



Land at White Street, West Lavington, Wiltshire -
Proposed residential development

Ecological Impact Assessment (EcIA)

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FINAL (rev01)

Prepared for:



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1.0 INTRODUCTION

1.1 Location and setting

A planning application has been submitted for a proposed development of 47 dwellings and associated works, on a site of approximately 2.13 ha on the south-western edge of the Wiltshire village of West Lavington (central OS grid reference SU 00408 53270 / what three words reference ///reference.impresses.cooking).

The site comprises a species-poor grass and tall herb-dominated field; a species-poor blackthorn *Prunus spinosa*-dominated hedge and scrub fringes the western edge of the field, and a wooded belt of sycamore *Acer pseudoplatanus* and beech *Fagus sylvatica* abuts the southern margin. A fenced footpath runs along the eastern boundary, whilst domestic properties border the Site at its northern end. There are no buildings within the red line.

1.2 Terms of Reference

Andrew McCarthy Ecology Limited was instructed by CG Fry & Son Limited to prepare an Ecological Impact Assessment (EcIA) in support of the proposed development. An ecological study has therefore been undertaken to support the assessment, which has comprised:

- (i) Scrutiny of desk study data for up to 2km from the site for all fauna species other than bats (for which a 4km distance was adopted).
- (ii) Survey and mapping of habitats in line with UK Habitats Classification survey techniques.
- (iii) Habitat Condition Assessment to establish the condition of the main habitat features, and assignment of each type to the Biodiversity Net Gain (BNG) equivalent in advance of preparation of the Statutory Metric.
- (iv) Assessment of the sites' potential to support legally protected / conservation priority fauna and to conduct follow-up fauna surveys in line with best practice.
- (v) Pre-app consultation with the Wiltshire Council Ecology team to determine the adequacy of the survey and the scope of the assessment.

Figure 1. The Site in its landscape context



Figure 2. Proposed development layout



1.3 Purpose of this report

This impact assessment has been prepared to: -

- Identify/describe potentially significant ecological effects associated with a proposed development at this location.
- Set out measures to mitigate any negative effects, to enable compliance with nature conservation legislation/policy and best practice.
- Assess the significance of any residual effects that remain after mitigation.
- Identify and quantify any compensation and/or enhancement measures that may be required, including those in line with statutory requirements for Biodiversity Net Gain.
- Set out requirements for any post-construction monitoring that might be needed.
- Identify how mitigation and enhancement measures can be secured.

1.4 Staff experience

Project management, habitat survey, review of desk study data and impact assessment reporting have been undertaken by Andrew McCarthy CIEEM CEnv, who has over 30 years' experience as an ecological consultant and holds licenses to survey bats (Class II: 2015-12464-CLS-CLS), dormouse *Muscardinus avellanarius* (2016-21743-CLS-CLS), great crested-newt *Triturus cristatus* (2015-18263-CLS-CLS) and barn owl *Tyto alba* (CL29/00140). The main tranche of work in 2024-2025 was conducted or overseen by the following: Alistair Campbell BSc (Hon) MSc MCIEEM undertook bat transect survey; dormouse and reptile surveys were carried out by experienced ecologists under the supervision of Greg Nightingale BSc (Hon) MCIEEM; breeding bird survey was carried out by Simon Breeze MCIEEM, an experienced local ornithologist; GIS mapping has been undertaken by Jonathan Webb BSc (Hons) MSc and static bat detector and 'Ecobat' analysis was undertaken by Andy Swam BSc (Hons) MSc MCIEEM.

1.5 Regulatory context

1.5.1 **Planning and Infrastructure Act 2025**

The *Planning and Infrastructure Act 2025*, passed on December 18, 2025, introduces significant changes to the planning system in respect of biodiversity. Among the key provisions in The Act are measures to streamline decision-making and tackle perceived environmental challenges to the speedy delivery of planning consents; this will, in due course, be achieved through the imposition of a nature restoration levy on developments. It is intended that the levy (the exact delivery mechanism for which has not yet been confirmed) will fund environmental delivery plans to address environmental constraints arising from new developments. These and other changes will eventually affect how ecological assessments are conducted and how ecology is integrated into development proposals, with a likely emphasis on clearer, more standardised mitigation strategies for environmental impacts.

1.5.2 **Post-Brexit changes**

The European Union (Withdrawal Agreement) Act, which received royal assent on 23 January 2020, provided for a transition period until 31 December 2020, during which all existing EU directives (and therefore UK Regulations pertaining to them) remained in place. This deadline has now passed, and in January 2021 Defra published a new policy document explaining the changes to the Conservation

of Habitats and Species Regulations 2017, as amended (also referred to as the Habitats Regulations). The following is extracted from a January 2021 summary of the Defra guidance (by CIEEM):

“The 2017 Regulations are one of the pieces of domestic law that transposed the land and marine aspects of the Habitats Directive (Council Directive 92/43/EEC) and certain elements of the Wild Birds Directive (Directive 2009/147/EC) (known as the Nature Directives). The main points and processes of the new 2019 Regulations is to make them operable from 1 January 2021. The changes cover England and Wales, including their inshore waters up to 12 nautical miles, and explain how the amendments to the legislation work; it does not cover offshore waters beyond 12nm, but similar processes are expected to be applied.

What has changed?

The Secretary of State for the Environment, Food and Rural Affairs and the Welsh Ministers have made changes to parts of the 2017 Regulations to ensure they operate effectively. Most of these changes involved transferring functions from the European Commission to the appropriate authorities in England and Wales. All other processes or terms in the 2017 Regulations remain unchanged, and existing guidance is still relevant. The obligations of a competent authority in the 2017 Regulations for the protection of sites or species do not change. A competent authority is a public body, statutory undertaker, minister or department of government, or anyone holding public office.

The main changes to the 2017 Regulations are:

- The creation of a national site network within the UK territory comprising the protected sites already designated under the Nature Directives, and any further sites designated under these Regulations.*
- The establishment of management objectives for the national site network (the ‘network objectives’).*
- A duty for appropriate authorities to manage and, where necessary, adapt the national site network to achieve the network objectives.*
- An amended process for the designation of Special Areas of Conservation (SACs).*
- Arrangements for reporting on the implementation of the Regulations, given that the UK no longer provides reports to the European Commission.*
- Arrangements replacing the European Commission’s functions regarding the imperative reasons of overriding public interest (IROPI) test, where a plan or project affects a priority habitat or species.*
- Arrangements for amending the schedules to the Regulations and the annexes to the Nature Directives that apply to the UK.*

The 2017 Regulations (Regulation 9(1)), as amended by the 2019 Regulations, require the Secretary of State and Welsh Ministers to secure compliance with the requirements of the Nature Directives. Any new powers in the 2019 Regulations must be exercised in line with the Directives and retained EU case law up to 1 January 2021.”

In September 2022, the Retained EU Law (Revocation and Reform) Bill (Bill 156) was presented to the House of Commons for its first reading. The Bill would, in due course, overhaul UK domestic law

known as “retained EU law”, which was created by the EU (Withdrawal) Act 2018, as amended by the EU (Withdrawal Agreement) Act 2020, and came into existence at the end of the post-Brexit transition period (i.e. the end of 2020). It is unclear at this stage which biodiversity legislation will replace it. For the moment, the UK retained Habitats Regulations continue to make it an offence to deliberately capture, kill or disturb wild animals listed under Schedule 2 of the Regulations. Disturbance of such species includes any action that would impair the ability of such animals to survive, breed, rear their young, hibernate or migrate (where relevant) or which would affect the local distribution or abundance of such a species. It remains an offence to damage or destroy a breeding site or resting place of such an animal (for example, a bat roost) even if it is not present at the time.

1.5.3 **Wildlife and Countryside Act**

The Wildlife and Countryside Act 1981, as amended by the Countryside and Rights of Way Act (CROW Act) 2000 and the Natural Environment and Rural Communities Act (NERC) 2006 consolidates and amends existing 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). Under this legislation, it would be an offence to:

Intentionally kill, injure or take any wild bird or their eggs or nests (with certain exceptions) or disturb any bird species listed under Schedule 1 (e.g., barn owl) or their dependent young while nesting. Since there are unlikely to be any Schedule 1 species nesting on site, the net effect of the legislation is to protect the nests and eggs of all other bird species from damage during the breeding season (generally taken to be March-August inclusive).

Intentionally kill, injure, or take any wild animal listed under Schedule 5, intentionally or recklessly damage, destroy or obstruct any place used for shelter or protection by any wild animal listed in Schedule 5 and / or intentionally or recklessly disturb certain Schedule 5 animal species while they are occupying a place used for shelter or protection.

1.5.4 **The Protection of Badgers Act**

Badgers and their setts are legally protected under the Protection of Badgers Act 1992, which replaced and consolidated the Badgers Act 1973, the Badgers Act 1991, and the Badgers Act (Further Protection) Act 1991. The legislation makes it an offence to intentionally kill or injure a badger, or to disturb, damage or destroy a sett. The legislation primarily aims to protect animal welfare.

1.5.5 **Hedgerow Regulations 1997**

The Hedgerow Regulations 1997 protect hedgerows in the countryside. A hedgerow is assessed as ‘important’ if it has (i) been present for more than 30 years and (ii) complies with the appropriate criteria listed in Part II of Schedule 1 of the Regulations. Whilst it would be unlawful to remove or destroy an ‘important’ hedgerow without first obtaining permission from the local authority. Removal may be possible under certain circumstances, including when development is being carried out for which planning permission has been granted.

1.5.6 **Biodiversity Net Gain**

Biodiversity Net Gain (BNG) is “an approach to development that leaves biodiversity in a better state than before” (CIEEM, 2018). It builds on the mitigation hierarchy of avoid, mitigate, and if this is not possible, compensate, by securing measurable enhancement at the end of a project, rather than a neutral outcome (as was the case when following the earlier requirement for no net loss). The Environment Act 2021 sets out the following key components for mandatory biodiversity gain:

- Amends the Town & Country Planning Act
- A minimum 10% gain is required to be calculated using the Statutory Biodiversity Metric and approval of a Biodiversity Gain Plan
- On and off-site habitat creation and enhancements that contribute to net gain must be secured for at least 30 years via planning conditions, obligations, or covenants (at present via S106)

Gains and losses have been calculated for this proposed scheme using the Statutory Metric spreadsheet (hereafter referred to as 'the Metric'), which has been submitted as part of the planning application document pack, in line with statutory requirements, separately to the EclA.

1.6 Policy context

1.6.1 *The National Planning Policy Framework (NPPF)*

The National Planning Policy Framework (NPPF) (consultations for revision of which are currently taking place) sets out the government's planning policies for England and how these are expected to be applied in a local context. Chapter 11 of the NPPF outlines how the UK planning system can contribute to, create, enhance, and protect the environment by minimising impacts on biodiversity and, where possible, by driving the delivery of 'Net Biodiversity Gain' (sic). Important local wildlife sites are recognised in the NPPF through local designations, and the NPPF provides direction to local authorities to identify, map, and protect such sites in local plans. It recognises that Local Wildlife Sites make a significant contribution to wider ecological networks.

1.6.2 *NERC Section 41 Species*

The 'NERC' Act came into force on 1st Oct 2006. NERC Section 41 (S41) requires the Secretary of State to publish a list of habitats and species of 'Principal Importance' for the conservation of biodiversity in England. This guides decision-makers such as public bodies, including local and regional authorities such as the Devon Minerals Planning Authority, in implementing their duty under section 40 of the NERC Act where they are required to 'have regard to the conservation of biodiversity in England, when carrying out their normal functions'. Fifty-six habitats and 943 species are included on the Section 41 list¹. These are habitats and species identified as requiring action in the UK Biodiversity Action Plan (UK BAP) and that remain conservation priorities in the Post-BAP Biodiversity Framework.

1.6.3 *Local biodiversity policy*

Wiltshire Core Strategy (Adopted 2025)

The Wiltshire Core Strategy sets the overall framework for development in Wiltshire and includes land-use, infrastructure, and environmental policies. The plan includes specific policies addressing sustainable development, conservation and biodiversity. Relevant Policies from Wiltshire Core Strategy are as follows:

Core Policy 50: Biodiversity and Geodiversity

This policy aims to protect and enhance biodiversity and geodiversity within Wiltshire. Development proposals must demonstrate that they avoid harm to biodiversity, particularly priority habitats and

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<http://webarchive.nationalarchives.gov.uk/20140605090108/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

species, and nationally and internationally designated sites. The policy encourages the creation of green infrastructure, such as wildlife corridors, to prevent habitat fragmentation from development. Ecological assessments, including surveys of protected species, are currently required for certain developments that might impact sensitive areas.

Core policy 52: Green infrastructure

Green infrastructure is a network of natural and semi-natural features within and around settlements, such as parks, wildlife corridors, woodlands, and wetlands. For development in or near rural areas (like West Lavington), proposals should: retain or enhance green infrastructure networks; minimise fragmentation of existing wildlife habitats and provide new or enhanced wildlife corridors as part of the development.

Core Policy 57: Ensuring High Quality Design and Place Shaping

This policy stresses the importance of design that respects the local landscape and ecology. It encourages integrating ecological principles into the layout and landscape design of new developments. Development should protect local biodiversity and mitigate any potential adverse effects on wildlife and natural habitats.

2.0 BASELINE SURVEY METHODOLOGY

2.1 Desk study

A desk-based data search was undertaken in 2024 through the Wiltshire & Swindon Biological Records Centre (WSBRC) for protected/priority species records and non-statutory wildlife site locations within 2km (4km for bats), and the results were delivered in search report reference 20240815_1_AME.

The publicly accessible website www.magic.gov.uk was also used to check the extent of consultation zones associated with statutory protected sites in Wiltshire and to ascertain whether the site lies within any areas (or risk zones for) sites of strategic importance for nature conservation.

2.2 Habitat survey

A baseline habitat survey was undertaken on 21 July 2024 using the UK Habitats Classification methodology (which is becoming the standard for habitat surveys in the UK since it underpins Biodiversity Net Gain). UK Habitats Classification documents are available at the following location: <http://ecountability.co.uk/ukhabworkinggroup-ukhab>.

A BNG Habitats Condition Assessment (HCA) was conducted for all habitats potentially affected by the proposed development during the same visit. The approach in the field was to record plant species and their percentage ground cover within 17 2m x 2m quadrats, with each quadrat identified using a What3Words location. Quadrats were positioned to sample structural and floristic diversity across the field. Data was entered into an Excel spreadsheet to accompany the metric.

Characteristic botanical species are listed in the report text below for each of the main mapped habitat types, rather than in a separate appended species list, because the plant communities are simple and species-poor.

2.2.1 *Survey limitations*

The UK Habitats Classification survey, Habitat Condition Assessment data collection, and appraisal for potential protected / priority species were undertaken at an appropriate time of year by Andrew McCarthy BSc Hons CIEEM CEnv, who is a suitably experienced ecologist.

A robust preliminary appraisal was possible - plant species were identified to species level in most cases, and the surveyor was confident that habitats were correctly assessed and sufficiently accurately mapped. No priority plant species or other noteworthy ecological features are likely to have been missed during the survey, so this would not have made a material difference to the conclusions and recommendations set out in this report.

Professional judgement (supported by consultation with experienced colleagues as appropriate) was applied when allocating grassland plant communities to a UK Habs / BNG type (there is currently a lack of clarity in the UK Habs methodology where swards fall between g4 Modified Grassland and poorer Other Neutral Grassland types).

An initial assessment of the sites' potential to support legally protected and conservation-priority species was conducted during the habitat survey and refined upon receipt of the desk study. Local presence and the habitats' on-site capacity to support key faunal species were considered. The following taxa were considered at the initial assessment stage:

Table 2.1 Initial field-based assessment for protected / conservation priority species that might require further survey

Species	Notes
Bats	Air photographs and OS maps were scrutinised at the outset of the project to assess the site in a landscape context, with respect to its potential for foraging and commuting bats. Whilst there are no buildings on the site, there is a wooded belt along the southern margin, as well as a species-poor, intact hedge and scrub along the western edge. A bat survey using transects and static detectors was therefore conducted during 2024-2025.
Badger	Check surveys for evidence of badgers were undertaken initially during the UK Habitats Classification survey and again in winter 2025. The wider field and site margins were inspected for field evidence of this species during these surveys, in particular for evidence of sett excavation.
Birds	Habitats (grassland, hedges, and wooded belts in the south) were assessed for their potential to support bird foraging and for features with potential for nesting, particularly for priority taxa.
Dormouse	Hedges and a tree line on the southern boundary were assessed as having some potential to support this arboreal mammal; whilst it has not been recorded within 2km, it is present locally in Wiltshire and therefore a survey was undertaken during 2024-25.
Harvest mouse	Grassland and scrub can provide breeding habitat for this nationally declining species, which is known to be present within 2km; therefore, a survey for it was undertaken in October 2024.
Hedgehog	Grassland can provide high-quality habitat for foraging by this species, which is known to be present locally, and presence has been assumed for the purposes of impact assessment.
Reptiles & amphibians	Coarse grassland can provide suitable habitat for widespread reptile species; therefore, a survey was conducted in 2025, using artificial heat refuges during seven check visits following deployment. A review of air photos and OS maps indicated that there may be two extant ponds present within 500m: one in a garden to the south, and one associated with a local stream and wet woodland to the east. Neither of these is visible from public footpaths/roads, and it was not possible (at the time of writing) to secure access to them for physical inspection or survey [the desk study returned no records of the species locally; however, it is recognised that this may simply be due to an absence of survey effort].
Invertebrates	Coarse grassland, including patches of tall competitive herb species, woodland dominated by sycamore and beech, and species-poor hedges, can provide suitable habitat for a range of invertebrates. However, as habitats within and adjacent to the site are of low floristic interest, the invertebrate assemblage

Species	Notes
	was considered likely to reflect this and therefore no specific entomological surveys were undertaken as part of the survey baseline.

2.3 Fauna survey

2.3.1 *Badger*

Methodology

A survey for signs of badger activity (particularly for excavations associated with sett construction) was undertaken during the habitat survey in 2024 and again after vegetation had died back in late November 2025, by Andrew McCarthy, MCIEEM.

Limitations

There were no limitations on completing a robust badger survey.

2.3.2 *Dormouse*

Methodology

This arboreal mammal was not recorded during the desk study; however, as it occurs in Wiltshire, a baseline survey of the hedge in the west and the wooded southern edge was conducted. Fieldwork commenced in August 2024 and comprised the deployment of 50 artificial nest tubes in line with published best practice. These were positioned 5m apart along the full extent of the hedge/scrub belt on the western edge and along the full length of the wooded southern boundary. Tubes were checked bi-monthly following deployment on the 10th of August 2024, until retrieval on the 22nd of August 2025. During each check visit, tubes were checked for of individual dormice or for indirect evidence of their presence - e.g. characteristic woven nests. Survey results were recorded in a field log.

Limitations

There were no limitations on completing a robust dormouse survey.

2.3.3 *Harvest mouse*

Methodology

A check survey of the (uncut) edge grassland habitat was undertaken in October 2024 by Andrew McCarthy, MCIEEM, for this declining conservation priority species, using the Mammal Society search method for indicating species presence. During the survey, grass tussocks were systematically parted to search for nests, and long grass and scrub-edge habitats were systematically checked. A detailed survey methodology is set out in the following document: the National Harvest Mouse Survey Protocol, Version 2.2, 2022-11-24.

Limitations

There were no limitations on completing a robust harvest mouse survey.

2.3.4 **Western European hedgehog**

Methodology

Grasslands (cut and uncut) can provide foraging habitat for this declining species, which is known to occur within 2km. No specific surveys were conducted for this species, as there is no agreed-upon national survey protocol for it; nevertheless, a worst-case assumption (i.e., that the species is likely to be present) was used in the impact assessment.

2.3.5 **Bats**

In line with current best practice, the appropriate level of survey for a site of this type and size was three dusk activity surveys, together with deployment of an appropriate number of static detectors².

Activity survey

Each transect/walkover session was approximately 1.5 to 2 hours long. All three sessions were undertaken during acceptable weather (i.e., mainly dry with light winds and temperatures above 10°C). Transects were conducted using full-spectrum ultrasound bat detectors, in line with current best practice. The entire site was sampled via a walkover, with edges and the open central areas walked to detect bats, using grassland/hedges and the woodland belt in the south.

All three surveys were conducted using an Elekon BatLogger3F³ detectors.

Survey dates were as follows:

- 11th August 2025
- 25th September 2025
- 08th October 2025

Temperature, wind speed/direction, cloud cover and precipitation were recorded by the surveyor at the beginning and end of each activity/transect session, along with any significant changes in conditions that were noted during the session (for example, a sharp drop in temperature, an increase in wind speed or onset of persistent rain).

Static survey

A remote (static) detector survey was also conducted. This commenced in August 2024 and ran to October 2024; it recommenced in April 2025 and continued to July 2025. Three static units were deployed at the positions shown in Figure 3 to sample the western hedge, the southern wooded belt, and the open field.

² A combination of walked activity surveys together with static data loggers is normally used on bat surveys in line with the best practice active at the time of writing (Collins et al., 2023). Two detectors would normally be appropriate for a site of this small size.

³ The Bat Logger uses a highly sensitive omnidirectional microphone, which is effective at detecting the high frequencies emitted by horseshoe bats. It contains a GPS logger, which automatically logs bat passes; thus, there is no need to stop and make sample counts³. As a result, a transect on a site of this size can be repeated several times, with the surveyor pausing only to observe bat behaviour and take notes as required.

Figure 3. Static detector locations 2024-25



Ground-based tree assessment

In addition to the above, an assessment of trees that would potentially be lost to the development in the south-eastern corner was undertaken by Andrew McCarthy, MCIEEM (a Class II bat licence holder for over 20 years), following leaf fall in November 2025, to ascertain the potential of trees at this point to support roosting bats. This visual inspection was conducted from the ground using binoculars to identify Potential Roost Features (PRFs), such as holes, splits, and other fissures.

Limitations – transect bat survey

It was not possible to access the site for nighttime surveys during spring 2025, so the first transect/walkover was conducted during August. In the opinion of the consultant, a single additional transect/walkover during spring 2026 would be highly unlikely to provide additional data that would significantly affect the conclusions of the impact assessment as it currently stands (in part since the bulk of the bat data for the purpose of an impact assessment now comes from static survey, with transect/walkover being supplementary).

Limitations – static bat survey

There were no limitations on completing a static baseline survey, except for the failure of a static unit deployed in April 2025 at Location 2. This resulted in a technical fault, and no data were recorded for this session. The loss of one session at Location 2, due solely to equipment failure, is considered minimal. This was tested during the analysis by replacing the missing month in the dataset with means derived from the six sampled months; under this scenario, Location 1 still showed the highest activity and Location 2 the second highest.

Limitations – ground-based tree (bat) survey

There were no limitations on completing a tree check survey, except for the presence of ivy on some young trees/saplings at the southeastern access point. Work was completed following leaf fall in November 2025, on a bright, clear day when tree canopies were clearly visible from the ground.

2.3.6 Birds

An examination of data search returns for a 2km radius indicated that this site could be of potential value for priority farmland birds, as well as for locally common and widespread species associated with the urban-rural fringe; therefore, a breeding survey was conducted by an experienced ornithologist in spring 2025.

Breeding Bird Survey (BBS) methodology followed the standard approach⁴ and consisted of six sessions between the 2nd of April and the 3rd of July 2025. During the survey, an experienced surveyor walked the site, recording all birds seen or heard and noting behaviour that might indicate breeding. Bird records were entered on a suitably scaled field map using standard British Trust for Ornithology (BTO) species codes and behavioural notations (e.g., singing, carrying food).

Classification of bird status was based on the following:

Non-breeding

- Flying over.
- Species observed but suspected to be still on migration.
- Species observed but suspected to be summering non-breeding species.

Possible breeding

- Species observed in breeding season in suitable nesting habitat.
- Singing male present (or breeding calls heard) in breeding season in suitable breeding habitat.

Probable breeding

- Pair observed in a suitable nesting habitat during the breeding season.
- Permanent territory presumed through registration of territorial behaviour (song, etc.) on at least two different days a week or more at the same place, or numerous individuals on a single day.
- Courtship and display noted (judged to be in or near potential breeding habitat).
- Visiting probable nest site.
- Agitated behaviour or anxiety calls from adults, suggesting probable presence of nest or young nearby.
- Brood patch on an adult examined in the hand (suggesting Incubation).
- Nest Building or excavating nest-hole

Confirmed breeding

- Distraction-display or injury feigning.
- Used nest or eggshells found (occupied or laid during period of survey);
- Recently fledged young or downy young; consideration given to the provenance of any fledged juvenile capable of significant geographical movement.
- Adults entering/leaving nest-site in circumstances indicating occupied nest (including high nests or nest holes, the contents of which cannot be seen) or adults observed incubating.
- Adult carrying faecal sac or food for young.
- Nest confirmed with eggs.
- Nest confirmed with young.

⁴ <https://birdsurveyguidelines.org/>

Survey limitations

There were no limitations on completing a robust breeding bird survey.

2.3.7 Reptiles

Methodology

A reptile survey commenced in spring 2024, in line with the Froglife Advice Sheet 9 approach for presence/absence. A total of 30 bitumen roofing felt sheets were laid along the margins of the field, around all edges, and through the centre. Felts were left for two weeks to allow reptiles to locate and use them prior to the first of seven check sessions conducted between the 27th of August and the 10th of October 2024 by suitably experienced field ecologists under the supervision of Greg Nightingale, MCIEEM. In addition to physically checking under refuges, active observational work was carried out during each check; this involved visually searching (using binoculars) for reptiles, such as lizards basking on refuge surfaces.

Survey limitations

There were no limitations on completing a robust reptile presence/absence survey.

Note, however, that there is not a currently accepted (i.e. robust, research-based) method of quantifying reptile population size. The Froglife document referred to above is now over 26 years old and has not been revised with a new methodology since 1999; it suggests 20 visits may be needed to establish population size, but to this consultants knowledge, such a high level of survey would not normally be justifiable on proposed development sites, since the (considerable) additional effort and expense is highly unlikely to yield sufficient additional information which might change the approach to mitigation. Rather, it is usual for the advising ecologist to use their professional judgement when setting out appropriate/proportionate mitigation measures, in consultation with the local authority ecology team.

Figure 4. Location of reptile refuges



2.3.8 Amphibians

Methodology

Two water bodies (neither of which was physically accessible at the time of writing) were noted on the 1:25,000-scale OS map within 500m; these are shown in Figure 5 below.

Feature 1 is approximately 60m to the SSE in a garden south of the site and appears to be at least periodically dry, based on Google Earth imagery.

The second feature (2 below) appears to be hydrologically linked to the adjacent Semmington Brook; it lies around 150m ESE.

Figure 5. Location of ponds/waterbodies within 500m of the site



Survey limitations

Neither of the waterbodies was accessible/viewable to surveyors from nearby footpaths or roads at the time of writing⁵, so no physical inspection or amphibian survey had been undertaken at the time of writing.

2.3.9 Invertebrates

The site was assessed as likely to have moderate invertebrate interest, given the dominance of flower-poor grassland. Invertebrate assemblages tend to be richest in structurally diverse, sunny, flower-rich habitats, where sheltered corners and warmer microclimates predominate.

Nonetheless, whilst specialist surveys would not normally be justifiable on such a site, invertebrates have been considered in the impact assessment (based on habitat quality assessments and observations of taxa such as butterflies noted during the habitat survey in summer 2024).

⁵ A letter was sent to the landowners in early January 2026 in order to seek access for surveyors to examine these waterbodies and potentially survey them. At the time of writing, no reply had been received.

3.0 IMPACT ASSESSMENT METHODOLOGY

3.1 EcIA best practice

The assessment complies with best practice for impact assessment, as defined by CIEEM (2018) and BS 42020.

3.2 Mitigation hierarchy

Despite changes to the approach to impact assessment that will take place over time following the introduction of the Planning and Infrastructure Act 2025, at the time of writing, the approach to impact assessment was to follow the 'mitigation hierarchy'. This aims to avoid impacts through sensitive scheme design and, where this is not possible, mitigating residual negative effects as far as practically possible through (for example) careful timing of works to avoid sensitive periods (e.g. for nesting birds). If significant residual negative effects remain after impacts have been accounted for, compensation may be required to achieve neutrality, or, for habitats, to deliver measurable uplift post-development through the Biodiversity Net Gain (BNG) mechanism.

3.3 BS 42020

In respect of developments, BS 42020 Biodiversity (planning and development: Code of practice) offers a 'coherent methodology for biodiversity management and decision making' (BSI, 2013). BS 42020 is increasingly used to help protect and enhance UK biodiversity by (i) promoting transparency/consistency in respect of the quality and appropriateness of ecological information that is submitted as part of the planning process, (ii) by enhancing decision-making during the planning process, and (iii) by ensuring that developers comply with their statutory obligations and policy requirements. Ultimately, this is expected to lead to better outcomes for wildlife. Amongst other elements, BS42020 seeks to provide:

- Guidance on how to produce clear and concise ecological background information to accompany planning applications.
- Recommendations to consultants on expected professional ethics and conduct, on technical competence and on sound professional judgement. This is intended to give decision-makers confidence that proposals for biodiversity conservation in planning applications, and the subsequent decisions/actions associated with them, are sound and appropriate.
- A standardised framework to clearly demonstrate how biodiversity decisions have been arrived at during the development process, to minimise impacts and maximise gains.

3.4 Natural England Standing Advice

'Standing Advice' (SA) has been issued by Natural England to avoid the need for formal consultations in certain regularly occurring situations. It is a material consideration for local planning authorities when determining planning applications and is intended to achieve the following⁶:

- It avoids the need for developers and planning authorities to contact Natural England for an individual response on each planning application.
- It explains which survey methods are required to detect whether a protected species is present on a site and how such a species might use it.

⁶ From <https://www.gov.uk/guidance/protected-species-how-to-review-planning-applications>

- It helps local authorities agree on appropriate risk reduction and compensation measures to avoid harming protected species.

3.5 Ecological Receptors

In line with CIEEM (2018) each 'Important Ecological Feature' (hereafter referred to as an 'ecological receptor' for purposes of consistency across technical disciplines) and its significance has been determined by reference to national/local policy priorities for conservation of habitats, species, and sites, as well as to relevant nature conservation legislation. Geographical contexts are International, National, Regional (South-West), County (Wiltshire), District (Devizes/West Lavington), and site (within the red-line boundary). Allocation of a receptor to a geographic frame of reference is simple in the case of designated sites (e.g., a County Wildlife site is self-evidently of County value), but in the case of features of lower value, or for species, it is often a matter of professional judgement.

Impacts have similarly been assessed, in part, using professional judgement; wherever practical, decision-making has considered receptor characteristics, such as sensitivity, and impact characteristics, including extent, magnitude, duration, frequency, timing, and potential reversibility.

This report describes those receptors that were considered at the screening stage of the assessment (i.e., at the outset of the project), as well as those that were subsequently excluded from it (i.e., scoped out⁷) together with a rationale, as appropriate.

3.6 Significant effects

The EIA Regulations only necessitate consideration of 'significant effects'; according to CIEEM (2018) this relates to 'the weighting attached when decisions are made'. For purposes of this assessment, CIEEM guidance has been followed wherever possible, and a 'significant effect' (referred to in the impact summary table at the end of the impact assessment section) is considered as one that either 'supports or undermines biodiversity conservation objectives' - e.g., national, or local policy objectives or legislative obligations - for the identified ecological receptors.

3.7 Zones of Influence

CIEEM (2018) states that a 'zone of influence' for a project is *'the area over which an ecological feature may be affected by biophysical changes resulting from the proposed project and associated activities. This is likely to extend beyond the project site, for example, where there are ecological or hydrological links beyond the site boundaries.'* Receptors can be affected at varying distances from a site, depending on ecological characteristics, sensitivity to environmental change, and the type of impact. A zone of influence can be difficult (or sometimes impossible) to define precisely in spatial terms, but distances are referenced wherever possible/practical.

3.8 Design and consultation

Site design has evolved iteratively, with findings from ecological surveys informing the layout and landscape design, provided these were consistent with the commercial requirements of the scheme (for example, by retaining the hedge on the western edge and the bulk of the wooded belt along the southern edge). Consultation with Wiltshire Council was undertaken through a formal pre-app.

3.9 Ecological succession and assessment period

In the absence of development, habitats here are likely to remain largely as they are at present, with respect to species composition and structure, since management (mowing) is expected to continue.

⁷ The CIEEM 2018 guidelines note that Receptors can be scoped out of an assessment because 'they are not important enough to warrant further consideration or (unhelpfully) "because they will not be significantly affected"'.



The assessment of impacts for which baseline conditions have been described and impacts assessed covers the period of the baseline surveys, i.e., August 2024 to November 2025.

4.0 BASELINE CONDITIONS

4.1 Desk Study

4.1.1 *Protected sites within 2km*

Statutory sites (risk zones)

The site lies within the risk zones for the following statutory protected sites:

Salisbury Plain SPA

The application site lies within the 6.4km buffer zone of the Salisbury Plain SPA. Habitats Regulations Assessment (HRA) for the Wiltshire Core Strategy and Wiltshire Housing Site Allocations Plan screened residential sites within the buffer into the HRA due to the potential impact of recreational pressure on stone curlew *Burhinus oedicephalus* in combination with other plans and projects. The HRA concluded that there would be no adverse effects on site integrity for developments within 6.4km of the SPA boundary, provided that the mitigation scheme for the protected site continues to be implemented. SAC management/protection are currently implemented by Wiltshire Council; it is understood that delivery is financially underpinned by CIL contributions.

River Avon SAC

This lies 12.5km to the east, but the Site lies outside its hydrological catchment.

Great Cheverill Hill SSSI

This lies 2.05km south-west.

Bratton Downs SSSI

This lies 4.85km west.

Table 5.1 non-statutory sites within 2km (all are >0.5km distant from the proposed development site)

Site reference	Grid Reference	Site name	Area (ha)	Site description	Main habitat-type
ST95.016	ST996514	White Hill	34.90	A long and fairly steep north-facing chalk scarp - 820m distant at its closest point.	Calcareous grassland
ST95.019	ST987540	Shovel Wood	1.59	Woodland on a moderate to steep E-facing slope.	Broadleaved woodland
SU025.06	SU004541	Manor House Wood	17.55	A complex ancient woodland site with areas of dry and wet woodland around a private school.	Lowland, mixed deciduous woodland
SU05.028	SU015530	Ram's Cliff	25.07	Steep north and west-facing chalk scarp on the fringe of Salisbury Plain, with an extensive system of strip lynchets. Unimproved calcareous grassland occurs on steeper slopes throughout.	Calcareous grassland
SU05.036	SU005518	The Warren	55.40	Plantation Woodland	Conifer woodland

Semington Brook (which does not appear to be specifically covered under a nature conservation designation) lies 160m to the east.

4.1.2 **Protected / priority fauna within 2km**

Over 2400 records of fauna were returned during the data search, including several protected and or conservation priority (NERC Section 41) taxa. Relevant species (i.e. those that could potentially occur on the Site or within the potential zone of influence) have been taken into consideration, as follows:

Mammals

Hedgehog *Erinaceus europaeus* has been recorded within 2km, as has badger *Meles meles* and harvest mouse *Micromys minutus*. There are no records within 2km for Hazel dormouse.

Bats recorded within 4km include Serotine *Eptesicus serotinus* (roosts recorded within 200m), Noctule *Nyctalus noctula*, Common pipistrelle *Pipistrellus pipistrellus*, Soprano pipistrelle *P. pygmaeus*, Nathusius's pipistrelle *P. nathusii*, various *Myotis* sp., Long-eared *Plecotus* sp. (roosts recorded within 200m), Greater horseshoe bat *Rhinolophus ferrumequinum* (roosts recorded within 200m), Lesser horseshoe *R. hipposideros* and barbastelle *Barbastella barbastellus*.

The site falls well outside any Wiltshire Bat Consultation Zones, as the key bat sites in Wiltshire (and the consultation buffer zones around them) are over 10km to the west.

Birds - there are a large number of bird records for the 2km search area, including both common species as well as farmland priorities such as corn bunting *Emberiza calandra*, yellow wagtail *Motacilla flava*, yellowhammer *Emberiza citrinella*, linnet *Linaria cannabina*, and species more typically associated with scrub (an extensive belt of which bounds the site on its southern edge) such as whitethroat *Curruca communis*. There are also records within 2km for grassland hunting raptors such as barn owl *Tyto alba* and kestrel *Falco tinnunculus*.

Herpetiles – there are records within 2km of four reptile species - common lizard *Zootoca vivipara*, Slow worm *Anguis fragilis*, Grass snake *Natrix Helvetica* and Adder *Vipera berus* (for which there are two old records), as well as amphibians such as common toad *Bufo bufo* and common frog *Rana temporaria*. There are no records within 2km for great crested newt *Triturus cristatus*.

Invertebrates – there have been numerous invertebrate taxa recorded within 2km. There is a wide range of butterflies in the dataset, but many of these species (e.g., Adonis blue, *Polyommatus bellargus*) are associated with calcareous grassland rather than rank and species-poor, neutral grassland with herbs such as nettle (*Urtica dioica*) that characterise the Site.

4.2 **Habitats**

4.2.1 **Overview**

The Site comprises a former pasture that is fringed on its west side by a pair of species-poor native hedges (with a public footpath between them). These hedges are dominated by blackthorn (*Prunus spinosa*) with a little hawthorn *Crataegus monogyna*. The eastern of the two hedges extends into the field as recent scrub outgrowth. UK-Habitats Classification habitat-types are shown in Figure 6, below.

4.2.2 **Other broadleaved woodland w1g**

The southern end of the site comprises a belt of woodland dominated by sycamore *Acer pseudoplatanus*, with an understory mainly of suckering elm *Ulmus* sp (some of which is moribund) as well as hawthorn and bramble *Rubus fruticosus* agg over a species-poor field layer of Ivy *Hedera helix* and nettle patches; this is species-poor and dominated by young trees. It has been assigned and mapped as **w1g (other broadleaved woodland)**. The canopy includes beech *Fagus sylvatica* at its southeastern end.

4.2.3 **Other blackthorn scrub (outgrowth on west side) h3a6**

The young species-poor blackthorn outgrowth from the western edge has been assigned and mapped as **h3a6 other blackthorn scrub**.

4.2.4 **g4 Modified grassland**

Because of the sward impoverishment (often 100% cover of grass and a mean species-richness over 17 quadrats⁸ of only 4.12 sp/m²) and because of the abundance of notifiable agri-weeds and species indicative of local nutrient enrichment (e.g. common nettle *Urtica dioica*), the grassland was mapped as **UK Habitat Classification type g4 Modified grassland**⁹ (see Figure 04 below). The sward was dominated by Yorkshire fog *Holcus lanatus* and false oatgrass *Arrhenatherum elatius*, together with patches of competitive herbs such as common nettle, creeping thistle *Cirsium arvense*, spear thistle *C. vulgare*, common ragwort *Senecio jacobea* and occasional to locally abundant hogweed *Heracleum sphondylium* and field bindweed *Convolvulus arvensis*¹⁰.

The northern and eastern boundaries are securely fenced, and there is a derelict fence line in the centre of the field that once divided the field into two. The north and eastern fences separate the site from adjacent housing.

4.2.5 **Priority habitats**

Hedgerow is the only Priority Habitat within the red-line boundary.

The typical plant species in each mapped vegetation community is provided below, together with DAFOR (Dominant, Abundant, Frequent, Occasional and Rare) codes:

W1g - Other broadleaved woodland

<i>Acer pseudoplatanus</i>	sycamore (D)
<i>Fraxinus excelsior</i>	ash (O)
<i>Cornus sanguinea</i>	dogwood (O-R in understory)
<i>Ulmus</i> sp	suckering elm (LF-LD in understory)
<i>Crataegus monogyna</i>	hawthorn (LA in understory)
<i>Rubus fruticosus</i> agg	bramble (LD in sub-shrub layer)
<i>Urtica dioica</i>	common nettle (LD in the field layer)

H3a6 - Other blackthorn scrub

<i>Prunus spinosa</i>	blackthorn (LD)
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⁸ AME (2026) BNG Supporting Technical Report 19-03-26.

⁹ The sward is approaching transitional to g3c in places, because of the abundance of false oatgrass locally, but after consultation with experienced colleagues, it was concluded that g4 was the best fit, in part in view of its floristic impoverishment.

¹⁰ At the southern end of the site, there are a few very small pockets (a few square metres in extent) of what may have once been a slightly richer grassland; such areas are still floristically poor, but they support the finer-leaved grass species red fescue *Festuca rubra* as well as a few less competitive herbs such as yarrow *Achillea millefolium*.

Grassland

<i>Arrhenatherum elatius</i>	false oatgrass (LD)
<i>Holcus lanatus</i>	Yorkshire fog (LD)
<i>Festuca rubra</i>	red fescue (LA)
<i>Schedonorus arundinaceous</i>	tall fescue (O)
<i>Dactylis glomerata</i>	cock's-foot (LF)
<i>Trisetum flavescens</i>	yellow oatgrass (R)
<i>Achillea millefolium</i>	yarrow (R)
<i>Cirsium arvense</i>	creeping thistle (O)
<i>Cirsium vulgare</i>	spear thistle (D)
<i>Convolvulus arvensis</i>	field bind weed (O)
<i>Daucus carotta</i>	wild carrot (R)
<i>Geranium dissectum</i>	cut-leaved cranesbill (R)
<i>Galium aparine</i>	cleavers (LF)
<i>Poa pratense</i>	smooth-stalked meadowgrass (R)
<i>Ranunculus repens</i>	creeping buttercup (R-O)
<i>Rumex acetosa</i>	common sorrel (R)
<i>Rumex obtusifolius</i>	broad-leaved dock (LF)
<i>Epilobium montanum</i>	broad-leaved willowherb (LF)
<i>Epilobium hirsutum</i>	great willowherb (O-LF)
<i>Senecio jacobaea</i>	common ragwort (LD)
<i>Heracleum sphondylium</i>	hogweed (O)
<i>Urtica dioica</i>	common nettle (LD)

h2a6 - Other native hedgerow

<i>Prunus spinosa</i>	blackthorn (LD)
<i>Crataegus monogyna</i>	hawthorn (O)
<i>Fraxinus excelsior</i>	ash (R)

Plate 1 Typical view (to north) across species-poor grass sward prior to a hay crop being taken (September 2024)



Plate 2 View of wooded belt in the south from within field (November 2025)

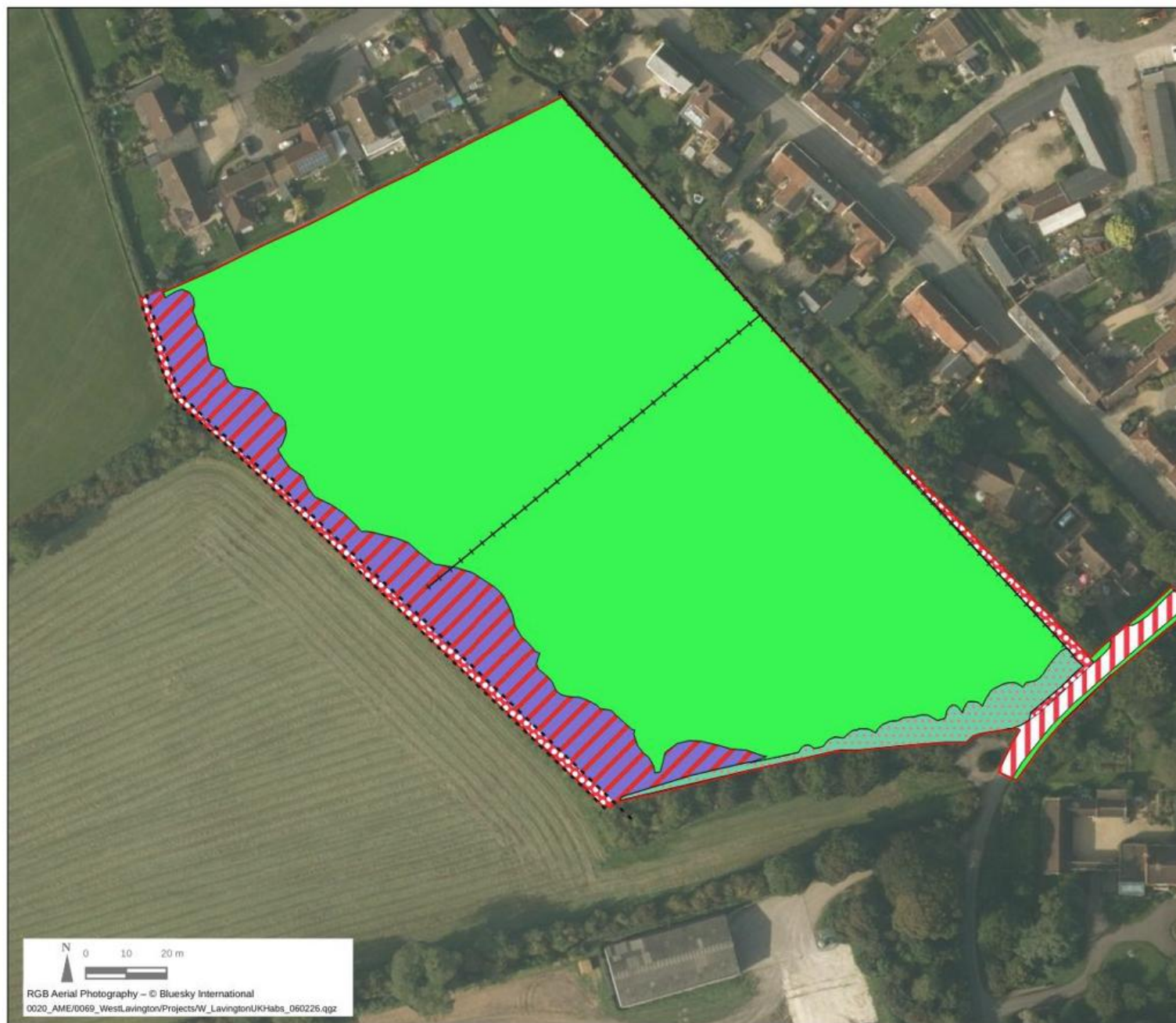


Plate 3 View along the Semmington Brook c15m east of the site



Plate 4 View into a typical section of woodland canopy on the southern boundary of the site, showing extensive ivy cover on many trees and the modest age of the canopy





Key

- g4 modified grassland
- h3a6 (other blackthorn scrub)
- w1g(33) other broadleaved woodland
- u1c artificial unvegetated unsealed surface
- u1b developed land sealed surface
- h2a6 Other native hedgerow
- u1e fence line (612)
- Site boundary

4.3 Fauna

4.3.1 *Badger*

No evidence of badgers was found during the initial habitat survey in summer 2024. However, as this species is known to occur locally and, of course, because setts can be excavated quickly, the site was subject to a detailed resurvey during November 2025; no evidence of badger was found during either survey, and the species is assumed to be absent from the site / immediate surrounds at present.

4.3.2 *Dormouse*

No evidence of dormouse was found during the 2024-25 dormouse survey, details of which are provided in Table 6.2 below.

Table 4.2 Dormouse survey results

Date	Time of Day	Wind (Beaufort Scale)	Cloud Cover (%)	Conditions	Rain	Temperature (°C)	Number of Tubes	Dormouse Presence	Notes
10 th August 2024	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Greg Nightingale Deployment
9 th September 2024	11:15-12:15	3	90%	Overcast	None	14	45	No dormouse observed	Lorna Roberts Start of a wood mouse nest found
30 th September 2024	11:20-12:20	3	100%	Overcast	None	15	46	No dormouse observed	Sarah Cruickshank Wood mice were found, including animals themselves and nests
17 th October 2024	14:15-15:15	4	50%	Sunny intervals	None	16	48	No dormouse observed	Sarah Cruickshank Wood mice were found, including animals themselves and nests
25 th November 2024	10:15-11:15	4	60%	Sunny intervals	None	14	48	No dormouse observed	Lorna Roberts
23 rd April 2025	11:00-12:00	2	50%	Sunny intervals	None	14	48	No dormouse observed	Lorna Roberts Some inserts re- instated
29 th May 2025	16:00-17:00	2	50%	Sunny intervals	None	19	48	No dormouse observed	Sarah Cruickshank Some inserts re- instated

Date	Time of Day	Wind (Beaufort Scale)	Cloud Cover (%)	Conditions	Rain	Temperature (°C)	Number of Tubes	Dormouse Presence	Notes
24th June 2025	15:00–16:00	4	50%	Sunny intervals	None	23	48	No dormouse observed	Sarah Cruickshank Butterflies noted
2nd August 2025	15:30–17:15 (incl. collection)	4–5	50%	Sunny	None	21	48	No dormouse observed	Sarah Cruickshank

4.3.3 *Harvest mouse*

A nest survey of the (uncut) edge grassland habitat was undertaken in October 2024 for this declining national priority species using the Mammal Society search method for determining presence. The methodology is set out in the following document:

<https://static1.squarespace.com/static/654a3265fcbd755384b0552f/t/66bc6eed0ae5a36996211692/1723625199399/National-Harvest-Mouse-Survey-Protocol-V2.2+-+2022-11-24.pdf>.

No evidence of this species was found during the survey.

4.3.4 *Bats*

Static Logger Surveys

Combined results from the three static logger deployments in 2024-25 are presented below:

A total of 3,166 separate bat calls (or bat ‘passes’) were recorded during the survey. Overall, activity was dominated by common pipistrelle, driven by a particularly high population in October 2024 at Location 1, along the wooded southern edge. If this peak is removed from the data and replaced with the mean level from previous months for this location, *Nyctalus* becomes the most abundant group on site by approximately 5%, with common pipistrelle the second most abundant.

Chart 5.1 below shows the proportion of bat passes recorded at each static location during August to October 2024 and during April to July 2025 (i.e. five nights per month). Chart 4.2 shows the monthly distribution of bat passes during the same period at each location. In both charts, the dominance of the common pipistrelle is evident (53.57%, again; largely due to the October peak).

The second most abundant group was *Nyctalus* species (with Noctule and Leisler’s making up 26.72% of the total) followed by *Myotis* (7.11%) and soprano pipistrelle (5.12%). The remaining seven species/species groups combined accounted for approximately 7.5% of all passes.

Overall, levels of bat activity were highest at Location 1 (the southern woodland belt), which accounted for over 58% of all passes. The prevalence of bats along this feature may be due to an increased level of shelter and/or perhaps elevated levels of insect prey compared to the more open locations of 2 (on the western boundary) and 3 (in the open field centre).

Except for a spike in activity during October at Location 1, the pattern of activity was generally lower in spring and autumn when bats spend more time in torpor, and higher during the warmer summer months, as expected.

Chart 4.1 Proportion of bat passes at each logger locations (all species combined)

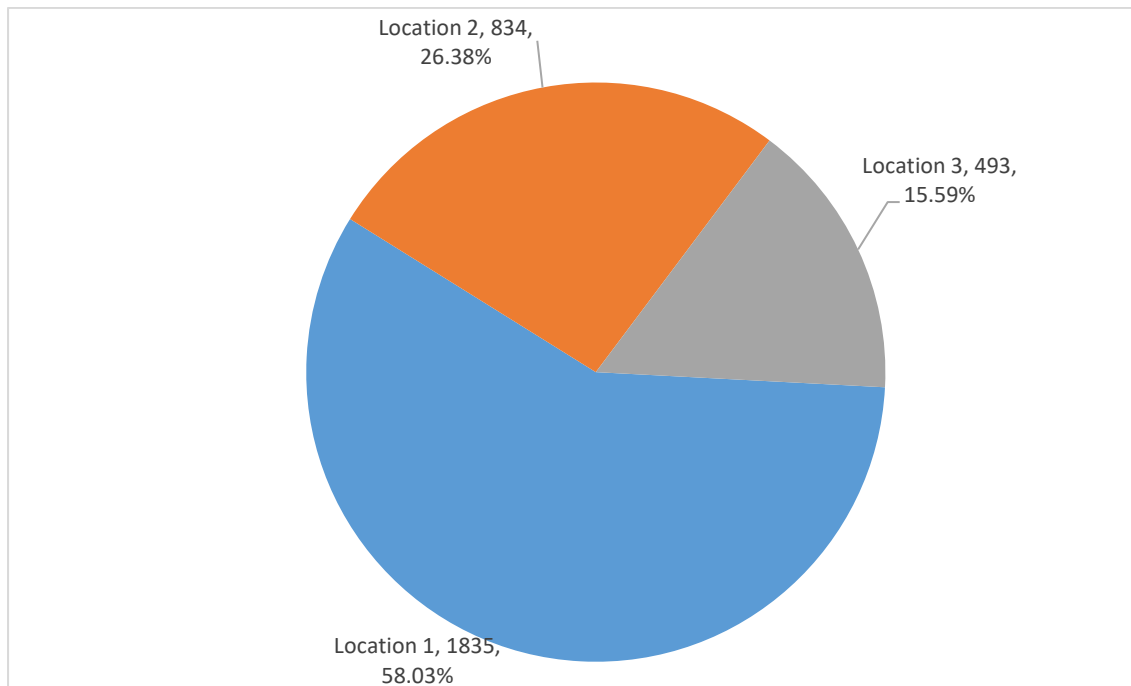


Chart 4.2 Bat passes recorded during survey season each location

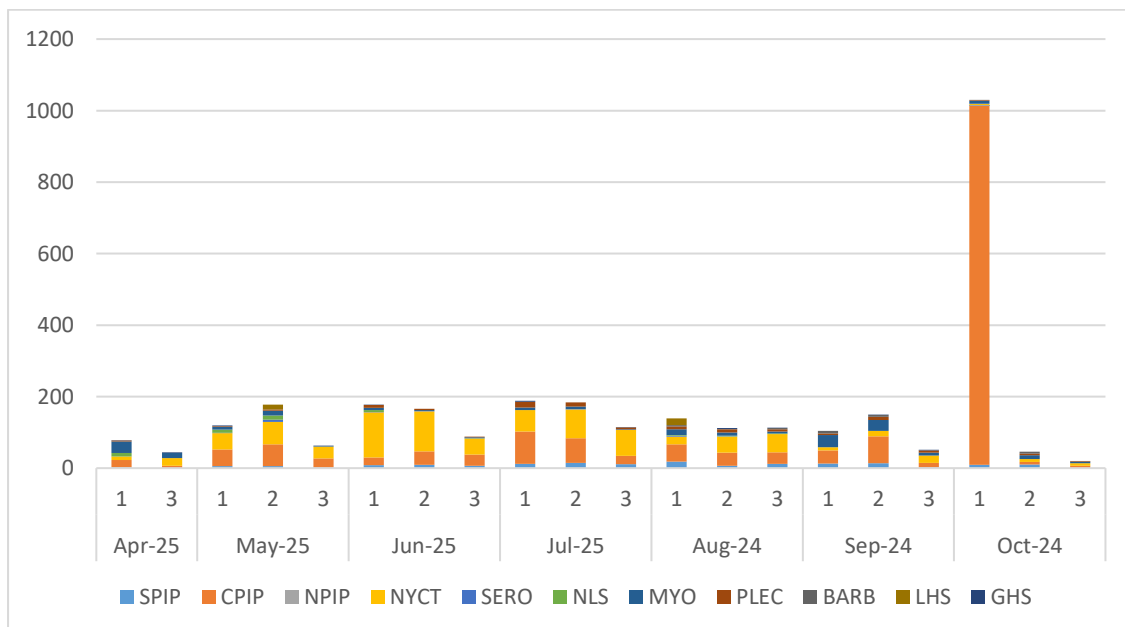


Chart 4.3 Bat passes by species (all locations combined)

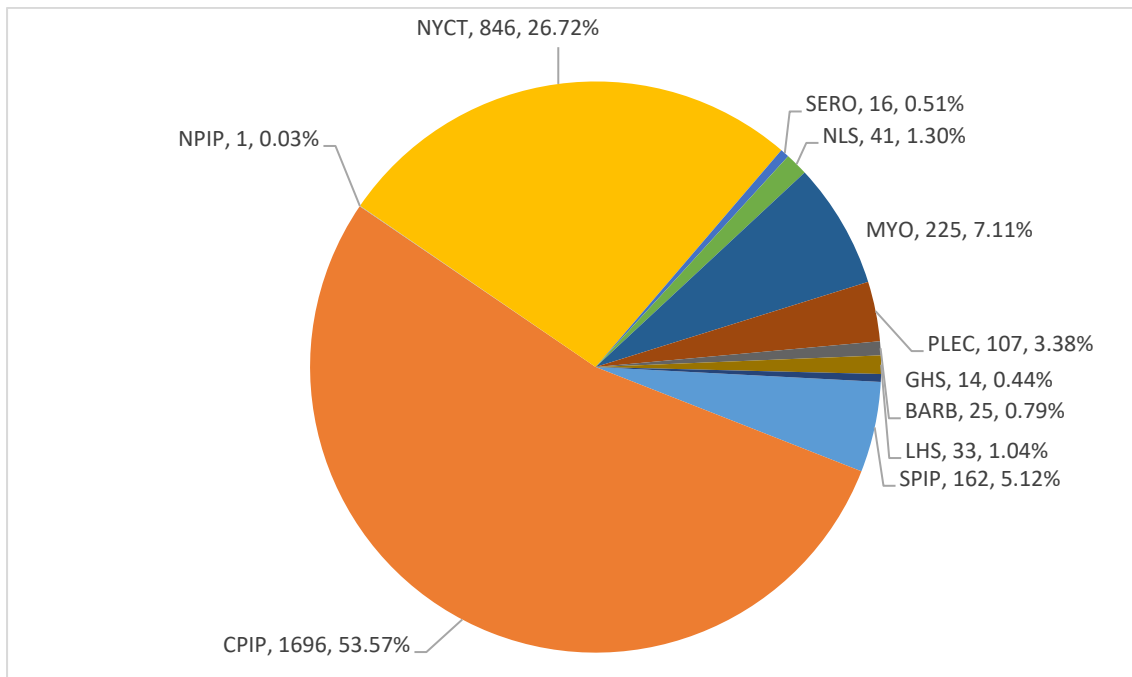


Chart 4.4 Proportion of bat passes at location 1 by species

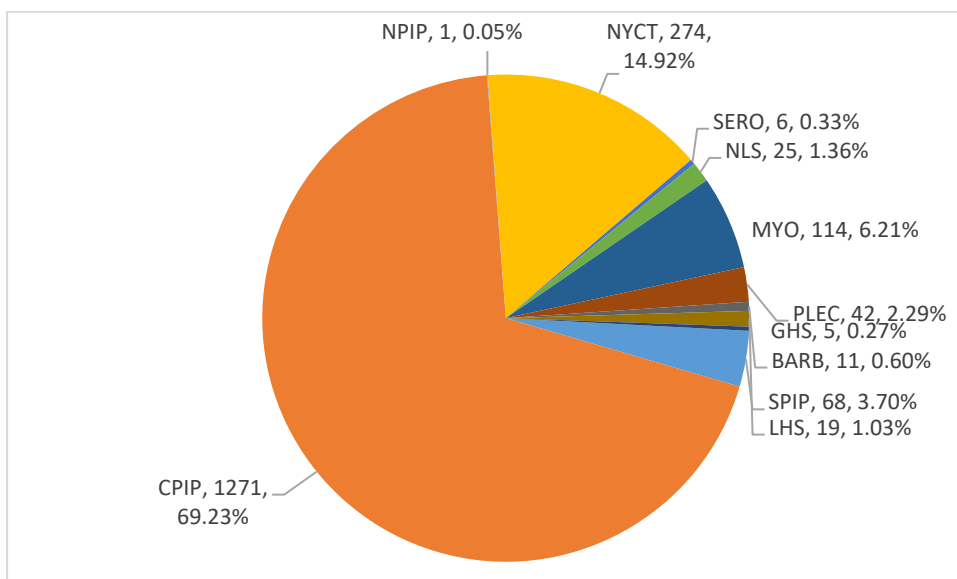


Chart 4.5 Proportion of bat passes at location 2 by species

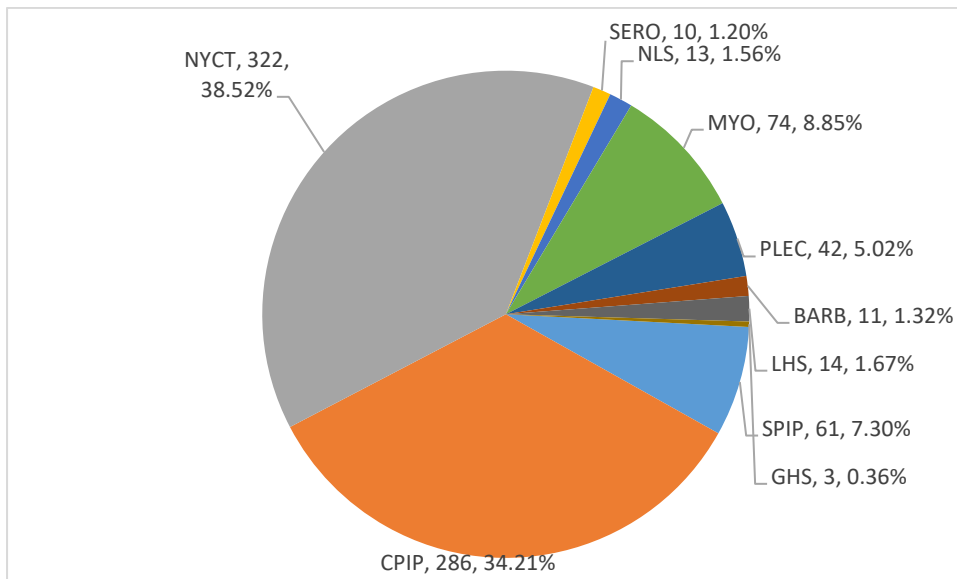
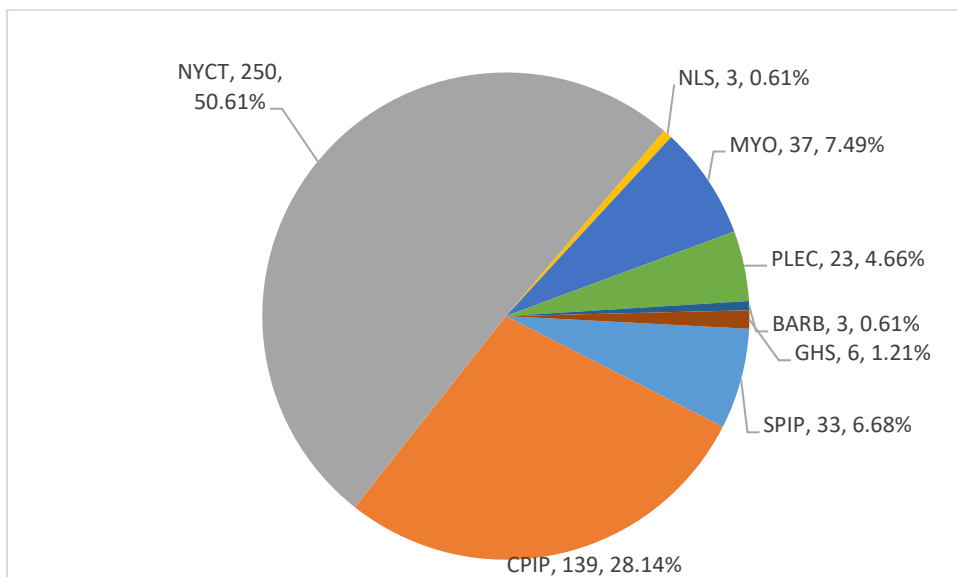


Chart 4.6 Proportion of bat passes at location 3 by species



Analysis: breakdown by species/species group

Pipistrelles

Common pipistrelle was the most frequently recorded species, accounting for 53.57% of all passes; the majority of these were recorded at Location 1 along the southern woodland belt (1,271 passes, with a peak of 1,006 in October). Soprano pipistrelle passes were recorded in low numbers, accounting for just 5.12% of all bat activity. The highest number for this species was 68 passes, again at Location 1.

A single Nathusius's pipistrelle pass was recorded in October 2024 at Location 1. It is not uncommon for this nationally rare bat to be recorded in very low numbers, especially in the autumn when individuals have been shown to migrate from continental Europe.

Nyctalus

These species have loud calls that can be detected from several tens of meters away. It is therefore harder to obtain a precise picture of the distribution of activity on a site, since species flying high overhead or in adjacent habitat can still be detected by static detectors. The highest number was recorded at Location 2 (on the western boundary), with 322 passes. This group were the most abundant species (or species group) recorded at both Locations 2 and 3 (open field).

Serotine

A total of 16 passes from this species were recorded overall, accounting for 0.51% of all passes. The number of passes was greatest at Location 2 (western boundary) with 10 passes; the species was not recorded at Location 3 in the open field.

NLS (*Nyctalus*/Leisler's/serotine - species not confirmed)

This group was most abundant at Location 1 (along the south woodland belt) with 25 passes in total. Bats flying close to a wooded edge typically exhibit more frequency-modulated (FM) echolocation calls. Therefore, calls from *Nyctalus* bats, which are more easily distinguished from serotine in open habitats (such as Locations 2 and 3), become more similar in measured parameters, which may account for the higher apparent call counts from this group at this location.

Ecobat analysis - horseshoe bats, barbastelle, *Myotis* and *Plecotus* bats

These are among the rarest nationally and/or the most light-avoiding species likely to be encountered at this site and hence arguably also the most susceptible to development impacts. The Mammal Society's Ecobat online tool was therefore used to analyse call data from these species (or species groups), enabling a quantitative comparison of the value of the proposed development site with other sites in the region over the same period.

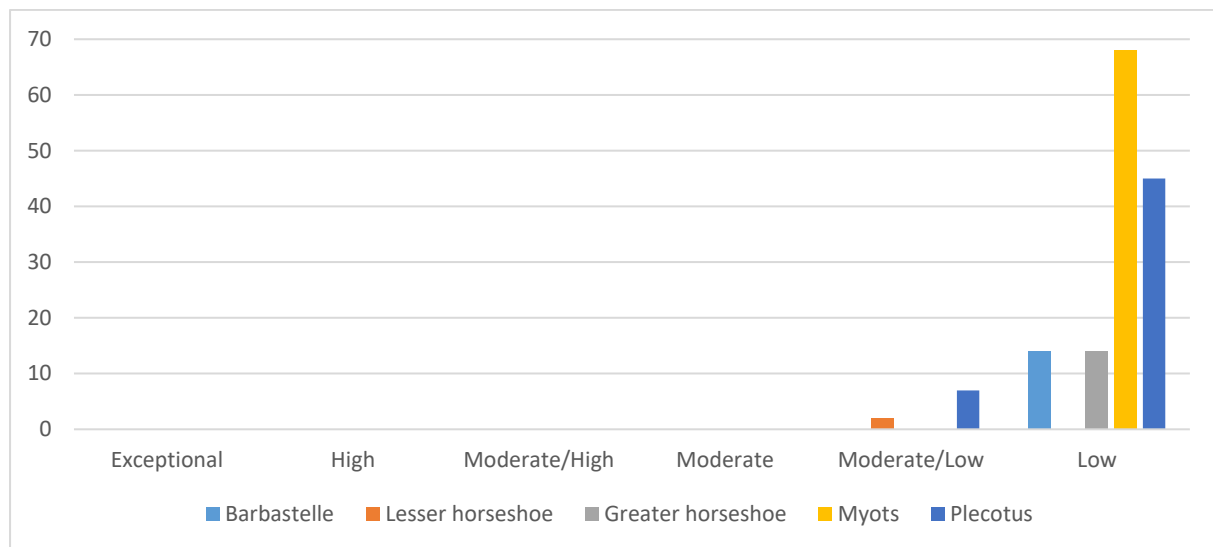
Results from Ecobat (Table 5.3 and Chart 5.7, below) show that all nights on which these species were recorded exhibited Low (occasionally Low/Moderate) activity levels compared with data from other sites in the Ecobat database for the Southwest UK region. There were no nights of Moderate, High, or Exceptional activity for any of the species, which strongly indicates that the site is of low importance in a regional context for all five species/species groups.

Table 4.3 Nights of Low to Exceptional bat activity (from Ecobat)

	Exceptional	High	Moderate/High	Moderate	Moderate/Low	Low
Barbastelle	0	0	0	0	0	14
Lesser horseshoe	0	0	0	0	2	0
Greater horseshoe	0	0	0	0	0	14
Myotis	0	0	0	0	0	68
Plecotus	0	0	0	0	7	45

NB. The number of nights used in the Ecobat comparisons was over 1,000

Chart 4.7 Nights of Low to Exceptional bat activity (from Ecobat)



Lesser and greater horseshoe bat

The two nights of Moderate/Low activity for lesser horseshoe were recorded in May 2025 at Location 2 on the western boundary and in August 2024 at Location 1 on the southern woodland edge (where 14 and 19 passes, respectively, were recorded). This species was not recorded during any other session.

Greater horseshoe bat was recorded on only 14 nights in total, at all three locations, but always in very low numbers; no more than two passes were recorded during any one session.

Ecobat can also be used to analyse the number of bat calls recorded before the upper time of the species-specific roost emergence time range (Russ 2012); depending on the recorded times of passes, this can potentially indicate the presence of nearby roosts.

A total of 10 lesser horseshoe bat passes were recorded during this period; whilst this may indicate a small roost nearby, if a significant roost were to be located very close to the site boundary, more calls within this time range would be expected.

Only one greater horseshoe bat pass was recorded within the known emergence time range for this species, and neither was recorded during the main maternity roost period of mid-June to the end of July.

Plecotus sp.

These light-averse species have very quiet calls and must fly within a few meters of a detector to be recorded; hence, they are likely underrepresented in this type of dataset. During most of the monthly sessions, they were either absent from the data altogether or were recorded only in single figures; the exceptions were seven nights of Moderate/Low activity in July 2025 at Locations 1 and 2, and in August 2024 at Location 2.

Seven passes from *Plecotus* (out of 107 in total) were recorded within the known emergence times. None were recorded during the main maternity roost period of mid-June to the end of July.

Barbastelle

This nationally rare species was recorded on only 15 nights during the entire survey; a Low level of activity in a regional context according to Ecobat. A total of 25 passes were recorded, with the highest number, seven, in September at Location 1 (i.e., just over one pass per night).

No barbastelle passes were recorded during the species' known roost emergence times, indicating that there is unlikely to be a nearby roost.

Myotis sp.

All nights on which bats from these taxa were recorded showed Low levels of activity. *Myotis* passes accounted for 7.11% of all bat passes with a total of 225.

For *Myotis* bats, 19 passes (out of the 225 recorded in total) were within known emergence times, with the majority (14) being at Location 1 on the southern boundary. Only four were recorded during the main maternity roost period, so there is a low possibility of a roost associated with breeding activity being present nearby.

Results of ground-based tree assessment for potential bat roost features

The only trees that would be lost to the development are those at the point where the access road is proposed to enter the site from White Street, i.e., in the southeastern corner. The access point here was carefully designed to avoid any mature or other possibly significant trees, and the only habitat that would be removed to facilitate it is scrub comprising suckering elm around 18-20' high and a single young twin-stemmed sycamore (T17 on the baseline plans prepared by Aspect Tree Consultancy). It was possible to inspect this area closely during the November 2025 ground-based inspection, and, in the surveyor's opinion, there is no significant potential for bat roosts in this section of vegetation.

4.3.5 Birds

During habitat and subsequent fauna surveys, records were made of calling birds and overflying species, and during bat activity sessions, surveyors were alert for nocturnal species such as owls. However, all the records made during these survey sessions were of widespread and relatively abundant species of relatively urban environments - for example, wood pigeon *Columba palumbus*, blackbird *Turdus merula*, blue tit *Cyanistes caeruleus*, great tit *Parus major*, wren *Troglodytes troglodytes*, chaffinch *Fringilla coelebs* and robin *Erithacus rubecula*. Such species were considered likely to breed in the hedges, scrub and woodland that fringe the site. Other species that were recorded within or on the edge of the site included Starling *Sturnus vulgaris* and house sparrow *Passer domesticus* in reasonable numbers (up to 10 of each species) on several occasions during autumn 2024 on the western and southern site peripheries; both species are likely to breed in buildings nearby, rather than on-site.

In addition to the above incidental records, a detailed breeding bird survey was undertaken in spring 2025; digital maps from the six survey sessions are included in **Appendix 2**. Summary data from the BBS survey are presented below in Tables 4.4 and 4.5; the results demonstrated that the site is likely to be of importance for breeding and foraging species at a Site level only:

Table 4.4 Breeding Bird Survey 2025 – Prevailing Weather Conditions

Visit	Date	Time	Weather	Temperature	Wind
1	02/04/2025	07:11 - 0830	Fine, dry, scattered cloud	10 C	11mph/ENE
2	23/04/2025	06:26 – 07:50	Overcast, light drizzle	9 C	8/WNW
3	07/05/2025	06:00 – 07:40	Fine, scattered cloud	8 C	6/NE
4	29/05/2025	05:45 – 07:01	Fine, overcast	15 C	12/SW
5	20/06/2025	05:50 – 07:05	Fine, scattered cloud	19 C	8/ESE
6	03/07/2025	06:04 – 07:10	Fine, clear skies	3 C	2/NW

Table 4.5 Breeding Bird Survey 2025: status of all species recorded

Common Name	Scientific	BTO Code	BoCC 5 Status	Breeding Status
Dunnock	<i>Prunella modularis</i>	D	Amber	Probable
Wood pigeon	<i>Columba palumbus</i>	WP	Amber	Probable
Wren	<i>Troglodytes troglodytes</i>	WR	Amber	Probable
Blackbird	<i>Turdus merula</i>	B	Green	Probable
Blue tit	<i>Cyanistes caeruleus</i>	BT	Green	Probable
Great tit	<i>Parus major</i>	GT	Green	Probable
Magpie	<i>Pica pica</i>	MG	Green	Probable
Robin	<i>Erithacus rubecula</i>	R	Green	Probable
House sparrow	<i>Passer domesticus</i>	HS	Red	Probable
Blackcap	<i>Sylvia atricapilla</i>	BC	Green	Possible
Carrion crow	<i>Corvus corone</i>	C	Green	Possible
Chiffchaff	<i>Phylloscopus collybita</i>	CC	Green	Possible
Collared dove	<i>Streptopelia decaocto</i>	CD	Green	Possible
Goldfinch	<i>Carduelis carduelis</i>	GO	Green	Possible
Greenfinch	<i>Chloris chloris</i>	GR	Red	Possible
Great black-backed gull	<i>Larus marinus</i>	GB	Amber	Non-breeding
Kestrel	<i>Falco tinnunculus</i>	K	Amber	Non-breeding
Swallow	<i>Hirundo rustica</i>	SL	Amber	Non-breeding
Chaffinch	<i>Fringilla coelebs</i>	CH	Amber	Non-breeding
House martin	<i>Delichon urbicum</i>	HM	Amber	Non-breeding
Jackdaw	<i>Corvus monedula</i>	JD	Green	Non-breeding
Great spotted woodpecker	<i>Dendrocopos major</i>	GS	Green	Non-breeding
Red kite	<i>Milvus milvus</i>	KT	Green	Non-breeding

Herring gull	<i>Larus argentatus</i>	HB	Red	Non-breeding
Song thrush	<i>Turdus philomelos</i>	ST	Red	Non-breeding
Swift	<i>Apus apus</i>	SI	Red	Non-breeding

4.3.6 Reptiles

The survey found that the site supports a breeding population of a single reptile species, the common lizard, with good numbers recorded in September in the northern half of the site.

Returns declined towards the end of the survey period, when animals were presumably beginning to enter torpor for longer periods as night-time temperatures fell.

Returns were exclusively from the northern half of the site, with almost all records made along the site margins in this area; only one record was made in the middle of the field, and no records at all were made in the southern section of the site (which may relate to previous management activities).

Table 4.6 Results of reptile survey

Visit number	Date	Weather	Start time	End time	Results	Location
1	27-08-24	Cloud 9 Wind 0-2 Temp 20°	09.26	10.15	5x common lizard (1 adult m & 4 adult f)	2 on the west boundary and 1 in the field centre
2	02-09-24	Cloud 5-8 Wind 1 Temp 19°	08.50	09.30	1x common lizard (adult m)	Halfway along the west boundary
3	00-09-24	Cloud 4 Wind 2 Temp 17°	11.00	12.00	8x common lizard 5 f, 3m	N, E and W margins
4	12-09-24	Cloud 4 Wind 3 Temp 15°	10.30	11.20	15x common lizard 4 f, 4 juveniles, 7m	N, E and W margins
5	26-09-24	Cloud 7 Wind 3 Temp 15°	08-51	09-30	1 f common lizard	N edge
6	30-09-24	Cloud 8 Wind 3 Temp 16°	10.07	10.31	1f common lizard	N edge
7	07-10-24	Cloud 2-3 Wind 0 Temp 14°	10.15	11.30	None recorded	None recorded

4.3.7 Invertebrates

A range of grassland invertebrate species were recorded during the initial (summer) habitat survey, with conspicuous taxa being marbled white butterfly *Melanargia galathea*, gatekeeper butterfly

Pyronia tithonus, small skipper butterfly *Thymelicus sylvestris*, cinabar moth *Tyria jacobaeae* (caterpillars on ragwort) and meadow grasshopper *Chorthippus parallelus*.

5.0 VALUE AND SENSITIVITY OF RECEPTORS

5.1.1 *Designated sites*

Apart from the Salisbury Plain SPA (see below), there are no statutory wildlife sites that appear to be sensitive to a proposed development in this location, as there are no discernible ecological pathways from the site to them. The site is fringed by urban development to the north and east, and all the non-statutory sites within 2km are more than 500m distant. Therefore, in addition to the SPA below, all other designated sites identified in the baseline section are excluded from the impact assessment at this stage.

Salisbury Plain SPA

As stated in the baseline section, the application site is within the buffer zone of the Salisbury Plain SPA and the HRA undertaken for the Wiltshire Core Strategy / Wiltshire Housing Site Allocations Plan screened residential developments in this buffer due to the possible impact of recreational pressure on stone curlew *Burhinus oedicnemus* populations (in combination with other plans and projects). The HRA concluded that there would be no adverse effects on site integrity for developments more than 6.4km from the SPA boundary, provided the SPA mitigation scheme continues to be implemented.

This designated site is important at an international level and is therefore included in the impact assessment.

5.1.2 *Habitats*

The main habitats of potential nature conservation interest that require removal to facilitate development are (apart from the majority of the species-poor grassland in the field) two sections totalling 8.2m width of the easternmost of the double hedge that flanks the western edge of the field to accommodate two footpaths; these hedges are both species-poor and appear to be relatively recent 'enclosure' features, as evidenced by the absence of woodland indicators and impoverished character (a poor field layer is dominated by ivy).

A sparse blackthorn scrub is invading the field from the western boundary; apart from a section in the north that would be retained, the remainder would be largely removed, in part for landscape reasons and in part to facilitate habitat enhancement for reptiles displaced from the clearance of vegetation in the main field to accommodate the development.

Some 17.3m section of woodland belt in the south-eastern corner of the site would be removed to facilitate an access road off White Street. This is of recent origin; it is probably an outgrown enclosure hedge with planted beech trees and self-seeded sycamore within it; the field layer is floristically very impoverished, being dominated by ivy.

Habitats are important at a District level and are included in the impact assessment.

5.1.3 *Fauna*

Bats

Wray *et al.* (2010) is cited for its valuation of overall habitat, as it remains a useful reference. Tables 6-1 and 6-2 below set out the scoring system referred to:

Table 5.1 Valuation of bat habitat

<i>Species</i>	<i>Number of bats</i>	<i>Roosts/potential roosts nearby</i>	<i>Foraging habitat characteristics</i>
<i>Common (2)</i>	<i>Individual bats (5)</i>	<i>None (1)</i>	<i>Industrial or other sites without established vegetation (1)</i>
-	-	<i>Small number (3)</i>	<i>Suburban areas or intensive arable land (2)</i>
<i>Rarer (5)</i>	<i>Small number of bats (10)</i>	<i>moderate number/Not known (4)</i>	<i>Isolated woodland patches, less intensive arable and/or small towns and villages (3)</i>
-	-	<i>large number of roosts, or close to a SSSI for the species (5)</i>	<i>larger or connected woodland blocks, mixed agriculture, and small villages/hamlets (4)</i>
<i>Rarest (20)</i>	<i>large number of bats (20)</i>	<i>Close to or within a SAC for the species (20)</i>	<i>Mosaic of pasture, woodlands and wetland areas (5)</i>

Table 5.2 Scoring system

<i>Geographic frame of reference</i>	<i>Score</i>
<i>international</i>	<i>>50</i>
<i>national</i>	<i>41 - 50</i>
<i>Regional</i>	<i>31 - 40</i>
<i>County</i>	<i>21 - 30</i>
<i>district, local or parish</i>	<i>11 - 20</i>
<i>Not important</i>	<i>1 - 10</i>

This assessment approach (which needs to be tempered through local knowledge and professional judgement) is based on the scarcity in the landscape of some species compared to others, as well as on the potential sensitivity of a species to development – for example, to physical loss of commuting features or to the effects of artificial lighting spill, as well as habitat context. Horseshoe bats, long-eared bats, barbastelle bats, and *Myotis* bats (all of which were recorded in low numbers during this survey) are particularly sensitive to the effects of artificial lighting. Bats are included in the impact assessment, and the following species/groups were assessed, as follows:

- Common species: Pipistrelles: common species (2) + low number of bats (10) + number of roosts nearby unknown (4) + woodland, pasture, small towns / villages (3) = **Score 19 (District importance)**
- Rarer species: serotine/noctule / *Myotis*: rarer (5) + individual bats (5) + number of roosts unknown (4) woodland, pasture, small towns/villages (3) = **Score 17 (District importance)**
- Rarest species: rarest (20) + individual bats (5) + none-small number (2) woodland, pasture, small towns/villages (3) = **Score 30 (County importance)**

Western European hedgehog

This species appears from the desk study to be quite abundant locally, and it could potentially feed on site in grassland. Hedgehogs are under pressure nationally due to land-use change, pesticide use, increasing urbanisation, and habitat fragmentation; for these reasons, this species is listed as a priority under Section 41 of the NERC Act.

Hedgehogs are sensitive to inadvertent killing and injury during the clearance of scrub/hedge habitat, where they are likely to seek refuge during the day or hibernate during winter. A precautionary mitigation approach has therefore been adopted, with this species included in the impact assessment. Hedgehog is assessed as of likely **District importance**.

Birds

Records of calling and flying birds and data from the BBS indicated that this site supports a suite of widespread breeding species, but that farmland priority species do not currently breed here. However, nesting birds utilising scrub and hedges would be sensitive to unmitigated vegetation clearance during spring and summer, and nests and eggs of all the recorded species on site are protected under the Wildlife and Countryside Act 1981. Birds are therefore included in this impact assessment because of their legal protection, although the assemblage is considered of likely **Site importance**.

Reptiles

The common lizard is locally abundant in south-west England, and the survey demonstrated that a breeding population is present in the northern half of the field, mainly along the margins. Such species are sensitive to killing and injuring during site clearance, and the population is assessed as of **District importance**. Reptiles are included in the impact assessment.

Amphibians

There are no records of the protected amphibian, the great crested newt (GCN), within 2km, but there are two water bodies visible on OS maps and aerial photographs within 500m. Neither was accessible at the time of writing¹¹, so no physical inspection or amphibian survey has yet been conducted. Clearly, if GCN were present on site during the terrestrial phase of the life cycle (within grassland/scrub/woodland or hedges), it would be a material consideration, as all such habitats would be directly affected by the proposals.

Given the proximity of the ponds, a precautionary approach has been adopted, and amphibians are included in the impact assessment as a district-level **receptor**.

Invertebrates

The principal affected habitat on site (grassland) contains very few herbs and is periodically mown; it has low floristic diversity, lacks flower-rich areas, and lacks nectar-rich south-facing slopes that would be required to support a diversity of invertebrate species. Based on the types of habitats present, the invertebrate assemblage is likely to be of **Site importance**. Invertebrates are included in the impact assessment.

¹¹ A letter was sent to the landowners in early January 2026 to seek access for surveyors to examine these waterbodies and potentially survey them. At the time of reporting, no reply had been received.

6.0 IMPACT ASSESSMENT INCLUDING MITIGATION

6.1 Definitions of construction and operational phases

6.1.1 Construction

The construction phase includes preparatory works such as initial vegetation clearance, the subsequent build, and ecological mitigation activities (e.g., grassland scarification prior to wildflower seeding).

6.1.2 Operational

The operational phase comprises post-development use, including ongoing management of retained habitats, activities associated with occupied dwellings, and routine site maintenance.

6.2 Designated sites

It is understood that there is no requirement for a per-dwelling payment (over and above any CIL levy that might be needed for the scheme) in order to part-fund conservation management of the SPA - providing that the quantum of planned housing within the visitor catchment (i.e. the 6.4km SPA buffer) does not exceed figures considered in the already-completed HRA. There is no requirement for a separate HRA or for bespoke mitigation measures to ensure that development in this location would not adversely affect the integrity of the SPA and its qualifying features.

6.3 Habitats

6.3.1 Construction phase

Design has taken into account the need to retain, as far as is practical given the sites' relatively small size, key habitat features such as the double western- hedge (where there are two c4m breaches of one of the two western boundary hedges to accommodate footpaths) and the southern wooded belt, where there would be a single 17.3m breach to accommodate the access road.

Most of the grassland within the field would be stripped during construction to accommodate the main development footprint, comprising housing, roads, gardens, parking, drainage facilities, including an attenuation basin and SUDS swales, on the western edge of the site. An approximately 10 m-wide grassland belt would remain along the western edge of the site to enhance grassland habitat and mitigate impacts on reptiles. This belt would be Heras-fenced during construction to prevent damage associated with plant access, and the sparse scrub would be removed to create a more optimal habitat for reptiles.

This direct impact upon habitats would result in a certain, permanent loss of the following features: -

Table 6.1 Key habitats lost to development

UK habitats classification habitat-types	Area (ha)	Length (m)
Area habitat-types		
G4 low species richness grassland: loss to main development/infrastructure, including attenuation basin, SUDs and other services.		n/a
h3a6 other blackthorn scrub: loss to SUDs drainage (and to facilitate species-rich grassland creation, hedge laying and enhancement for reptiles)		
w1g other woodland (broadleaved): loss of saplings and young sycamore to access road in SE corner	17.3m wide strip (c 112m ² area)	
Linear habitat-types		
h2a6 Other native hedge (species-poor): two c4m sections of the easternmost of the two parallel hedges that run along the western boundary of the site would be removed to accommodate footpaths. 8.3m wide in two sections (4.3m and 4.0m) 8.3m	n/a	8.3m

Other potential impacts during construction include a risk of damage to trees on the southern edge of the site, because of compaction through plant movement, as well as deposition of material on roots and potential for (root) severance.

Overall, the development would have a significant negative impact on an ecological feature of Local (parish) value, largely due to the extensive loss of species-poor grassland.

Mitigation measures

The southern woodland belt and hedged western boundary would be securely fenced with Heras fencing at the appropriate distances as advised by the consultant arboriculturists, to avoid impacting root protection zones during construction. These measures (together with habitat enhancement and creation measures described below) would be set out within a Construction Environmental Management Plan (CEMP).

Residual effects

Taking avoidance measures through design into account, the impact of a development on habitat loss, following implementation of protective measures, would be a **major negative** impact on an ecological feature (habitats) of **District value**.

Compensation

In view of the habitats that would be permanently lost to the development (principally species-poor grassland in the main part of the field, as well as c8m of species-poor native hedge and c110m² of the southern wooded belt) and the significant residual impact resulting from this, a suite of proposals for compensatory habitat enhancement/creation has been proposed within the redline¹².

¹² Additional measures for offsite compensation would also be required via a mechanism that would need to be agreed in advance with WC.

The key measures required to offset impacts, as far as practicable, with respect to habitats are described below:

In the southern section of the site (i.e. within the root protection zone) as well as on the western boundary beyond the proposed swale, retained grassland (which is very species-poor throughout) would be scarified on rotation to minimise impact on reptiles (see below) and then resown in stages with a locally appropriate species-rich grassland (which includes the semi-parasitic herb species yellow rattle *Rhinanthus minor* to help suppress coarse grasses and promote sward diversity, as well as creation of a range of other habitats, which are wherever possible designed with biodiversity in mind. For example, a species-rich damp-ground grassland mix would be used around and within the attenuation basin, and a species-rich short turf mix would be used in some POS areas to maximise gain as far as practical in zones where regular management is proposed for amenity purposes.

The eastern of the pair of parallel hedges that run along the western boundary would be subject to rotational laying and interplanting with additional native species (e.g., oak, dogwood, holly, and hazel) to diversify species richness and enhance structure.

Other habitat creation in and around the POS area would focus on planting mixed scrub patches with hawthorn and blackthorn as dominant species to provide early flowering species for spring pollinators, establishing a new native hedge along the eastern edge of the site, and constructing a large attenuation basin. Whilst the basin would not retain water throughout the year, it is anticipated that it would remain damp for much of it; this would provide valuable habitat for many invertebrates, whilst remaining consistent in capacity terms with its primary surface-water attenuation function.

A total of ten reptile refugia are proposed in sunny locations within retained (and enhanced) grassland along the western boundary; these would be constructed using local materials (logs and rubble) and covered with subsoil to provide a low-fertility planting substrate before being sown with a species-rich wildflower/grass mix. The refugia would provide shelter and basking sites for reptiles around the site margin post-development.

Table 6-4 summarises the areas and linear lengths (for hedges) of key habitat enhancement and creation measures set out in the Landscape Strategy by MacGregor Smith.

Table 6.2 Headline new and enhanced habitat in redline

Habitat-type	Area (ha)	Length (m)
Retained grassland on west side of field to be enhanced to other Neutral Grassland (from modified poor grassland) following management intervention (scarifying on rotation and sowing in of wildflower mix with yellow rattle).	0.046 ha	-
Around and within the POS area / attenuation basin zone a series of appropriate wildflower mixes would be sown according to the proposed land use; for example damp-ground mix would be sown around the attenuation basin, whilst drier ground mixes aimed at establishing forb-rich areas of Other Neutral Grassland would be appropriate in areas around the basin.	0.245 ha	-
New native mixed scrub habitat around fringes of site in south, west and in POS area.	0.062 ha	-
New trees (mix of native, ornamental and fruiting species)	78 No.	-
Native hedge enhancement by laying: the easternmost of the double hedges on the western edge would be laid on rotation to improve structural diversity and interplanted with native species to provide additional floristic diversity.	-	0.158 km
A formal native beech hedge would be established along much of the eastern boundary as part of the main landscaping proposals.	-	0.038 km

Proprietary seed mixes would be locally appropriate as far as possible, following agreement with the WC ecology team if required; for example, a type such as Emorsgate EM2 (see below) would form the basis for the dry grassland mixes used to enrich the western boundary and be established in places around the POS and on reptile refugia. As previously noted, a key herb in these mixes is yellow rattle, a parasitic forb that reduces competition and facilitates the establishment of wildflowers.

The attenuation basin (which would be excavated in part to attenuate surface water runoff from the nearby development, but also to provide wildlife benefit through the presence of seasonally damp ground) would be planted with a mix such as Emorsgate EP1, with the final mix being subject to agreement with WC if needed, through an agreed LEMP. EP1 contains plant species suitable for sowing at the wet margins of ponds, streams, and ditches and which will withstand periodic inundation.

Residual effects

The residual effect of the proposed development on habitats during the construction phase is assessed as **moderately negative on the** ecological feature of **District value**.

6.3.2 Operational phase

Impacts

During the operational phase, there may be a minor negative effect on new habitats through (for example) dog defecation and local soil enrichment in the new grassland areas in the south and west of the site, as well as potentially through deposition of garden waste (which can contain invasive non-native species) into new native species-rich grassland and other peripheral planting features.

Overall, such effects are likely to be minor and should be offset by positive habitat creation/enhancement outcomes. Operational phase impacts are predicted to be **minor negative to neutral** on a receptor (habitats) of **District value**.

Mitigation

No specific measures are proposed for the operational phase with respect to habitats, other than the regular clearance of tipped garden waste as part of ongoing site maintenance, which would be specified in a LEMP.

Residual effects

Once new habitat creation within the red line has been considered, the residual effect of the proposed development is assessed as **moderate negative** on an ecological feature of **District value**.

6.4 Bats

6.4.1 Construction phase

Impacts

A total of 1.532 ha of species-poor grassland would be permanently lost to the main development hard-standing (buildings and hard surfaces), as well as to gardens and associated infrastructure.

There would be a loss of two sections of species-poor hedge (totalling 8.4m width) on the west side of the site, from the easternmost of the double hedges only, as well as a 17.3m wide section of species-poor young woodland understory (totalling 0.008 ha), which comprises a mix of suckering

elm and a young sycamore, to accommodate the main access road where this enters the site from White Street in the south.

Permanent removal of vegetation within the field is the main negative effect (on small numbers of foraging bats, mainly of widespread and locally abundant species). The only loss of a linear feature that could negatively affect commuting bats is 17 m of the wooded southern edge, which would remain unlit (no artificial lighting is proposed during construction or operation).

Mitigation

In the medium term, losses would be offset to some extent by damp ground/wetland planting in and around the attenuation basin, as well as by new species-rich planting in and around the POS, and enhancement of retained grassland adjacent to the western (double) hedge.

Residual effects

Residual effects on moderate numbers of common species that typically forage in edge / open habitats (such as pipistrelles) would be **temporary, minor negative**, in large part because of the adaptability of such species and their likely strong local populations.

Residual effects during construction resulting from habitat loss would be **temporary, with moderate negative effects** on scarcer species that forage in open-field habitats, such as *Nyctalus*.

Residual effects during construction on moderate numbers of **scarcer species** that typically forage in edge habitats, such as serotine, would be temporary, moderate negative resulting from scrub clearance on the western edge (to accommodate a swale and grassland enhancement), which would alter habitat structure here (but in the longer term increase its species-richness).

Residual effects during construction on low numbers of **common species** that typically forage in closed or edge habitats, such as long-eared bats, would be temporary, moderate negative effects resulting from scrub clearance on the western edge.

Residual impacts during construction on low numbers of **rare species** that typically forage in edge or closed-canopy habitats (such as horseshoe and barbastelle) would be temporary and moderate in magnitude, largely due to scrub clearance on the western edge.

6.4.2 Operational phase

Impacts

The principal concern regarding bats on development sites - over and above the effects of physical loss of foraging habitat to the development - is possible disruption to baseline activity patterns because of artificial lighting spill into boundary features, loss of possible tree bat roosts and physical severance of linear features where these are important for commuting bats.

There would be no loss of significant tree specimens along the southern edge of the site to the access road, since a natural canopy break was selected for the entrance point and all mature/semi-mature trees were avoided during the design stage. The only feature that would be lost here is effectively a woodland understory, which comprises a 20' high sub-shrub canopy of suckering elm and young sycamore. Loss of this 17.3m wide section of young woodland on the southern boundary may have a minor deterrent effect on low numbers of species that prefer not to cross open ground. The baseline bat survey indicated that those species which prefer to fly close to/within cover (i.e. along site edges) rather than over open ground, are restricted to *Myotis* and long-eared bats (almost

certainly the widespread brown long-eared species) since rare species (i.e. barbastelle and both horseshoe bats) were very low in number along this feature¹³.

The proposed two physical canopy breaks (totalling 8.2m) that would cut permanently through the easternmost of the two parallel hedges along the western boundary would not affect closed canopy species, because the westernmost of the two hedges would remain physically intact; continuity would be maintained along this north-south linear corridor during the long term.

Bats can be sensitive to artificial lighting, and control of illumination is key to maintaining populations on and around a site at or close to baseline levels during the operational phase, as the effect of artificial lighting on commuting and feeding bats is well-studied and can be severe for certain light-averse species¹⁴. Bats from the genus *Plecotus*, *Myotis*, *Rhinolophus* and *Barbastellus* are particularly intolerant of lit conditions, whilst commoner species such as pipistrelles (which were the most abundant taxa during baseline surveys) are generalist foragers and relatively light-tolerant (they are often recorded foraging around streetlamps, for example). The western hedge was also used by serotine during baseline surveys; it was one of the noteworthy species recorded in large numbers, but it is not generally considered especially light-averse. Other less common species recorded during baseline surveys were bats from the *Nyctalus* group - these are fast and high-flying species that are highly unlikely to be dependent on this site alone for foraging and are certainly not likely to be dependent on edge habitats for commuting.

Mitigation

In terms of lighting, it is envisaged that no artificial street lighting will be provided on this development, as a matter of good practice to maintain dark skies and benefit nocturnal wildlife.

House layouts have been designed, wherever possible, so that porches and house frontages do not face potential bat commuting habitat (i.e. the western hedge or the southern wooded belt). Front doors would have wall-mounted downward-directed PIR lights, whilst porches would have PIR-based lighting. The lamp specification would be a 2700K warm-white LED with PIR operation, in line with BCT/ILP guidance. Information on LUX spill and detailed lamp specifications is provided in a separate Lighting report by specialist lighting engineers, The Lighting Bee.

There would, of course, be vehicle movement into and around the site during the operational phase, but illumination from headlights is likely to be temporary and brief in the vicinity of the western hedge and southern wooded boundary. Impacts from vehicle lighting briefly passing across edge habitats are expected to be primarily during the shoulder months of the active bat season, since in the main part of the bat season (i.e. May to August), later sunsets would mean most vehicle movement would be during daylight hours when lighting of bat habitat would not be an issue. Whilst impacts on light-averse bats from the passage of car headlights cannot be ruled out completely, the functional effect on local bat populations during the operational phase is likely to be very minor and thus not significant.

¹³ Ecobat analysis indicated that the site was of Low importance for these species.

¹⁴ Light-intolerant bats typically live at lower densities in the landscape and will often completely avoid lit areas; thus, they may need to travel further to reach foraging habitats and roost sites. The resulting increase in energy demands on individuals due to detours can be important for survival at certain times of the year, and it is likely that, under certain circumstances, it can result in local population declines. Other indirect effects of artificial lighting can include reductions in prey availability (for light-intolerant species) as night flying insects are attracted away from dark areas into lit urban areas - especially if these are illuminated by lamps with a high UV component (as these are known to attract many species, in particular moths).

North-south physical connectivity for bats around the site would be maintained along the double hedge that runs along the western boundary, since its integrity would be retained because only one of the two hedges would receive two 4.2m cut-through sections to accommodate two footpaths; these would run from the main site out to the western footpath. There are plans (which would be set out in detail in a LEMP in due course) to lay sections of the easternmost of these two hedges (the westernmost would remain unmanaged to confer permanent structural integrity) and interplant this with native species to broaden its floristic diversity.

Structural vegetation loss (17.3m width) to create the access road is unavoidable. The position of the access point was designed in consultation with several internal technical disciplines to minimise impact on trees and there are none noted within this cut-through or adjacent to it that have any significant potential for bat roosting [there are young trees with light ivy cover on their trunks, but as far as it was possible to tell without removing the vegetation, these specimens are unlikely to be of more than negligible value to roosting bats].

The 17.3m gap in the woodland belt proposed for the access point is not likely to constrain most of the bats that utilise this site from commuting across it during the operational phase. Regarding light-averse species, an alternative commuting habitat is available nearby, on the southern side of White Street, where (mature garden) habitat is fenced/hedged; this would remain dark post-development.

In the medium term, losses of grassland vegetation would be offset to some extent by creation of damp ground/wetland planting in and around the attenuation basin, as well as new species-rich grassland planting in and around the POS, and enrichment of retained grassland adjacent to the western double hedge, together with other measures that would be set out in a LEMP for approval by the LPA in due course. Within the development zone, gardens are expected to provide foraging opportunities for more adaptable commoner species (e.g., pipistrelles).

Residual effects

Residual effects during the operational phase are anticipated as follows:

Permanent minor negative effect on low numbers of widespread / locally abundant species (pipistrelles) of **site importance** resulting from loss of foraging habitat (open species-poor grassland).

Permanent minor negative on small numbers of scarce species of **District** importance (e.g. serotine/noctule / *Myotis*) resulting from foraging habitat loss and possible disruption to commuting, in part because of the passage of car headlamps into edge habitats during the shoulder months of the bat season.

Permanent minor negative on small numbers of rare species of **County** importance (e.g. barbastelle / greater horseshoe / lesser horseshoe) resulting from foraging habitat loss and possible minor disruption to commuting resulting from the periodic passage of car headlamps into edge habitats during the shoulder months of the bat season.

Enhancement

50% of proposed dwellings would have built-in provision for bats, such as tiles, tubes, bricks and boxes mounted within lofts. A separately submitted CG Fry drawing shows the locations of the proposed built-in bat boxes to be installed at eaves height (Schwegler 2FR bat tubes, or similar, are recommended as broadly appropriate, subject to availability).

6.5 Western European hedgehog

6.5.1 *Construction phase*

Impacts

Hedgehogs are present locally and may forage in the grassland. If so, animals would be potentially vulnerable to impacts during construction, if unmitigated. During construction, this would be from excavations that could trap foraging or dispersing hedgehogs.

Mitigation

During construction, mitigation measures would prioritise animal welfare and include covering pits and trenches at the end of each working day or providing hedgehog escape routes (e.g., planks in trenches).

Residual effects

Overall, a **moderate** residual effect on a **District-level feature** is anticipated once proposed mitigation measures are in place, resulting from the unavoidable loss of grassland foraging habitat for this species.

6.5.2 *Operational phase*

Impacts

During the operational phase, impacts are likely to arise from habitat fragmentation (it is difficult or impossible for hedgehogs to move through an enclosed urban landscape) and from the loss of foraging opportunities due to grassland loss.

Mitigation

During the operational phase, best practice (provision of 100mm x 100mm gaps in fences) would enable hedgehogs to move across the site post-development. In addition, gardens would continue to provide suitable invertebrate food for this insectivorous mammal during the operational phase. Provision for hedgehogs within the new urban area would be made by incorporating a network of 100 x 100 mm holes at the base, as shown in a separately submitted CG Fry drawing.

Residual effects

The anticipated residual effect during the operational phase is a **minor negative** on a receptor (hedgehog) of up to **District importance**.

6.6 Badger

6.6.1 *Construction phase*

Whilst there is currently no evidence of badgers in the vicinity of the proposed development, it is possible that this species occasionally forages in the grassland field, although no such evidence was found during the baseline survey. The loss of most of the species-poor grassland to development during the construction phase could remove occasional foraging opportunities for this species.

Mitigation

Open trenches and pit excavations would be covered at night, or, if they must remain uncovered, steep sides would be provided with planks to allow badger egress in the event of accidental entrapment.

Residual effects

There would be no significant residual effects arising during the construction phase.

Operational phase

There would be no additional impacts on badgers during the operational phase, beyond the potential effects of the loss of occasional foraging habitats identified during the construction phase.

Mitigation

Other than the habitat creation and enhancement works already proposed (discussed above) there are no specific mitigation measures proposed for badgers during the operational phase of the development. A further pre-development check would be undertaken as a precaution.

Residual effects

The anticipated residual effect during the operational phase would be **neutral on a receptor (badger) of up to District importance.**

6.7 Birds

6.7.1 Construction phase

Impacts

The principal potential impact on birds is the risk of killing/injuring nestlings and of damaging/destroying nests and eggs during the breeding season between March and the end of August inclusive. Very minor effects are noted associated with the loss of two sections of north-south hedge (8.2m) on the western edge of the site and the loss of a 17.3m wide section of a modest age woodland on the southern boundary, to facilitate the access road. Noise associated with the construction of the initial access route and compound facilities would be temporary.

Open grassland is likely to be used by common species for feeding rather than breeding, and whilst such habitat would be lost, most breeding (in marginal habitats such as hedges and trees) would be unaffected.

Mitigation

The two (8.2m total) sections of hedge on the western boundary and the 17.3m section of tree belt to the south would be removed outside the breeding bird season (March-August). In the unlikely event that this is not possible for operational reasons, removal would be undertaken following a detailed survey of the affected areas by an Ecological Clerk of Works or a suitably experienced ecologist. If bird breeding is detected, the vegetation in the area must be protected until the young birds have fledged.

Enhancement

50% of dwellings would have built-in boxes for birds reliant on buildings (e.g., swifts), and CG Fry's drawing SP-P-XX shows the locations of proposed integral swift-type boxes to be installed internally at eaves level, out of full sun.

Residual effects

A Neutral (not significant) residual effect on a **site-level** feature (birds) is anticipated once proposed mitigation measures are in place.

6.7.2 Operational phase

Impacts

Open grassland habitat is likely to be used by common species for foraging only, and the principal impact of the proposed development is therefore likely to be the loss of edge habitat, as discussed above under construction-phase impacts.

Mitigation

Embedded mitigation, wherever possible, involves retaining boundary habitat and improving its management (e.g., retained hedges on the western edge by laying and interplanting). In addition, creating new habitat and enhancing adjacent habitat (wildflower meadow, damp ground vegetation, scrub creation, and new hedge planting) would provide new nesting and foraging opportunities for birds and help offset potential negative effects associated with the loss of grassland, small sections of hedge, and scrub.

Residual effects

Residual impact during the operational phase would be minor negative on a receptor (birds) of up to site importance (not significant).

6.8 Reptiles (common lizard)

6.8.1 Construction phase

Impacts

A locally noteworthy breeding population of common lizards has been confirmed during the baseline survey, apparently concentrated in the northern half of the site, around the field margins. This species is of conservation concern and is protected from intentional killing or injury under the Wildlife and Countryside Act 1981 (as amended). The population is at high risk of loss during the construction phase if the development proceeds without appropriate mitigation measures.

Mitigation

To conserve a viable breeding population of common lizards on site, a proportionate, site-specific approach that avoids offences, maintains local conservation status, and delivers measurable biodiversity outcomes in line with the mitigation hierarchy (avoid, mitigate, compensate) is required. The strategy outlined below has been prepared to ensure that the proposed development complies with best-practice guidance and applicable legislation relating to reptiles. Key measures are as follows, in italics:

- *Avoid intentional killing or injury of common lizards during site clearance and construction works.*
- *Retain and enhance suitable reptile habitat on retained margins within the red-line boundary.*
- *Maintain a viable breeding population on-site through habitat retention, enhancement, and sensitive construction practices.*
- *Provide long-term management of the retained habitat to sustain the population in the long term.*

- *Habitat Retention: grassland habitats along the edge of the western boundary and along the southern tree belt have been retained, with a minimum of 5 m undeveloped buffer incorporated into the landscaping where feasible. These areas will constitute the core reptile-receptor habitat into which animals will be displaced (see below).*
- *Layout Design: built development has been located away from retained boundary habitats wherever possible. Garden boundaries adjacent to retained habitat will use permeable fencing (e.g. post-and-wire or fences with gaps at ground level) to allow reptile movement into and out of gardens while also maintaining residential privacy.*
- *Timing: Vegetation clearance would be undertaken during the active season (April–September inclusive), avoiding periods of prolonged cold or heavy rainfall.*
- *Toolbox Talk: contractors will receive a reptile awareness briefing covering legal protection, identification, and procedures should reptiles be encountered during the construction phase.*
- *Sensitive Clearance: grassland would be reduced in a two-stage cut; initially to c.150 mm, then to c.50 mm after a minimum of 48 hours, progressing towards retained habitats on the western edge of the site to encourage reptiles to disperse out of the main field. Some trapping and translocation may be needed along the eastern and northern edges of the field, but given the difficulty of capturing lizards, a supervised displacement approach would be preferable.*
- *Supervision: initial clearance within a suitable habitat would be overseen by the ECofW or a suitably qualified ecologist.*
- *Refugia Provision: 40 artificial refugia (e.g. corrugated tins and or roofing felt) will be installed within retained habitat on the western edge of the site prior to clearance, to assist in drawing reptiles away from vegetation stripping areas.*
- *Working Practices: open trenches would be provided with escape ramps (see section on badger). Materials would not be stored within retained habitat buffers (these would be Heras-fenced where required to prevent plant access).*

Through a combination of avoidance, sensitive working methods, habitat retention, and targeted enhancement, the construction phase of the proposed development could proceed without adverse effects on the local common lizard population. The measures set out above represent best practice, are proportionate to the site's scale and context, and ensure compliance with relevant wildlife legislation.

A total of 10 reptile hibernacula and log/brush piles would be created within the western and southern POS zones using site-derived materials wherever possible. Retained grassland margins and new species-rich wildlife grassland would, wherever possible, be managed as a tussocky rough sward with a varied sward height; such habitats would be cut on a rotational basis outside the main reptile active season. Note that over time it is intended to enrich grassland habitats through local scarification and seeding with a wildflower mix; this would be undertaken on rotation to minimise the effect on reptiles, but over time the enhanced grassland would support a higher invertebrate diversity, which is in turn expected to benefit the reptile population. [Nb. Using native scrub and nectar-rich wildflower mixes would increase invertebrate prey availability and structural diversity.]

The above measures would be incorporated into a LEMP, which is envisaged to be approved by the LPA prior to commencement. This would normally run for a minimum of 10 years and be secured through a planning condition. Ongoing management of retained and new habitats would include controlling scrub encroachment, maintaining refugia, and avoiding excessive tidying.

A post-construction compliance check would be undertaken by the ECofW in the first active season following completion to confirm habitat establishment and reptile usage.

6.8.2 **Operational phase**

Impacts

Operational-phase impacts are likely to include a theoretical loss of foraging habitat for the common lizard population, as well as potential predation by cats from the nearby development.

Mitigation

In addition to the precautionary approach to be delivered through the reptile method statement for the construction phase via an experienced ECofW, the following on-site mitigation would be provided for reptiles: construct 10 hibernacula along the western edge (log piles and rubble overtopped with sub-soil and seeded with a species-rich grass and meadow-mix) to provide foraging and shelter for lizards.

Residual effects

Once the above mitigation is implemented, residual effects during the operational phase are anticipated to be minor and negative for a receptor of up to **District importance**.

6.9 Amphibians (great crested newt)

6.9.1 Construction phase

Impacts

Whilst it is theoretically possible that small numbers of great crested newt (as well as other amphibians) from waterbodies within 250m to the east-south-east / south-east could periodically disperse into the proposed development site and thus become vulnerable to killing and injury during vegetation clearance, it should be clarified that this species has not been recorded within 2km of the site, and whilst its presence cannot be discounted entirely, its presence is on balance considered unlikely, since the species is quite widely surveyed nationally and its distribution fairly well documented. Whilst efforts are underway to access the off-site ponds for survey work, the absence of data may make it difficult to obtain a precautionary District licence, and an alternative approach may be needed. Therefore, it is proposed that a precautionary approach to construction is adopted through a risk-based GCN method statement (which would run alongside a similar approach proposed in the section on reptiles, below), in italics as follows:

- *Whilst the risk to individual newts is considered negligible (for the reasons set out above), the mitigation approach set out here follows Reasonable Avoidance Measures (RAMs) advice in the Natural England document 'Guidance for works carried out under great crested newt district level licensing' to obviate as far as possible any impacts on GCN during construction. The following approach would be followed for all on-site works during the construction phase:*
- *A suitably qualified and experienced Ecological Clerk of Works (ECofW) would be appointed prior to site works commencing.*
- *Prior to site works, the ECofW would give the site management team and relevant staff toolbox talks, during which the implications of GCN for construction would be explained, and a requirement for ECofW-supervised working in key areas of the site (the south-east section closest to the two ponds) would be emphasised. The talk would explain how the developer's staff and contractors can identify amphibians that could potentially be found during works, and information for ID purposes would be provided/retained on site if needed for the duration of construction, together with a copy of the method statement, which would include ECofW contact details, phone number and email in case animals are found.*

- *Site-wide works affecting vegetation directly (through clearance) or resulting from routine disturbance and compaction (through vehicle movement, i.e. along regularly used tracks and in working / plant movement zones) would be subject to a phased precautionary cutting/vegetation modification approach in line with Natural England Standing Advice on herpetiles and in line with the guidance document referred to above. Vegetation modification (of grassland) would occur before cutting, between February and October, when herpetofauna are most likely to be active in such habitats. The process would involve two progressively shorter cuts - from around 200mm to a few cm - over a 48-hour period when average night-time temperatures are above 5^o C. The intention underpinning this approach is to displace any amphibians (and reptiles) that might be temporarily sheltering within affected habitat to undisturbed site margins. In line with NE guidance, a second (and third, if deemed required by the ECofW) shorter cut, oriented in a directional manner, would be undertaken, with the cut progressively moving towards suitable areas of retained habitat along the site margin. Cuttings would be removed from the site.*
- *Except in areas where a fingertip search would be undertaken (see below), the physical removal of vegetation and soil could progress no less than 48 hours after the second phase of vegetation clearance - again working towards retained habitat on the western and southern site edge. To minimise impact, soil stripping would normally be restricted to areas where works are shortly to commence. Once a soil strip has been completed, the area will be maintained bare to minimise the likelihood of newts colonising. Vegetation clearance would not be undertaken during prolonged periods of hot, dry weather, as amphibian activity is likely to be reduced.*
- *With grassland turf, the ECofW would work with excavator drivers to safely conduct a fingertip search of turf for sheltering herpetiles, if the ECofW deems this to be needed.*
- *Newts are (if present at all) most likely to be sheltering in sections of hedge or woodland. Therefore, all three sections of hedge fringing the western side of the field and the southern woodland area that need to be removed would be cleared under direct ECofW supervision, following winter (i.e. outside the bird breeding season) removal of woody overtopping vegetation / brash to a height of approximately 200mm. This vegetation clearance would facilitate a fingertip search of the exposed ground layer vegetation when bank sections are completely removed (from February onwards).*
- *Supervision/fingertip searches may need to be extended to other areas of the site depending on perceived risk to herpetiles, and the ECofW would liaise with site managers to determine the scope of any such extensions. Conversely, the ECofW may, depending on the nature and location of each phase of the proposed work, determine that, under certain circumstances, the risk to GCN/herpetiles is sufficiently low to require no specific mitigation. If this is the case, an amendment to the working methodology could be agreed in writing with the site management team.*
- *If GCN are found during work on a particular phase, work in that location would be paused until such time as the ECofW can liaise directly with the Wiltshire Ecology Team and agree a suitable way forward. In the unlikely event that GCN are captured, animals (including other herpetiles) would be released in a secure area offsite to be agreed with the WC ecology team.*
- *Storage of materials/waste would be located on hard-standing or on previously cleared ground, or in areas already subject to progressive cutting as set out above. Waste would be stored, where possible, in skips or removed off-site to avoid creating potential newt refuges. Storage areas, waste material, and site compounds would not be located in the extreme south-east of the development site, as this area is closest to the off-site ponds and thus has the highest potential (though still considered very low) to support sheltering newts.*
- *Mounds of soil would be compacted around their bases to avoid creating crevice-type refuges for newts / herpetiles. Site works would avoid creating temporary water bodies that may attract newts, and excavations would be backfilled as soon as possible (or fitted with wooden*

planks at an angle of no more than 45 ° to allow animals to escape). Excavations would be checked for the presence of newts before infilling.

- *A written and photographic record would be kept of all activities carried out on site by the ECofW under the guidance of this method statement, and a periodic emailed report would be prepared for provision to the developer, site managers and WC.*

Residual effects

Once a risk-based mitigation approach is considered, residual effects during the operational phase are anticipated to be (assuming the species is present locally) **minor negative** on a receptor (great crested newt) of up to **District** importance.

6.9.2 Operational phase

Impacts

Operational phase impacts are likely to be associated with a theoretical loss of foraging habitat for the local GCN population.

Mitigation

In addition to the precautionary approach to be delivered through the GCN method statement for the construction phase via an experienced ECofW, the following on-site mitigation would also be provided: construct 10 hibernacula (comprising log piles and rubble overtopped with sub-soil and then seeded with a species-rich grass and meadow-mix, as described earlier in this document) to provide shelter for amphibians (and reptiles) around the southern and western edges of the site.

Residual effects

Once the above mitigation is implemented, residual effects during the operational phase are expected to be minor negative on a District-level receptor.

6.10 Invertebrates

6.10.1 Construction phase

Impacts

Because of the sites' limited floristic diversity, invertebrate diversity is likely modest and unlikely to support specialist or rare taxa. Therefore, the impact of the loss of the main habitat-type (species-poor grassland) as well as 8.2m of hedge on the western edge and 17.3m wide section of woodland of modest age, as well as sparse blackthorn scrub on the western edge of the site during the construction phase is likely to result in a **minor negative** impact on a receptor of **site importance**.

Mitigation

The section on habitats above sets out proposals for compensatory habitat enhancement / new habitat creation within the red line, which would benefit invertebrates by providing a wider diversity of plants and, consequently, a wider range of nectar sources. As already stated, headline elements will include enhancement via scarification and seeding with a wildflower mix in some areas; establishment of new species-rich grassland and mixed scrub areas, managed on rotation to allow flowering; and construction of an attenuation basin sown with a damp-ground seed mix.

Enhancement

Bee bricks would be installed at a density of two per dwelling in the locations shown in a separately submitted CG Fry drawing.

e.g. <https://www.greenandblue.co.uk/products/bee-brick?variant=25624590680164>.

Residual effects

The loss of most grassland habitat, despite its limited floristic interest, would not be fully offset by the provision of new habitats and improved management of retained habitats, so residual effects during the operational phase are anticipated to be moderate and negative for a receptor of **site importance**.

6.10.2 Operational phase

Impacts

During the operational phase, habitats created or enhanced during construction, as part of the overall habitat mitigation strategy (including the invertebrate-specific enhancement), would continue to mature and develop greater structural complexity.

Mitigation

No additional mitigation is proposed at this stage beyond that delivered during the construction phase.

Residual effects

The structural and floristic (nectar) diversity resulting from the proposed construction-phase mitigation is expected to increase as habitats develop, resulting in a **permanent, minor negative** impact on a receptor of **Site importance**.

6.11 Headline ecological constraints and opportunities

An Ecological Constraints and Opportunities Plan (ECOP) is included at the end of this section, highlighting the key elements discussed in this chapter.

6.12 Monitoring

Two years of protected species monitoring (Years 1 and 3 post-development) would be undertaken to assess the development of new habitat and its implications for fauna mitigation, and to propose remedial work where required. A reptile survey focusing on habitat along the western edge, including reptile refuges and managed grassland stands that provide shelter for these species, would be a key element of this work. It would follow the same 7-visit approach using artificial refuges/mats as per the baseline survey.

Recommendations would be fed back into the management programme through revisions to the LEMP if needed.

Where possible, the uptake of bird and bat boxes and bee bricks would be ascertained.

Nb. Separate BNG monitoring (where possible, combined with the above visits for logistical and cost efficiency) would be undertaken in accordance with statutory requirements for habitats associated with achieving net gain.

Table 6-7 Summary of impacts, mitigation, and residual effects during construction/operation phases

Ecological Feature/importance	Construction phase impacts without mitigation	Operational phase impacts without mitigation	Mitigation measures proposed	Residual impacts once mitigation is considered
Salisbury Plain SPA International	None anticipated.	Impacts already considered in HRA for the international site.	No specific mitigation measures needed.	Permanent neutral, not significant following delivery of management on SPA by LPA.
Habitats: Mainly species-poor grassland District	Habitat loss during the construction phase is principally of the following: Species-poor modified grassland (1.786ha loss). Blackthorn scrub on western edge 0.199ha (cut back to enable creation of enhanced receptor habitat for common lizard) Self-set broadleaved woodland dominated by non-natives 0.008ha Native hedge on western boundary, loss of 8.2m to two footpaths. Nb. Root zone damage from nearby excavation is possible.	Possible minor negative effect on habitats through dog defecation (local soil enrichment) in enhanced and new grassland habitats, and possibly through deposition of garden waste containing invasive non-native species into hedges and peripheral features.	Habitat loss is minimised as far as possible during design; new habitat creation measures include retained grassland enhancement on the western edge; new grassland and native hedge - 300m. Retained woodland to be enhanced through the selective removal of sycamore and restocking with a wider mix of native species, including canopy natives and additional understory stocking with hazel, dogwood, blackthorn, hawthorn and holly. RPZs around trees/shrubs in hedges and along the southern boundary to be Heras fenced as advised by arb consultants.	Permanent moderate significant negative (significant because of the loss of 1.786ha of species-poor grassland).
Bats site (pipistrelles) and District (serotine/noctule)	Loss of foraging habitat to development (in the field); otherwise, structural connectivity around margins is largely retained.	Long-term loss of 1.786ha of field foraging habitat with two breaks in the marginal hedge on the west side of 4m and 4.2m, and 17.3m wide loss of scrubby understory in the south (opportunities for bats commuting east-west along vegetated edges of South Street to continue to do so unimpeded as there are well established gardens immediately south of this narrow lane).	Scheme designed without lighting; floristic enhancement of retained grassland on the western edge and new grassland habitat creation around the attenuation basin. 300m of new hedge on the eastern side. 50% of new dwellings to have integral bat boxes.	Permanent minor negative (not significant).

Hedgehog District	Loss of potential grassland foraging habitat.	Potential habitat fragmentation/loss of foraging habitat.	Retained grassland enhancement and new grassland in redline will help provide invertebrate food resources; provision for hedgehog passage through development via gaps in fences as standard.	Permanent minor negative (not significant).
Badger District	Loss of 1.786ha of grassland (potential foraging) habitat.	Loss of access to potential foraging habitat; the species occurs locally but is not currently known to use the site.	Cover trenches and pits during the construction phase as a precaution. Pre-commencement survey proposed.	Permanent neutral (not significant)
Birds site	Potential damage to nests and eggs (i.e., risk of legal breach) during the construction phase through the removal of hedges/scrub/trees.	Loss of breeding and foraging opportunities due to loss of hedge habitat; loss of grassland foraging habitat.	Hedge/tree/scrub clearance outside the March-August period; if unavoidable, implement a survey beforehand; fit bird boxes to houses as specified; enhanced grassland within the redline and new habitat creation will provide some replacement foraging and new scrub/hedges as a new breeding habitat.	Permanent minor negative (not significant).
Reptiles and amphibians	Possible impact on small numbers of GCN if present (not considered likely) from ground works for main development, two hedge cut-through gaps for footpaths; pond excavation / POS; access road and infrastructure.	None predicted	Precautionary approach to presence of GCN and to breeding population of common lizard; enabling works preceded by progressive cutting in line with NE standing advice; work under RAAMS approach as set out in text above (to be included in LEMP). Provision of hibernacula (x10) on the western edge; ECofW to supervise enabling works.	GCN: Minor negative, not significant (if present). Reptiles: moderate negative (significant due to loss of grassland and development up to northern and eastern boundaries).
Invertebrates	Habitat loss available to invertebrates is over 1.786ha of grassland plus 0.199ha of blackthorn scrub and 0.008ha of modest age woodland dominated by non-native species.	Maturing and new habitats are expected to improve local conditions for invertebrates.	Habitat enhancement inside the red line aimed at creating a more nectar-rich environment; lighting design aims to leave the site as dark as possible; the hedge on the west side is managed by laying a rotation to allow shrubs to flower and provide nectar sources, also to improve structural diversity.	Minor negative (not significant).



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Report Ends

8.0 APPENDICES

8.1.1 Statutory and non-statutory sites within 2km

