



Biodiversity Enhancement and Mitigation Plan V2

Prepared for: Mr Richard Tanner

The Hullavington Arms

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This report has been prepared to set out biodiversity enhancement and mitigation measures. Cotswold Environmental Ltd accept no responsibility or liability for any use that is made of this document other than by the client for the purposes for which it was originally commissioned and prepared.

Methods used to prepare this report, including those carried out in the field followed The Chartered Institute of Ecology and Environmental Management's Code of Professional Conduct.

Report Author:	Tom Charlton MSc MCIEEM MRSB
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Version Control:	V1 - Issued September 2025 V2 - Issued February 2026 REASON: Additional information provided following consultation comments from the Wiltshire Council Biodiversity Officer. Revisions for V2 include the following: - Inclusion of further detail relating to the provision and retention of receptor bat boxes (point 3.19). - Clarification, in line with the Ecological Impact Assessment prepared by Wildwood Ecology Ltd, that two confirmed roosts within Building A will be retained (point 2.6). Taking account of three integrated bat tubes, overall roosting availability will therefore not be reduced, with additional enhancement now provided through provision and retention of two receptor bat box. - Clarification that the previously committed pre-commencement site walkover will also include both internal and external inspection of buildings prior to disturbance (point 3.2).

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1 INTRODUCTION

1.1 This Biodiversity Enhancement and Mitigation Plan has been prepared to set out ecological enhancement and mitigation measures for a residential scheme at Hullavington Arms. The biodiversity enhancement measures set out within this document are considered proportionate in relation to the scale of the development and risks to protected species.

1.2 Cotswold Environmental Ltd were commissioned in September 2025 to produce a Biodiversity Enhancement and Mitigation Plan for a residential scheme at Hullavington Arms, Wiltshire. The development site was granted planning permission through Wiltshire Council in 2024 (Application number: **PL/2024/11332**). A BEP is required to discharge Conditions 15 and 16 relating to ecology, provided in full below:

15) Prior to the commencement of works, including demolition, ground works/excavation, site clearance, vegetation clearance and boundary treatment works, a Precautionary Working Method Statement (PWMS) shall be submitted to the local planning authority for approval in writing. The Plan shall provide details of the avoidance, mitigation and protective measures to be implemented before and during the construction phase. Development shall be carried out in accordance with the approved details.

REASON: To ensure adequate protection and mitigation for ecological receptors prior to and during construction, and that works are undertaken in line with current best practice and industry standards and are supervised by a suitably licensed and competent professional ecological consultant where applicable.

16) Prior to the commencement of any works, including vegetation removal and demolition, details of the number, design and locations of biodiversity mitigation and enhancement measures shall be submitted to the local authority for approval in writing. The approved details shall be implemented before occupation of the final works. This condition will be discharged once photographic evidence of installed features has been submitted to and approved by the local planning authority. These measures will continue to be available for wildlife for the lifetime of the development.

REASON: To provide mitigation and enhancement for biodiversity.

1.3 The National Planning Policy Framework (NPPF) (Dec 2024) sets out the government planning policies for England and how they should be applied. Chapter 15: Conserving and Enhancing the Natural Environment, is of particular relevance to this report as it relates to ecology and biodiversity¹. The

¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf

Government Circular 06/2005, which is referred to by the NPPF, provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system.

2 AIMS AND OBJECTIVES

2.1 Regarding biodiversity onsite, the aims of this document are to:

- to ensure wildlife is suitably protected at all times during works; and,
- to promote the use of the site by bats through installation of bat tubes; and,
- to promote the use of the site by bird species through installation of bird boxes; and,
- to promote permeability of the site for hedgehogs through the creation of holes in boundary fencing adjacent to hedgerows.

Controlling Authority

2.2 The controlling authority is Wiltshire Council.

Management Responsibilities

2.3 The developer and/or contracted management company is responsible for ensuring the funding and implementation of this Biodiversity Enhancement and Mitigation Plan.

2.4 The developer will ensure that any remedial measures proposed are approved by the relevant LPA. Any breaches of the requirements of this plan, or where requirements cannot be met, will be reported to the appointed ECoW by the developer as soon as practicable. Where necessary, the developer will report any failures or amendments to remedial measures to Wiltshire Council following consultation with the appointed ECoW.

Table 1: Schedule of Works for Implementation

Ecological Feature	Timings of Implementation	ECoW required for implementation	Additional Notes
Bat Tubes	Following Construction/ prior to occupation	No	To be checked by ECoW following task completion
Receptor Bat Box	Prior to commencement of works	Yes - associated within bat mitigation licence	To be checked by ECoW following task completion
Bird Boxes	Following Construction/ prior to occupation	No	To be checked by ECoW following task completion

Wildlife-friendly Fencing	Following Construction/ prior to occupation	No	To be checked by ECoW following task completion
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BIODIVERSITY ENHANCEMENT PRESCRIPTIONS

- 2.5 Local planning authorities have an obligation to promote Biodiversity Net Gain where possible. Alternative roost/nesting sites are not required to be installed at the pre-construction phase. As such, the following biodiversity enhance features will be installed following completion of construction works. Integrated enhancement features will be used to ensure that they will remain permanent fixtures onsite. Installation locations are shown in Figure 1.

Bats

- 2.6 Two confirmed roosting locations within Building A were identified by Wildwood Ecology Limited and, as set out within the Ecological Impact Assessment, these areas are not subject to alteration under the approved proposals. These roosting opportunities will therefore be retained in situ. The EclA further confirms that three roosting locations associated with Building B will be affected by the development and therefore require replacement.
- 2.7 Taking account of the two roosts retained within Building A and the three replacement integrated bat features, a minimum of five roosting opportunities will remain available within the site post-development. The development therefore results in no net loss of bat roosting opportunities. In addition, two receptor bat boxes will be installed and retained to provide further roosting resilience and enhancement across the site (see point 3.19).
- 2.8 Integrated bat tubes represent high-quality, permanent roosting features that are built into the structure of the new buildings. Compared with existing gaps beneath tiles and soffits, they provide more secure, weather-resistant and maintenance-free opportunities that will remain available for the lifetime of the development.
- 2.9 One integrated bat tube will be installed upon each dwelling, using Schwegler 1FR Bat Tube (or similar), which is suitable for a variety of bat species including those of the genera *Pipistrellus*, *Myotis* and *Plecotus* species.
- 2.10 The following considerations will be given when selecting the positioning of bat boxes on site:
- The chosen placement is of a robust nature, reducing possibility of the bat tube falling to the ground which could cause damage to the tube, loss of a roost, or disturbance, injury or death to bats.

- Climbing plants must not be allowed to grow up towards the bat tube as this may eventually block entry.
- The surroundings must remain free from obstruction, allowing for a more direct flight path into the bat box.
- The location must safely accessible, should the bat tube need to be repaired, replaced or monitored by bat-licensed personnel.
- Following Bat Conservation Trust guidelines, the bat tube shall be installed a minimum of 4 m above ground and positioned to ensure that it will receive direct sunlight for at least part of day, in a south, east or south-east facing direction. They must not face north or north-east.

2.11 Installed bat roost features must remain in dark locations during the operational phase. No permanent external lighting will be directed towards, or create spill onto, these features or their access points.

Note: Once a bat tube is occupied, it is an offence to disturb any bat when it is roosting, or to kill, injure or handle a bat without the appropriate licence granted by Natural England. If a sick or injured bat is found, the local Wildlife Trust or bat group should be contacted for further advice. If maintenance of the bat boxes is required, a suitably licensed bat worker or local bat group must be consulted.

Example Schwegler 1FR Bat Tube



Example integrated bat tube installation



Birds

2.12 One integrated bird nest box (Schwegler 1HE Brick Box or similar) will be installed upon each new dwelling. For maximum success, the bird boxes will be installed as follows:

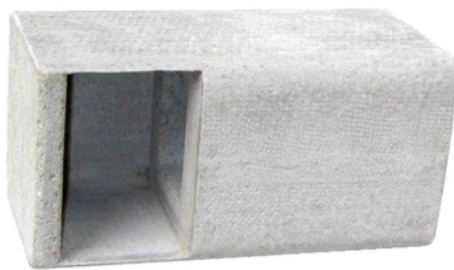
- Following British Ornithology Trust guidelines for mounting bird boxes, they will be positioned no lower than 3 m above ground to offer protection from both ground level disturbance as well as from potential threats.
- The proposed placement of the bird boxes will allow for a clear flight path, without obstruction to the nest box entrance. They shall be installed facing a north or north-easterly direction to offer protection from prevailing winds and rain.

- Further information regarding nest boxes can be found at <https://www.bto.org/how-you-can-help/providing-birds/putting-nest-boxes-birds/make-nest-box>

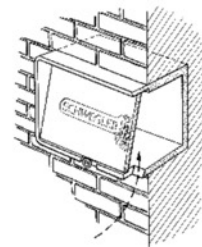
2.13 **Note:** When the nest box is occupied, all common wild birds are protected under The Wildlife and Countryside Act 1981 (and as amended). Under this legislation it is an offence to:

- Kill, injure or take any wild bird
- Take, damage or destroy the nest of any wild bird while it is in use or being built
- Take or destroy the egg of any wild bird

Example Schwegler 1HE Brick Box



Example integrated bird nest box installation



Hedgehog

2.14 Habitats within the site boundary and surrounding environment provide shelter, foraging and commuting opportunities for local hedgehog populations. With hedgehog numbers declining in recent years, biodiversity management plans are critical to aid with their conservation status. Given that foraging hedgehogs can travel through a number of gardens each night in a bid to successfully forage, it is important that provisions are made in each boundary line (if fenced or gated) with a view to allow them to successfully commute. Gaps in fences and under gates must be at least 130mm x 130mm.

2.15 At least one wildlife-friendly fence panel must be located on each linear fence row to provide unimpeded access. Fencing and/or gravel board may be adapted for purpose, or specific wildlife-friendly fencing can be purchased. **Examples of wildlife friendly fencing** (images sourced from www.quercusfencing.com and www.jackson-fencing.co.uk):

Quercus Fencing

Hedgehog friendly oak woven fencing panels



Jacksons-Fencing

Hedgehog friendly gravel board for use with slotted posts



3 Reasonable Avoidance Measures (RAMs)

- 3.1 The following Preconstruction and Construction Mitigation Measures/RAMs are designed to reduce risks to protected species including bats, badger, hedgehog, reptiles, amphibians, and nesting birds by sensitive vegetation clearance, and appropriate site management during the construction phase so as to avoid the creation of potential refuge. These measures are to ensure that protected species are safeguarded at all times during development works. RAMs will be implemented both during site clearance and throughout the construction phase. Where considered necessary, species-specific RAMs are also provided.

Walkover

- 3.2 Immediately before the commencement of works, the nominated Ecological Clerk of Works (ECoW) will carry out an updated site walkover to assess any ecological changes that may have occurred since the previous survey. The walkover will include an internal and external inspection of onsite buildings by a licensed bat ecologist immediately prior to disturbance. **If significant changes are identified between the original survey period and the start of construction, the mitigation measures may need to be revised accordingly.**

Site Induction

- 3.3 Immediately prior to any pre-construction works starting onsite, all site personnel will receive a toolbox talk from the appointed Ecological Clerk of Works (ECoW). This will include, but is not limited to, information pertaining to ecological constraints on site, implementation of biodiversity buffer zones, identification of protected species, and legal protection afforded to protected species as well as safe working methods which must be followed at all times.

Ground Disturbance

- 3.4 Immediately prior to pre-construction works, the appointed ECoW will inspect, and hand search the most likely areas for the presence of protected species. Where present prior to works commencement, clearance of potential refugia, as well as refuse materials must be undertaken carefully and by hand. Once the most likely areas have been cleared it may not be necessary for an ecologist to be on site at all times.

Timings of Work

- 3.5 Vegetation clearance will be restricted to daytime hours where possible to safeguard nocturnal wildlife.

Material Storage

- 3.6 It is advisable that only building products to be used on the day are brought and stored on the site. If building products need to be stored onsite (e.g. overnight or for more than one day), they will be stored on pallets or retained in bags on pallets to ensure that refuges are not created that may attract wildlife.
- 3.7 Any holes created during construction will be filled and completed the same day to avoid leaving potential pitfall traps. If immediate filling is not possible, the holes must have a slightly sloped end or ramp to enable wildlife to escape if they fall in.
- 3.8 Spoil from excavations will be either spread and compacted within the site on the same day or removed from the site that day; it must not be left in loose heaps overnight.
- 3.9 All cut vegetation must be cleared from the development site and its immediate surroundings.
- 3.10 A member of the contracting team will be designated to ensure the above measures are adhered to.

Encountering Protected Species

- 3.11 If a protected species (or a suspected protected species) is encountered at any time before or during construction, all work must stop immediately and the nominated Ecological Clerk of Works (ECoW) must be informed for further guidance. Works in that area will cease and the licensed ecologist will advise on the appropriate course of action in accordance with legislation and any licence requirements.
- 3.12 Contractors are strictly prohibited from handling any protected species found during the development process.

Vegetation Clearance

- 3.13 Vegetation removal required as part of the proposals will be conducted using the following methodology:

- Prior to the start of site works, a licensed ecologist will inspect and hand-search vegetation to be removed for the presence of protected species.
- The ecologist will deliver a 'toolbox talk' to workers, outlining the potential presence of protected species, and will remain on-site during vegetation clearance. Once the highest-risk areas are cleared, the ecologist may not need to stay on-site continuously. If a protected species is found or suspected in the ecologist's absence, the contractor must halt all work and immediately notify the ecologist for further guidance.
- Cleared vegetation will either be spread within the site or removed from the construction area on the same day. Vegetation will not be left in loose piles overnight to prevent wildlife from using it as a refuge.

3.14 Following removal, vegetation must be maintained at a height of 10-15 cm or below both prior to and throughout the development phase

Pre-Construction and Construction Nocturnal Lighting Measures

3.15 As suitable bat habitat occurs within the wider environment, a low-level lighting scheme must be implemented during construction to avoid indirect disturbance to bats and other nocturnal animal species that may exploit local habitats. Measures must be taken to ensure nocturnal animals are safeguarded from inappropriate use of light and noise throughout the hours of night during the construction period, as well as to protect important commuting corridors for bats. Any external lighting installed as part of the development must be used in accordance with Guidance Note 8: Bats and Artificial Lighting 08/23 ².

3.16 Sensitive lighting strategy measures during the construction period are as follows:

- Works must not be carried out after dusk and must not commence until after dawn.
- Generators and machinery that emit significant noise levels must not be left to run after dusk.
- LED lighting sources must be used, which generally have a narrower and more directional beam.
- Light spill must be controlled and if lighting is required at night, hooded shields must be fitted to prevent spill onto nearby habitats that are likely to support wildlife, notably retained trees.
- Lighting must not be directed towards any bat or bird compensation features once installed.

² <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>

SPECIES-SPECIFIC MITIGATION MEASURES

Nesting Birds

- 3.17 Best practice would be for vegetation clearance works to be undertaken outside the bird nesting season, which generally runs from late February to late August. If works begin during the nesting season, the Ecological Clerk of Works (ECoW) must inspect the site, particularly vegetation designated for removal, before any work starts. **No work may proceed until the ecologist confirms that there are no nesting birds within the impact area.** If an active bird nest is found, an exclusion zone of at least 5 meters must be established, and work in that area must be suspended until the nest is inactive and fledglings have left. Confirmation from a qualified ecologist that no nesting birds are present is required before work can begin. Risk Assessment Method Statements (RAMs) must be followed during site clearance and throughout the construction phase.

Summary – Nesting Birds

Species	Timing Constraints	ECoW Required	Other
Nesting Birds	Yes	Yes (Feb-August)	Toolbox talk, pre-works assessment prior to vegetation clearance by ECoW if undertaken between Feb-Aug

Bats

- 3.18 Any removal of roof coverings, soffits, cladding, tiles, boarding or other features at or in the vicinity of confirmed or potential bat roost locations must be undertaken under the supervision of a licensed bat ecologist or their accredited agent. As these works have the potential to disturb or destroy a bat roost, they constitute licensable activities and will be undertaken under a Bat Mitigation Class Licence registered with Natural England and in accordance with its standard conditions. Supervision will continue until the ecologist confirms that the risk of injury or killing of bats has passed.
- 3.19 Prior to works commencing, two receptor bat boxes (Schwegler 1FF or similar) will be installed within the site. As construction activities will affect all buildings, the boxes will be mounted on the only two mature trees present on site, located along the northern extent, or similarly pole mounted adjacent to these trees. The receptor boxes will provide an immediate alternative resting place should bats be encountered or displaced during licensed and supervised works. They will be available for the duration of construction activities and will be retained in situ post-development to provide additional enhancement for bats. Bat boxes will be positioned no lower than 4 m above ground level and will be orientated towards the south, south-east or south-west. The proposed locations are shown in Figure 1 within the Appendices

- 3.20 Given the presence of suitable bat habitat in the surrounding area, a low-level lighting scheme must be implemented to prevent indirect disturbance to bats and other nocturnal wildlife that may use nearby habitats. Measures must be taken to safeguard nocturnal animals from inappropriate light and noise exposure during nighttime hours throughout the construction period and to protect critical bat commuting corridors. Any external lighting installed as part of the development must be used in accordance with Guidance Note 08/23: Bats and Artificial Lighting³. No external lighting will be directed towards, or create spill onto, the existing or installed bat roost features.
- 3.21 When selecting appropriate external lighting, the following specifications should be taken into consideration:
- Any external lighting incorporated into the proposed development should be LED luminaires due to their sharp cut-off, lower intensity, good colour rendition and dimming capability.
 - Luminaires will feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats⁴.
 - All luminaires must lack UV elements when manufactured. Metal halide, fluorescent sources should not be used⁵

Summary - Bats

Species	Timing Constraints	ECoW Required	Other
Bats	No work after dusk/before dawn No further timing constraints associated within day roosts.	Yes - for pre-works inspections and all works affecting confirmed or potential roost features following issue of BMCL	Use of Nocturnal Lighting as per Guidance Note 08/23: Bats and Artificial Lighting.

Badger

- 3.22 A pre-construction walkover will be undertaken by the ECoW to confirm no recent badger activity or evidence of sett building within or in proximity to the zones of impact. If any evidence indicative of recent use of either sett is discovered, **further monitoring effort via use of camera traps will be required to confirm if the setts are in use and to ascertain how the land within the survey boundary and zone of impact is being utilised by the local badger populations.** If impacts to badgers or their setts are determined following extended survey effort, it is likely that a licence would be required from Natural England for works to proceed.

³ <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>

⁴ Stone, E.L. (2013) *Bats and lighting: Overview of current evidence and mitigation*

⁵ Bat Conservation Trust & Institute of Lighting Professionals (ILP) 2023. *Guidance Note 08/23: Bats and artificial lighting in the UK.* Bats and the Built Environment Series.

Summary - Badger

Species	Timing Constraints	ECoW Required	Other
Badger	No	Yes	Updating site walkover by ECoW required prior to vegetation clearance

Hedgehog

- 3.23 Although considered of low risk, vegetation clearance will be undertaken in a cautious manner under the supervision of the appointed ECoW with a view of protecting hedgehog. This will include hand searching potential refugia prior to removal and not creating new habitat with removed vegetation. In the event a hedgehog is found during construction activities, they will be carefully moved by the supervising ECoW to suitable habitat adjacent to the site.

Summary – Hedgehog

Species	Timing Constraints	ECoW Required	Other
Hedgehog	No	Yes	Toolbox talk, supervision of vegetation clearance by ECoW

Reptiles and Amphibians

- 3.24 Although considered of low risk, vegetation clearance will be undertaken in a cautious manner under the supervision of the appointed ECoW with a view of protecting reptiles and amphibians. This will include hand searching potential refugia prior to removal and not creating new habitat with removed vegetation. Vegetation clearance must be undertaken March-October and is subject to suitable weather condition i.e. above 9C, no adverse weather (strong winds or heavy rain).

Summary – Reptiles and Amphibians

Species	Timing Constraints	ECoW Required	Other
Reptiles and Amphibians	Yes	Yes	Toolbox talk, supervision of vegetation clearance by ECoW

Compliance Reporting

- 3.25 Following the completion of the above works, the nominated ecologist will prepare a letter of compliance in relation to this BEP, which will be provided to the developer. A copy of this letter can be provided to Wiltshire Council at their request.

RELEVANT LEGISLATION

The Conservation of Habitats & Species Regulations 2017 (the Habitat Regulations) (as amended)

The Conservation of Habitats and Species Regulations 2017 (as amended) consolidate the Conservation of Habitats and Species Regulations 2010 with subsequent amendments. The Regulations transpose Council Directive 92/43/EEC, on the conservation of natural habitats and of wild fauna and flora (EC Habitats Directive), into national law. They also transpose elements of the EU Wild Birds Directive in England and Wales. The Regulations came into force on 30th November 2017 and extend to England and Wales (including the adjacent territorial sea) and to a limited extent in Scotland (reserved matters) and Northern Ireland (excepted matters). In Scotland, the Habitats Directive is transposed through a combination of the Habitats Regulations 2010 (in relation to reserved matters) and the and the Conservation (Natural Habitats &c.) Regulations 1994. The Conservation (Natural Habitats, &c) Regulations (Northern Ireland) 1995 (as amended) transpose the Habitats Directive in relation to Northern Ireland.



Figure 1: Biodiversity Enhancement and Mitigation Map