landscaping will deliver 0.29 Habitat Units and 0.03 Hedgerow Units. This change in Habitat Units represents a Biodiversity Net Gain increase of 102.03% Habitat Units and 12.51% Hedgerow Units.

Additional Requirements

The following additional actions are required to deliver on BNG commitments:

- A sensitive lighting scheme to retain dark corridors at the perimeter of the site

Conclusions

The BNG Assessment has shown the scheme will deliver 102.03% BNG habitat units and 12.51% BNG hedgerow units, which exceeds the national target of 10%.

1 INTRODUCTION

1.1 Background

1.1.1 IES Consulting were instructed by Daniel Connal Partnership to undertake a UK Habs habitat survey at the land adjacent to Malmesbury Primary School, Tetbury Hill, Malmesbury SN16 9JR and centred on Grid Reference ST92910 87907. A site location plan can be seen in **Figure 1**.

1.1.2 The purpose of this report is to:

- Complete a site survey to quantify and assess the types and conditions of all habitats within the redline boundary.
- Use the Defra Biodiversity Metric to quantify the Biodiversity Net Gain balance of the proposals;
- Where necessary work with the design team to achieve a minimum 10% Biodiversity Net Gain as a requirement of planning,
- Present the findings of the work in a document for planning.

1.1.3 This report was authored by Daisy Bradley-White (BSc (Hons)), who has over 4 years' experience of ecological surveying, and Tilly Tilbrook, (MSc CEcol MCIEEM) who has over 23 years' experience of ecological surveying.

1.2 Site Description

1.2.1 The site is situated to the south of Malmesbury Primary School and is currently an area of modified grassland bordered by a native hedgerow.

1.2.2 The wider landscape around Malmesbury town is predominantly countryside.

1.3 Development Proposals

1.3.1 It is proposed to develop the site into a permanent pedestrian access route and temporary vehicle access route during construction for the proposed extension of Malmesbury Church of England Primary School (Application reference:PL/2025/07919).

1.3.2 The scheme is being submitted for full planning permission, and the design is fixed. The following assumptions have been made:

- A one-year delay in starting habitat creation has been assumed across the site to accord with time to strip the site and complete the development.

1.4 Planning Policy, Legislation and Guidance

Planning Policy

1.4.1 A review of planning policy was undertaken to inform this report, and this is summarised below. Full details of the planning policy relevant to the site can be found in **Appendix A**.

National Policy

- National Planning Policy Framework (February 2025) - this document is a material consideration in planning decisions, and states that planning policies and decisions should provide net gains for biodiversity.

Local Policy

- The Wiltshire Core Strategy - Policy 50 outlines how development proposals must demonstrate how they protect features of nature conservation value.
- Bats Special Areas of Conservation (SAC) Planning Guidance for Wiltshire - This document lays out the expectations with respect to bats relating to the SACs for this group in Wiltshire.

1.5 Legislation

1.5.1 The following legislation has been taken into account when preparing this report, and full details are given in **Appendix A**.

- **The Environment Act 2021** - this provides clear statutory targets for recovery in four priority areas: air quality; biodiversity; water and waste. It includes a target to reverse the decline in species abundance by 2030, and provides a legal framework for mandatory 10% biodiversity net gain on development sites.
- **The Conservation of Habitats and Species Regulations 2017** - this provides protection for European Protected Species and European Protected Sites.
- **The Town and Country Planning (Environmental Impact Assessment) Regulations 2017** - this provides a framework to identify developments which must carry out an Environmental Impact Assessment (EIA).
- **The Natural Environment and Rural Communities Act 2006** - this extends the duties of public bodies in relation to biodiversity. It establishes the Section 41 species and habitats of principal importance for the purpose of conserving biodiversity, which need to be taken into account by a public body when performing any of its functions.

- **The Countryside and Rights of Way Act 2000** - this act places a duty on Government departments and the National Assembly for Wales to have regard for the conservation of biodiversity, and to maintain lists of species and habitats for which conservation steps should be taken or promoted, in accordance with the Convention on Biological Diversity. It strengthens the legal protection for species named on the Wildlife and Countryside Act 1981 and creates a new offence of reckless disturbance.
- **The Hedgerow Regulations 1997** - this provides protection for hedgerows classified as 'important' under the regulations.
- **The Protection of Badgers Act 1992** - this provides legal protection to badgers and their setts, making it an offence to kill, injure or take a badger, or to damage or interfere with a sett unless you have a licence.
- **The Wildlife and Countryside Act 1981** - this act provides legal protection for wild birds, Sites of Special Scientific Interest, plants, reptiles and other amphibians and other animals, and makes it a criminal offence to kill, injure or take those species listed in the act, and to damage, obstruct or destroy their resting places, or disturb them in their resting places.

1.6 Guidance

1.6.1 This report has been prepared in accordance with the following guidelines:

- CIEEM Guidelines for Preliminary Ecological Appraisal, 2nd Edition.
- CIEEM Guidelines on Ecological Report Writing.
- CIEEM Guidelines on Biodiversity Net Gain Report and Audit Templates¹.
- Biodiversity Net Gain - Good Practice Principles for Development.
- Biodiversity Net Gain - Good Practice Principles for Development Part A: A practical guide & Part B: Case Studies.
- BS42020:2013 Biodiversity - Code of Practice for Planning and Development.
- BS8683:2021 Process for designing and implementing Biodiversity Net Gain. Specification.

¹ Note: This guidance was produced in 2021 and has been superseded by Government advice on when detailed designs and Habitat Management and Monitoring Plans are required, therefore implementation and management/monitoring sections have not been included at this stage.

2 METHODOLOGY

2.1 Desk Study

2.1.1 The purpose of the desk study is to review information available in the public domain. Information about designated sites, important habitats and protected and otherwise important species was obtained for the Site and an area within a 2km radius of the site. The survey radius was increased to 5km for bat species as this group of species can move within this range. It was also increased to 5km for Special Protection Areas (SPAs) and Special Areas of Conservation (SACs).

2.1.2 Data was obtained from the following sources on 21st November 2024:

- NBN Atlas.
- MAGIC.
- Local Planning Authority Website Interactive Mapping.
- Wiltshire & Swindon Biological Records Centre

2.1.3 This report should be read in conjunction with:

- Malmesbury Primary School, Preliminary Ecological Appraisal Report, IES Consulting (2026)
- Malmesbury Primary School, Biodiversity Net Gain Design Stage Report, IES Consulting (2026)
- Malmesbury Primary School, Footpath Extension, IES Consulting (2026)
- Bat Static Survey & Climbed Inspection Report, IES Consulting (2025)

2.2 Field Survey

2.2.1 The survey was conducted on 27th January 2026 by Daisy Bradley-White BSc who has over 4 years' experience in ecological surveying, and Bitsy Pout MSc who has over 2 years' experience in ecological surveying. The extent of the survey area can be seen in **Figure 2**.

2.2.2 A walkover survey to UK Hab standard methodology was undertaken to map and assess habitat parcels to inform the metric calculation scores. This included walking over the site and delineating stands of contrasting plant communities then undertaking botanical survey and condition assessment of each habitat compartment to account for variations within the habitat types. Full condition assessments of each habitat parcel were recorded in the field using the Coreo UK Hab app.

2.2.3 In accordance with the UK Hab methodology, the minimum mappable unit (MMU) for this survey was 25 m², and the minimum width for a linear feature to be mapped as a polygon was >1m. The minimum length for a linear feature to be mapped was 5m. This followed the protocol for fine scale mapping under the UK Hab methodology. Linear

features which were less than 1m wide were mapped as lines rather than polygons and therefore took up no area within the calculations.

2.3 Biodiversity Net Gain Calculations

2.3.1 Calculations were made using the statutory Defra Biodiversity Metric which is run on Microsoft Excel. All Baseline habitat types were included in the Metric including: habitat parcels; point features such as trees; linear features such as hedgerows; and linear aquatic features such as rivers and streams. Each habitat type was scored for area, habitat distinctiveness, condition, ecological connectivity and strategic position.

2.3.2 On site habitat creation figures were derived from the Landscape Plan (**Figure 3**) and entered in the Metric Tool to calculate the resulting Biodiversity Net Gain values. Full details explaining how the Metric can be used and the rules in applying it are found in the Defra User Guides².

² The Statutory Biodiversity Metric User Guide. July 2024. Defra

3 BASELINE ECOLOGICAL CONDITIONS

3.1 Important Ecological Features

Designated Sites

3.1.1 The following designated sites were noted within, adjacent to or within 500m of the site boundary:

Table 1: Summary of Designated Sites

Site Name	Designation	Distance and Direction from Site	Reason for Designation
Conygre Mead	LNR	500m, SE	Broadleaved woodland/Calcareous grassland
Bristol Avon River	LWS	0.3km S	River and its green corridors, provides essential habitats for birds, insects and fish. Kingfishers, dragonflies and water voles and otters found in the river and associated habitats.

Protected or Otherwise Important Species

Table 2: Summary of Protected or Otherwise Important Species.

Common Name	Latin Name	European Legal Protection	UK Legal Protection	S41
Greater horseshoe bat	<i>Rhinolophus ferrumequinum</i>	Y	Y	Y
Lesser horseshoe bat	<i>Rhinolophus hipposideros</i>	Y	Y	Y
Barbastelle bat	<i>Barbastella barbastellus</i>	Y	Y	Y
Serotine bat	<i>Eptesicus serotinus</i>	Y	Y	N
Natterer's bat	<i>Myotis nattereri</i>	Y	Y	N
Noctule bat	<i>Nyctalus noctula</i>	Y	Y	Y
Daubenton's	<i>Myotis daubentonii</i>	Y	Y	N
Common pipistrelle bat	<i>Pipistrellus pipistrellus</i>	Y	Y	N
Nathusius's pipistrelle bat	<i>Pipistrellus nathusii</i>	Y	Y	N

Common Name	Latin Name	European Legal Protection	UK Legal Protection	S41
Soprano pipistrelle bat	<i>Pipistrellus pygmaeus</i>	Y	Y	Y
Brown long-eared bat	<i>Plecotus auritus</i>	Y	Y	Y
European hedgehog	<i>Erinaceus europaeus</i>	N	Y	Y
Brown hare	<i>Lepus europaeus</i>	N	Y	Y
Slow-worm	<i>Anguis fragilis</i>	N	Y	Y
Common toad	<i>Bufo bufo</i>	N	Y	Y
Badger	<i>Meles meles</i>	N	Y	N
Spotted Flycatcher	<i>Muscicapa striata</i>	Y	N	Y
Song Thrush	<i>Turdus philomelos</i>	N	N	Y
Dunnock	<i>Prunella modularis</i>	Y	Y	Y
Grass snake	<i>Natrix helvetica</i>	N	Y	Y
Marsh tit	<i>Poecile palustris</i>	Y	Y	Y
Reed Bunting	<i>Emberiza schoeniclus</i>	Y	Y	Y
Ring ouzel	<i>Turdus torquatus</i>	Y	Y	Y
Tree Pipit	<i>Anthus trivialis</i>	Y	Y	Y
House sparrow	<i>Passer domesticus</i>	Y	Y	Y
Lesser redpoll	<i>Acanthis cabaret</i>	Y	Y	Y
Herring gull	<i>Larus argentatus</i>	Y	Y	Y
Yellowhammer	<i>Emberiza citrinella</i>	Y	Y	Y
House sparrow	<i>Psser domesticus</i>	Y	Y	Y
Skylark	<i>Alauda arvensis</i>	N	Y	Y
Spotted Flycatcher	<i>Muscicapa striata</i>	Y	N	Y

Habitats

G4 - Modified Grassland

3.1.2 The majority of the site is comprised of unmanaged, tussocky modified grassland (Plate 1).



Plate 1: Modified grassland parcel

Table 3: Modified Grassland Species List

Common Name	Latin Name	Abundance on DAFOR Scale
Perennial Rye-grass	<i>Lolium perenne</i>	D
Dandelion	<i>Taraxacum spp.</i>	F
Creeping Buttercup	<i>Ranunculus repens</i>	A
Cock's-foot	<i>Dactylis glomerata</i>	A
Yorkshire-fog	<i>Holcus lanatus</i>	A
Common Nettle	<i>Urtica dioica</i>	F
Bramble	<i>Rubus fruticosus agg.</i>	O
Common sorrel	<i>Rumex acetosa</i>	F
Cleavers	<i>Galium aparine</i>	R
Hedgerow Crane's-bill	<i>Geranium pyrenaicum</i>	O

Common Name	Latin Name	Abundance on DAFOR Scale
Blackthorn	<i>Prunus spinosa</i>	0

Table 4: Modified Grassland Condition Score

Condition Criteria	True/False	Rationale
A: There are 6-8 vascular plant species per m ² present, including at least 2 forbs.	False	The number of species per m ² is below the required threshold of 6–8 species per m ² .
B: Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20 per cent is more than 7 cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed.	True	Varied sward height present.
C: Scrub accounts for less than 20% of total grassland area.	True	There was no scrub habitat present in this area of land.
D: Physical damage evident in less than 5% of total grassland area.	True	No evidence of significant physical damage was recorded.
E: Cover of bare ground between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens).	True	No bare ground on site.
F: Cover of bracken is <20%.	True	Bracken is absent.
G: There is an absence of invasive non-native species (as listed on Schedule 9 of WCA, 1981)	True	None of the plant species noted are Schedule 9 invasive non-natives under the Wildlife and Countryside Act 1981.
Score	1	Poor

H2A - Native Hedgerow

3.1.3 One native hedgerow borders the sites fenceline; it is made up of exclusively bramble (Plate 2).



Plate 2: Native Hedgerow

Table 5: Native Hedgerow Species List

Common Name	Latin Name	Abundance on DAFOR Scale
Bramble	<i>Rubus fruticosus</i>	D

Table 6: Native Hedgerow Condition Score

Condition Criteria	True/False Native Hedgerow with trees	True/False Native Hedgerow without trees
A1: >1.5 m average along length?	True	True
A2: >1.5 m average along length?	True	True
B1: Gap between ground and base of canopy <0.5 m for >90% of length?	True	True
B2: Gaps make up <10% of total length; and No canopy gaps >5 m?	True	True

Condition Criteria	True/False Native Hedgerow with trees	True/False Native Hedgerow without trees
C1: >1 m width of undisturbed ground with perennial herbaceous vegetation for >90% of length?	False	False
C2: Plant species indicative of nutrient enrichment of soils dominate <20% cover of the area of undisturbed ground?	False	False
D1: >90% of the hedgerow and undisturbed ground is free of invasive non-native plant species (including those listed on Schedule 9 of WCA ³) and recently introduced species?	True	True
D2: >90% of the hedgerow or undisturbed ground is free of damage caused by human activities?	False	True
E1: There is more than one age-class of tree present and there is on average at least one mature, ancient or veteran tree present per 20 - 50m of hedgerow?	False	n/a
E2: At least 95% of hedgerow trees are in a healthy condition and there is little or no evidence of an adverse impact on tree health by damage from livestock or wild animals, pests or diseases, or human activity.	True	n/a
Score	2 - Moderate	2 - Moderate

Individual Trees

3.1.4 A single Field Maple (*Acer campestre*) tree sits within the red line boundary, the condition sheet can be seen in **Appendix B**.

Species and Species Groups

Plants

3.1.5 No protected or otherwise important plant species were noted during the survey

Invertebrates

3.1.6 The majority of the site provides little habitat suitable for invertebrates due to the lack of floral diversity, sward height and site management.

Amphibians

3.1.7 The tussocky grassland on site contains suitable terrestrial habitat for great crested newts, and this species is known to be present in ponds on the Dyson Headquarters site and on the adjacent Backbridge Farm. However, there are no ponds within 250m of Malmesbury Primary School known to support great crested newts. During the trap and translocate exercise on the Dyson site, great crested newts were only found very close to the ponds or in association with the hedgerows. In addition, a District Level Licence is in place on the adjacent Backbridge Farm site to allow the development to proceed lawfully. There are three new balancing ponds (Plate 3) which have been created on the Backbridge development. One of these is dry, and another contains only a small amount of water. Emergent or aquatic vegetation is present in only one of these ponds and the ponds have a poor Habitat Suitability Index rating.

3.1.8 In addition to this, the construction work proposed at Punter's Farm acts as a significant barrier to newt movement to the Malmesbury school site. Therefore, it is considered highly unlikely that the site supports great crested newts since it is sufficiently isolated from any suitable aquatic habitat.



Plate 3: Dry balancing pond on adjacent Punter's Farm site

Reptiles

3.1.9 Whilst the grassland is suitable to support reptiles, a reptile survey is not deemed necessary to determine the impact of the development on reptiles. This is due to the reptile surveys at Backbridge Farm in 2014 showing a small population of slow worms lived within the vicinity of the Site. In the previous survey, there was a maximum count of 2 adult slow worms across the whole of the adjacent site, and the land immediately adjacent to this plot was included in the survey. Since no land management has changed on the site, it seems reasonable to assume that if reptiles are present, they are in very low numbers and their protection during development can be managed via habitat manipulation.

Birds

3.1.10 The bramble hedgerow on site provides ample nesting and foraging opportunity for birds.

Bats

3.1.11 The grassland field, and hedgerow provide moderate commuting and foraging opportunities for bats. In addition, the hedgerow creates a dark corridor that provides commuting habitat for bats. Static surveys were carried out on the site in July 2025, which found 5 bat species using the Malmesbury Primary School site. For full details please refer to the Bat Static Survey & Climbed Inspection Report (IES Consulting, 2025).

Badgers

3.1.12 No evidence of badgers was found on site.

3.1.13 A Habitat Baseline Plan can be seen in **Figure 4**.

3.2 Baseline Metric Calculations

Headline Calculation Results

3.2.1 The baseline date for this calculation was taken to be 27th January 2026. This is considered to be representative of the habitats on the site because the survey was undertaken at a suitable time of year to adequately assess the habitats present, which were predominantly modified grassland, hardstanding and individual trees.

3.2.2 **Plate 4** below provides the Headline Results from the Metric Tool.

Malmesbury Primary School

Headline Results

Scroll down for final results ↴

Return to results menu

On-site baseline	Area habitat units	0.29	
	Hedgerow units	0.25	
	Intercourse units	0.00	
On-site post-intervention (Including habitat retention, creation & enhancement)	Area habitat units	0.58	
	Hedgerow units	0.28	
	Intercourse units	0.00	
On-site net change (units & percentage)	Area habitat units	0.29	102.03%
	Hedgerow units	0.03	12.51%
	Intercourse units	0.00	0.00%
Off-site baseline	Area habitat units	0.00	
	Hedgerow units	0.00	
	Intercourse units	0.00	
Off-site post-intervention (Including habitat retention, creation & enhancement)	Area habitat units	0.00	
	Hedgerow units	0.00	
	Intercourse units	0.00	
Off-site net change (units & percentage)	Area habitat units	0.00	0.00%
	Hedgerow units	0.00	0.00%
	Intercourse units	0.00	0.00%
Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	0.29	
	Hedgerow units	0.03	
	Intercourse units	0.00	
Spatial risk multiplier (SRM) deductions	Area habitat units	0.00	
	Hedgerow units	0.00	
	Intercourse units	0.00	

FINAL RESULTS

Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	0.29
	Hedgerow units	0.03
	Intercourse units	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	102.03%
	Hedgerow units	12.51%
	Intercourse units	0.00%
Trading rules satisfied?	Yes ✓	

Unit Type	Target	Baseline Units	Units Provided	Unit Deficit
Area habitat units	10.00%	0.29	0.32	0.00
Hedgerow units	10.00%	0.25	0.28	0.00
Intercourse units	10.00%	0.00	0.00	0.00

No additional area habitat units required to meet target ✓

No additional hedgerow units required to meet target ✓

No additional intercourse units required to meet target ✓

Plate 4: Headline Results Summary

3.2.3 Habitat Units are the commodity that are assessed before and after the development. Habitat Units are derived from the types, area, distinctiveness and connectivity of off-natural habitat habitats on site.

3.2.4 The existing baseline has a total of 0.29 Habitat Units much of which is associated with the modified grassland on site, and 0.25 Hedgerow Units. Of the 0.58 Habitat Units in the current design, the majority are generated from the enhancement of modified grassland to other neutral grassland as well as the individual trees planted. Of the 0.28 Hedgerow Units, these are generated from the retention of the existing hedgerow as well as the creation of a native hedgerow.

3.2.5 Largely due to the provision of other neutral grassland, planted trees and hedgerow within the design, as well as the provision of scrub. The 0.29 Habitat Units and 0.03 Hedgerow Units the scheme can achieve will provide a habitat Biodiversity Net Gain

increase of 102.03% and a hedgerow Biodiversity Net Gain increase of 12.51% exceeding the target for the scheme of 10%.

3.2.6 In terms of Habitat Trading (see Full Metric Spreadsheet) on the whole, the scheme results in acceptable habitat trades. With the loss of low distinctiveness habitats being offset by high distinctiveness habitats.

4 BNG GOOD PRACTICE PRINCIPLES FOR DEVELOPMENT

4.1.1 The BNG Principles are:

Apply the mitigation hierarchy

- The scheme avoids impacts on habitats supporting protected species and retains the existing hedgerow. Where habitats are retained, they will be enhanced to higher value habitats, such as the conversion of modified grassland to other neutral grassland. These measures mitigate habitat loss resulting from development while providing functionally equivalent and improved habitat.

Avoid losing biodiversity that cannot be offset by gains elsewhere

- A minimum 10% biodiversity net gain target is achievable entirely within the site boundary, and the scheme delivers substantially above this, achieving 102.03% habitat net gain and 12.51% hedgerow net gain. As such, there is no reliance on off-site offsetting, and biodiversity losses are balanced by suitable on-site gains.

Be inclusive and equitable

- This project involves no additional external stakeholders.

Address risks

- The predicted condition assessments for the habitats have been conservatively assessed to maximise the chance of success.
- Where possible, habitat enhancement has been proposed rather than habitat creation, in order to maximise the chance of success.
- The delay in starting habitat creation time has been set to 1 year to account for the time to undertake the site strip and development.

Make a measurable Net Gain contribution

- The biodiversity metric demonstrates clear, measurable gains: 103.03% habitat net gain and 12.51% hedgerow net gain, well in excess of the 10% requirement.

Achieve the best outcomes for biodiversity

- Trading rules have been met to ensure that habitat losses are replaced with ecologically equivalent or higher value habitats. For example, low distinctiveness

modified grassland is being replaced with higher distinctiveness grassland. Delivery of gains on-site ensures that compensation is local, relevant to ecological networks and aligned with local biodiversity priorities.

Be additional

- The habitat creation and enhancement measures are entirely additional to baseline conditions. There are no pre-existing obligations on site that would have secured these outcomes without the proposed scheme.

Create a Net Gain legacy

- The HMMP will allow for perpetuity and planning for adaptive management. There are limited risks from other land uses which will affect the development area of the site. No harmful activities are being displaced. All management will take place on site.

Optimise sustainability

- BNG has been delivered through strategic design decisions, such as focusing development on areas of low distinctiveness habitat while enhancing and creating higher-value habitats such as neutral grassland. This ensures sustainability is embedded in the scheme by balancing ecological value with land use efficiency.

Be transparent

- This report provides a clear and detailed account of biodiversity net gain delivery, underpinned by the biodiversity metric and design rationale. The HMMP will continue to act as a transparent communication and monitoring tool, ensuring long-term accountability.

5 PROPOSED DESIGN

5.1 Proposed Design

5.1.1 Whilst there is a loss of low-quality modified grassland, it is offset by the provision of other neutral grassland, a newly planted native hedgerow and scrub. All of which will provide greater ecological value to the area.

5.1.2 The Proposed Habitat Plan can be seen in **Figure 5**.

5.2 Other Enhancements

5.2.1 The below biodiversity enhancements are proposed on the site:

- A sensitive lighting scheme to retain dark corridors at the perimeter of the site
- Spread wildflower lawn mix throughout the grassland to improve plant species diversity and suitable habitat for invertebrate species

6 BNG METRIC

6.1.1 The full spreadsheet can be seen in the attached excel file.

6.1.2 A one-year delay on starting habitat creation has been assumed across the site to accord with time to strip the site and complete the development.

7 CONCLUSIONS

7.1.1 The survey work and interpretation have shown the scheme will bring an Increase in Biodiversity Net Gain in line with local and national policy.

7.1.2 As well bringing forward a design that provides Biodiversity Net Gain, it is expected that the scheme will also provide ecologically valuable habitats such as the retention of the native hedgerow and the enhancement of the modified grassland to other neutral grassland that will provide a range of opportunities for wildlife.

7.1.3 On the strength of the assessment no further information is required.

7.1.4 The baseline conditions described in this report are true for the time at which the survey was undertaken. If no works are undertaken within the next two years, then an update survey may need to be undertaken to ensure the baseline conditions described are accurate.

IES Consulting Ltd 2026

8 REFERENCES

Guidance Documents - General

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HMSO The Hedgerow Regulations 1997

HMSO The Natural Environment and Rural Communities Act 2006

HMSO The Protection of Badger Act 1992

HMSO The Wildlife and Countryside Act 1981.

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FIGURE 1: SITE LOCATION



Figure 1: Site Location

 Red Line Boundary



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Project	Malmesbury Primary School Footpath		
Client	Daniel Connal Partnership		
Date	Mar 2026	Scale	See bar
Drawn	DBW	Job #	IES/2025/134

FIGURE 2: SURVEY AREA

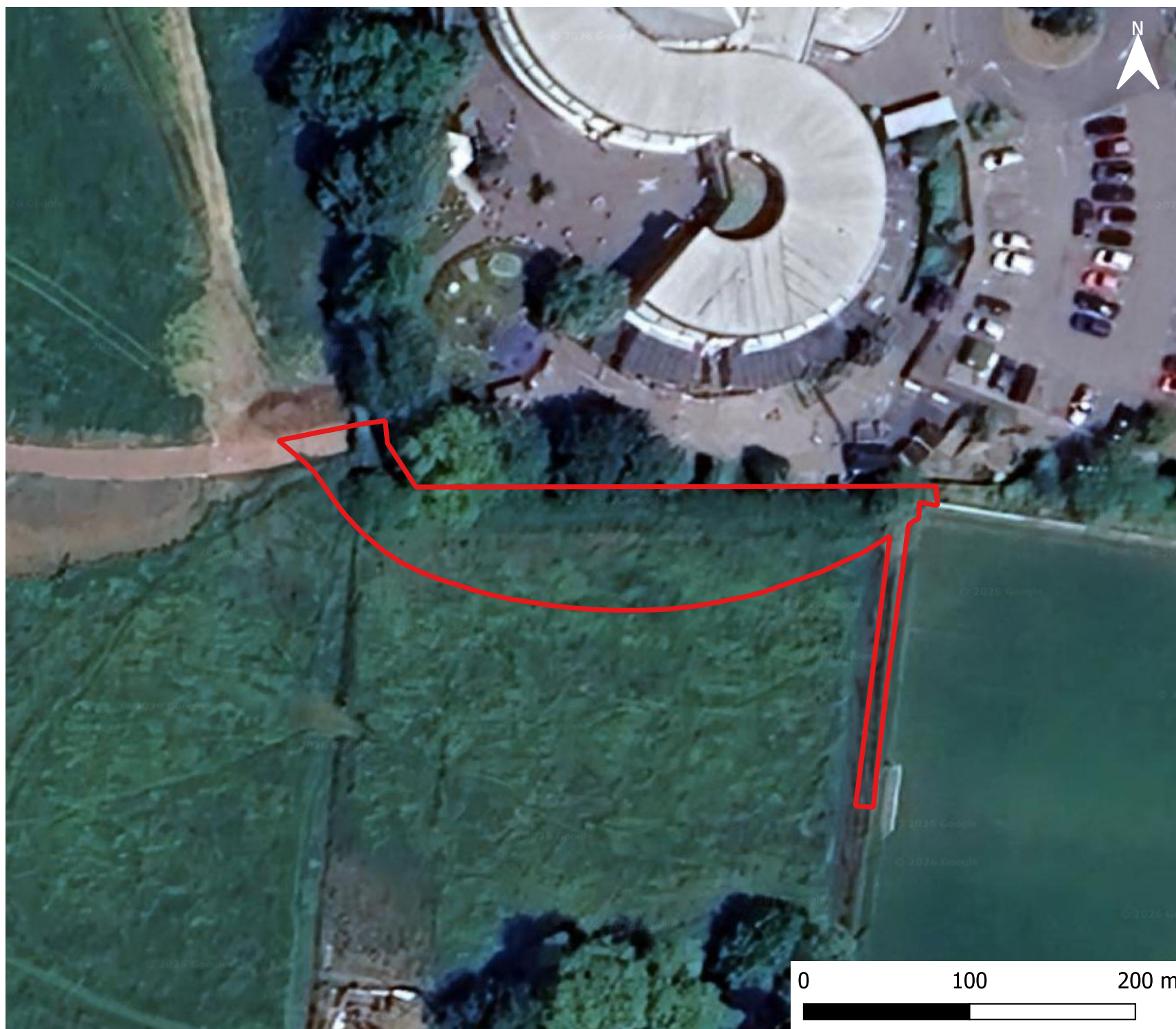


Figure 2: Survey Area

 Red Line Boundary

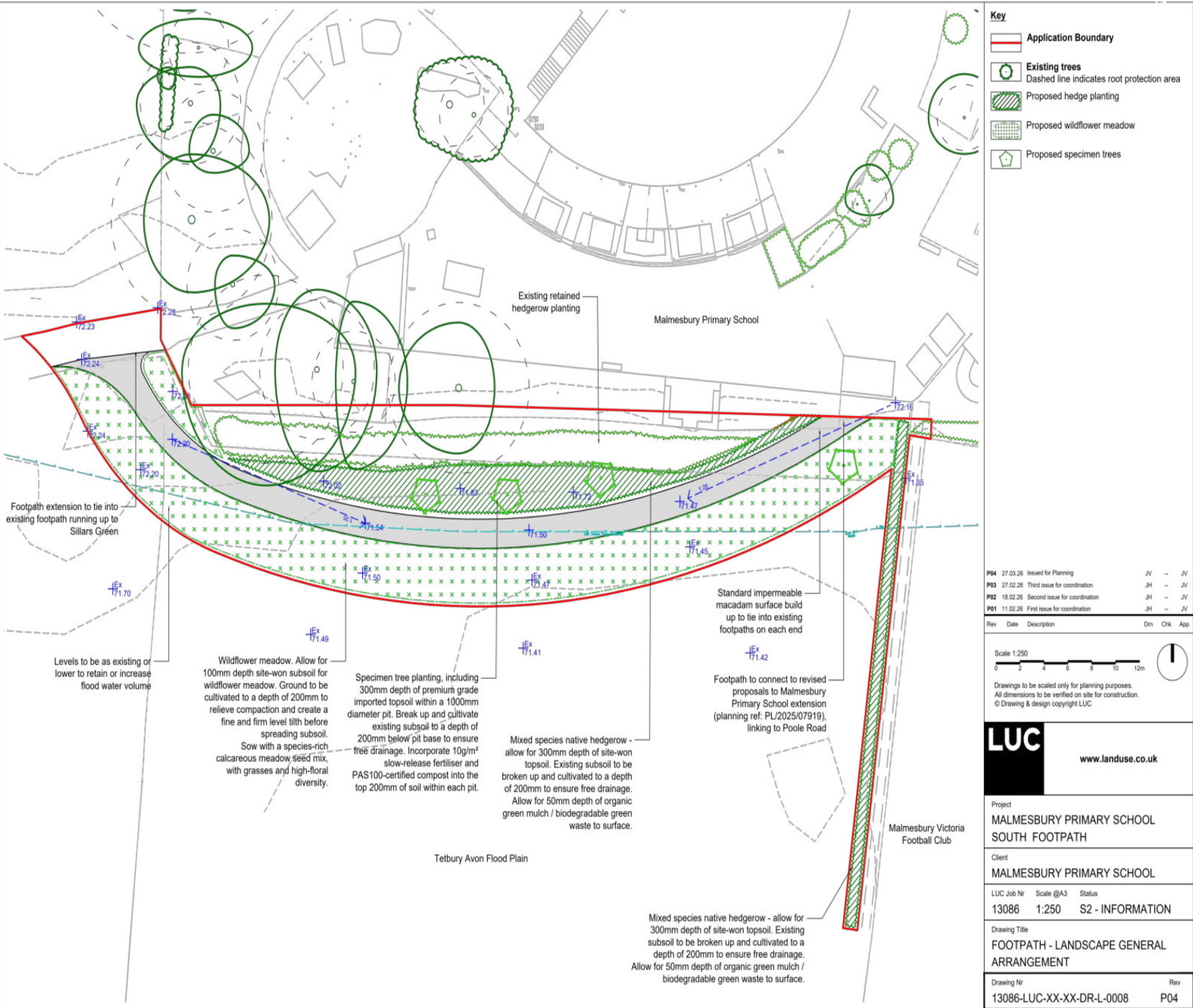


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FIGURE 3: LANDSCAPING PLAN

Figure 3: Landscaping Plan



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FIGURE 4: BASELINE HABITATS

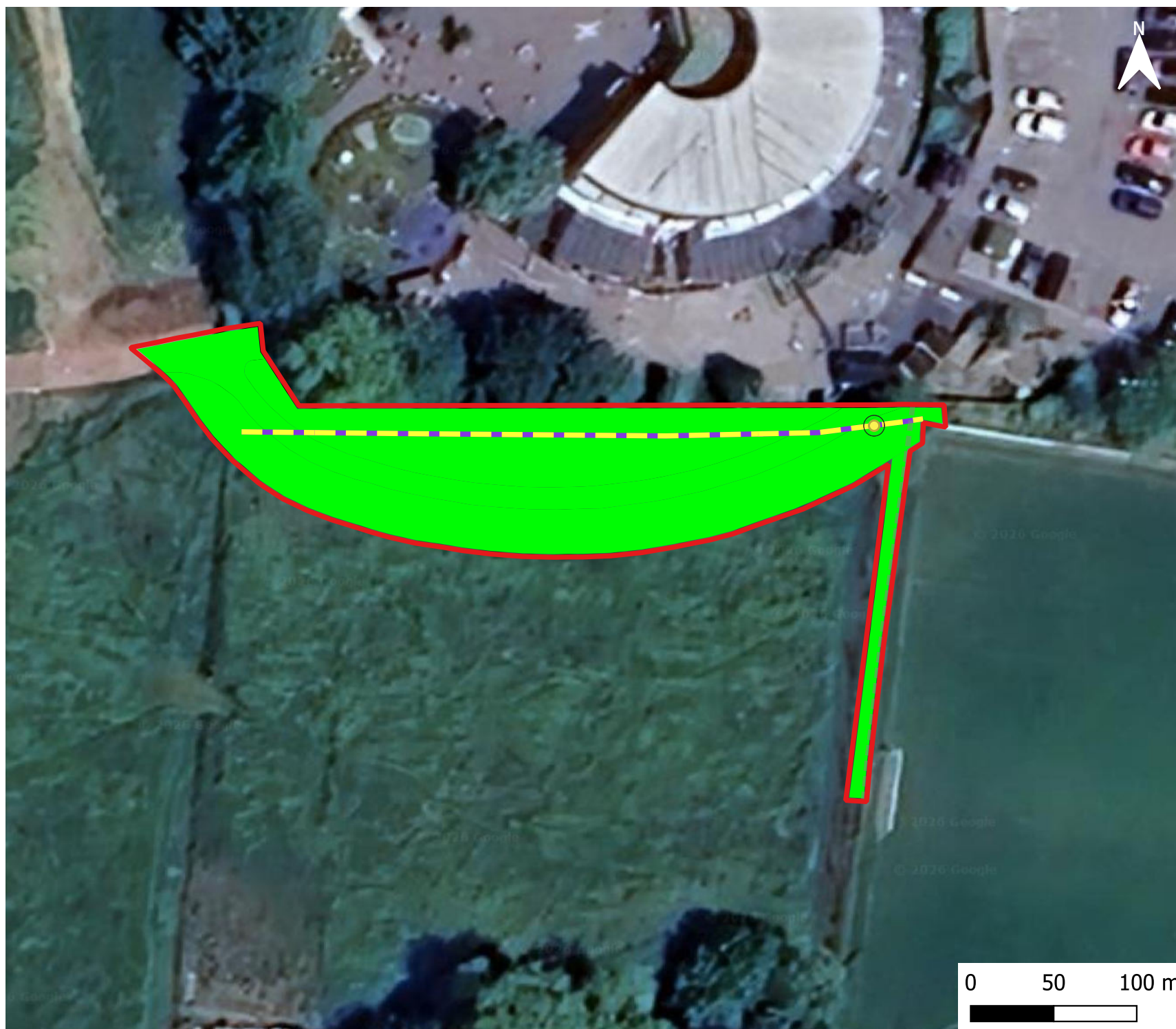


Figure 4: Baseline

- Red Line Boundary
- Native hedgerow
- Modified grassland
- Existing Medium Rural Tree


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FIGURE 5: PROPOSED HABITAT PLAN

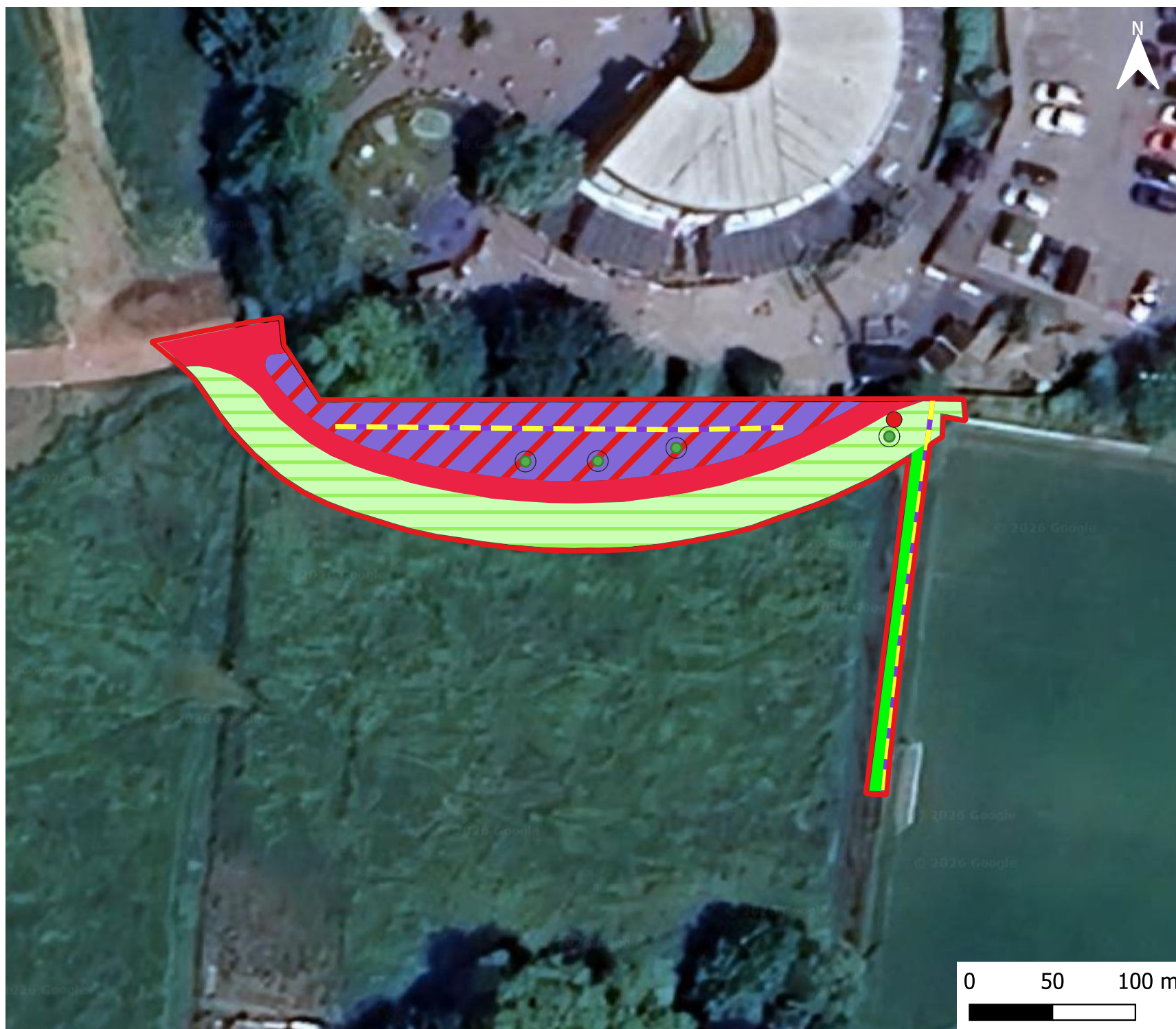


Figure 5: Proposed

- Red Line Boundary
- Lost Rural Tree
- Proposed Medium Rural Tree
- Native hedgerow
- Built linear features
- Mixed scrub
- Other neutral grassland


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APPENDIX A: POLICY AND LEGISLATION

POLICY

National Policy

National Planning Policy Framework (December 2023) - this document is a material consideration in planning decisions, and states that planning policies and decisions should provide net gains for biodiversity. The overarching environmental objective is to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy. Paragraph 170 d) states that planning decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Local Policy

The following policies are applicable to the site:

Core Policy 50

Biodiversity and Geodiversity

Protection

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

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

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

Biodiversity enhancement

All development should seek opportunities to enhance biodiversity. Major development in particular must include measures to deliver biodiversity gains through opportunities to restore, enhance and create valuable habitats, ecological networks and ecosystem services. Such enhancement measures will contribute to the objectives and targets of the

Biodiversity Action Plan (BAP) or River Basin/Catchment Management Plan, particularly through landscape scale projects, and be relevant to the local landscape character.

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.

Bat Special Areas of Conservation (SAC) Planning Guidance for Wiltshire

This document lays out the expectations with respect to bats relating to the SACs for this group in Wiltshire.

LEGISLATION

General

The Conservation of Habitats and Species Regulations 2017

This transposes the EU Habitats Directive into UK law, and provides protection for European Protected Species and European Protected Sites.

Species and groups which are covered under Schedule 2 (animals) and Schedule 5 (plants) of this legislation, and which are known as European Protected Species are:

- | | | |
|--|-------------------------------------|--|
| ▪ Bats (all species) | ▪ Sand lizard | ▪ Sturgeon |
| ▪ Large blue butterfly | ▪ Fisher's estuarine moth | ▪ Natterjack toad |
| ▪ Wild cat | ▪ Great crested newt | ▪ Marine turtles (green, hawksbill, Kemp's ridley, leatherback and loggerhead) |
| ▪ Dolphins, porpoises and whales (all species) | ▪ Common otter | ▪ Shore dock |
| ▪ Dormouse | ▪ Lesser whirlpool ram's-horn snail | ▪ Killarney fern |
| ▪ Pool frog | ▪ Smooth snake | |

- Early gentian
- Lady's slipper orchid
- Creeping marshwort
- Slender naiad
- Fen orchid
- Floating-leaved water
plantain
- Yellow marsh
saxifrage

You need a mitigation licence if your work will have impacts on European protected species that would otherwise be illegal, such as:

- capturing, killing, disturbing or injuring them (on purpose or by not taking enough care)
- damaging or destroying their breeding or resting places (even accidentally)
- obstructing access to their resting or sheltering places (on purpose or by not taking enough care)

Additionally, this legislation prevents public bodies from adopting plans or granting consents which could (possibly) damage Natura 2000 sites, which are either Special Protection Areas (SPAs) or Special Areas of Conservation (SACs), known as European Sites. In England this process also applies to Ramsar sites as a matter of policy. This means that there is a requirement for a Habitats Regulation Assessment (HRA), which has three stages:

- The Likely Significant Effect test (screening) - is the plan or project likely to have a significant effect on a European site alone or in combination with other plans/projects? If the answer is yes, you must move to Stage 2, Appropriate Assessment.
- Appropriate Assessment - can the competent authority be convinced there will be no adverse effect on the integrity of any site either alone or in combination with other plans/projects? If the answer is no, you must move to Stage 3, Derogation Tests.
- Derogation Tests - The plan/project must meet the three derogation tests in order to be allowed to proceed. 1. There are no feasible alternative solutions which are less damaging. 2. There are imperative reasons of overriding public interest (IROPI). 3. It is possible to put in place compensatory measures to ensure the overall coherence of the Natura 2000 network

The Natural Environment and Rural Communities Act 2006

This act established Natural England, and extended the duties of public bodies in relation to biodiversity by amending the CROW Act 2000 and the Wildlife and Countryside Act 1981. It established the Section 41 species and habitats of principal importance for the purpose of conserving biodiversity, which need to be taken into account by a public body when performing any of its functions. There are currently 56 habitats of principle importance and 943 species of principle importance, which are summarised below.

Category	Group	Number
	Amphibians/Reptiles	10

Category	Group	Number
Terrestrial/Freshwater/Coastal Species	Birds	49
	Fish	14
	Mammals	17
	Invertebrates	379
	Lower plants and fungi	250
	Vascular plants	152
	Total	865
Terrestrial/Freshwater/Coastal Habitats	Arable and horticulture	2
	Boundary	1
	Coastal	6
	Freshwater	6
	Grassland	6
	Heathland	3
	Inland rock	4
	Wetland	6
	Woodland	6
	Total	40
Marine Species	Marine mammals	17
	Marine reptiles	2
	Marine fish	34
	Marine invertebrates	19
	Marine algae	6
	Total	78
Marine Habitats	Marine habitats	16

Category	Group	Number
	Total	16

The Countryside and Rights of Way Act 2000

This act places a duty on Government departments and the National Assembly for Wales to have regard for the conservation of biodiversity, and to maintain lists of species and habitats for which conservation steps should be taken or promoted (those these lists have been superseded by the S41 lists of the NERC Act 2006), in accordance with the Convention on Biological Diversity. It amends the SSSI provisions of the Wildlife and Countryside Act 1981 by providing increased power for their protection and management. It strengthens the legal protection for species named on the Wildlife and Countryside Act 1981, including changing the maximum penalty to a term of imprisonment rather than a fine, and creates a new offence of reckless disturbance. This means that if a person takes an unacceptable risk, or fails to notice an obvious risk, they will be liable.

The Hedgerow Regulations 1997

This provides protection for hedgerows classified as 'important' under the regulations. It requires an application in writing to the local planning authority before a hedgerow is removed, though there are exceptions for creating new access points, and for certain hedgerows such as those bordering dwelling houses. The local planning authority can then either issue a hedgerow retention notice, or written notice giving permission to remove it. If permission to remove is given, this must be enacted within two years of the date of the notice, or a new application will need to be made. There are specific criteria for length, location and 'importance' which must be met for a hedgerow to be protected. If the local planning authority does not respond within the statutory 42 days, then the hedgerow can be removed.

The Protection of Badgers Act 1992

This provides legal protection to badgers and their setts, making it an offence to kill, injure or take a badger, or to damage or interfere with a sett unless you have a licence. In practice, this means that any works within 30m of a badger sett may require a licence, depending on the type of works and methodology proposed.

The Wildlife and Countryside Act 1981

This act provides legal protection for wild birds, Sites of Special Scientific Interest, plants, reptiles and other amphibians and other animals, and makes it a criminal offence to kill, injure or take those species listed in the act, and to damage, obstruct or destroy their resting places, or disturb them in their resting places.

APPENDIX B: CONDITION SHEETS

[illegible]

Passes 3 or 4 criteria	Moderate (2)	Yes											
Passes 2 or fewer criteria	Poor (1)												
Note that 'Fairly Good and Fairly Poor' condition categories are not available for this broad habitat type.													
Suggested enhancement interventions to improve condition score ²													