

Preliminary Ecological Appraisal and Biodiversity Metric Assessment



Bluemay (Phase 3)
Sells Green
Melksham
Wiltshire
SN12 6RS

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Architect/Agent:			
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1.1 Proposal

It is proposed to construct an industrial unit with associated landscaping and access at Bluemay, Sells Green, Melksham, Wiltshire, SN12 6RS.

1.2 Survey Results

The survey site measured approximately 0.8 ha and consisted of other neutral grassland, modified grassland, developed land; sealed surface in the form of an access road and vehicle parking areas, a pond, native hedgerows and two individual trees. The site provides suitable habitat for amphibians, badger, foraging/dispersing bats, birds, dormouse, hedgehog, invertebrates and reptiles.

1.3 Impacts

It is understood that extents of other neutral grassland and modified grassland will be removed to facilitate the development. In addition, the individual tree T2 will be translocated to elsewhere in the site to facilitate an extension of the existing pond. The western extent of modified grassland (A10) will be enhanced to other neutral grassland.

External and internal lighting will be introduced in association with the development. The proposal has the potential to negatively impact amphibians, badger, foraging/dispersing bats, birds, dormouse, hedgehog, invertebrates and reptiles that may be present on site.

1.4 Further Survey

Further survey has been undertaken for great crested newt in the form of an eDNA survey. At the time of writing, the results are yet to be received. The results of this survey will be required to complete a full ecological impact assessment for the proposal.

1.5 Recommendations

Mitigation, compensation and enhancement measures which are not dependent on the results of the further surveys have been included within Section 6, as these will remain the same irrespective of the further survey results.

1.6 Biodiversity Metric Assessment

The Biodiversity Metric Assessment demonstrates that the proposal will result in an increase of 0.79 (15.95%) area habitat units and 0.23 (223.79%) hedgerow habitat units through the enhancement of modified grassland to other neutral grassland, planting of trees, extension of the existing pond and creation of a native hedgerow with trees. The proposal currently achieves the minimum legal requirement of +10% biodiversity net gain for both area and hedgerow habitats.

1.7 Conclusion

As demonstrated through the Biodiversity Metric Assessment, the proposal currently represents a positive ecological impact to area habitats through the enhancement of modified grassland to other neutral grassland, planting of trees, extension of the existing pond and creation of a native hedgerow with trees. The results of further survey for great crested newt will enable a full assessment of the impacts upon the protected species that have potential to be present on site. Compliance with the Biodiversity Metric Assessment, and implementation of ecological mitigation, compensation and enhancement measures, to be informed by the results of further survey, and implemented through a CEMP, LEMP and/or HMMP, will be required.

2.1 Site Location & Description

The survey site was located within the northeastern extent of Sells Green. The survey site measured approximately 0.8 ha and consisted of other neutral grassland, modified grassland, developed land; sealed surface in the form of an access road and vehicle parking areas, a pond, native hedgerows and two individual trees. The site was immediately surrounded by industrial units and associated hardstanding, agricultural land, grassland and pockets of woodland (Figure 2.1). The wider landscape consisted of agricultural buildings and land, pockets of woodland and dwellings. The Kennet and Avon Canal was located approximately 70 m south of the survey site.

2.2 Proposal

It is proposed to construct an industrial unit with associated landscaping and access at Bluemay, Sells Green, Melksham, Wiltshire, SN12 6RS.

2.3 Survey Objectives

A Preliminary Ecological Appraisal and Biodiversity Metric Assessment were undertaken to consider and assess the perceived ecological impacts associated with the proposal, including any perceived impacts to:

- Legally protected species or species of conservation concern;
- Legally protected habitats or habitats of conservation concern;
- Any statutory or non-statutory sites of conservation interest; and,
- Opportunities to provide biodiversity enhancement(s).



Figure 2.1. The survey site at Bluemay, Sells Green (red outline)

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3.1 Preliminary Ecological Appraisal

3.1.1 Scope of the Assessment

The zone of influence covers the extent of the site, the site boundaries and areas directly adjacent to the site. The assessment considers designated sites, habitats and species of importance for biodiversity conservation and protected species.

3.1.2 Desk Study

A desk study was undertaken reviewing ecological data from the following resources:

- Review of ecological data purchased from Wiltshire & Swindon Biological Records Centre (WSBRC);
- Review of the Government's (DEFRA) mapping website [MAGIC](#); and,
- Review of the Government's [Natural England Open Data Geoportal](#) website.

Review of the ecological data included a search of:

- International & European designated sites (Natura 2000 sites¹) – within the survey area and within 10 km of the survey area boundaries;
- Statutory sites (e.g. Sites of Special Scientific Interest (SSSIs)) within 1 km of the survey area boundaries;
- Non-statutory sites (e.g. Local Wildlife Sites (LWS)) designated for wildlife conservation within a 1 km radius of the site;
- Priority habitats – within the survey area and within 1 km of the survey area boundaries;
- European protected species license (EPSL) records issued by Natural England since 2009 – within the survey area and within 4 km of the survey area boundaries;
- Great crested newt pond survey records within 1 km of the survey area boundaries; and,
- Location of the site within a consultation/risk zone designated for a protected species.

¹ Natura 2000 is a European Union-wide network of nature conservation sites established under the EC Habitats and Birds Directives comprising Special Areas of Conservation (SACs) and Special Protection Areas (SPAs).

3.1.3 Field Survey

The field survey consisted of a walkover assessment of all areas of the site using the UK Habitat Classification System methodology (UKHab Ltd., 2023). This is a standard technique designed for classifying and mapping British habitats. A condition assessment for each habitat was undertaken on site, where applicable, following the Statutory Biodiversity Metric Condition Assessment Methodology (Defra, 2024).

Each habitat was assigned the appropriate alphanumeric code followed by any relevant secondary codes in accordance with UKHab Category Definitions v2.0 (UKHab Ltd., 2023). These codes are shown on the UK Habitat Classification Map (Appendix 1). Apart from buildings, habitat areas below the minimum mappable unit of 25 m² will be denoted by target notes and secondary codes. Target notes are used to indicate specific features, important habitats and/or field signs. An indicative list of observed plant species was compiled with the common name used in the main body of the report, and both the common and scientific names provided within Appendix 2.

The site survey was undertaken on the 13th November 2025 and the 18th February 2026 by Dominic Sheldon. All areas within the site were surveyed and assessed for indicators of ecological value, including the presence or signs of any protected or rare habitats and species.

Great Crested Newt Habitat Suitability Index

A sustainable drainage systems forming non-priority ponds were located within the eastern extent of the site (A8) and within 40 m south of the survey site boundary (A12). An assessment of the ponds suitability to support a breeding population of great crested newts was made according to the criteria of the Great Crested Newt Habitat Suitability Index (HSI) (Oldham *et al.*, 2000) following the methodology described in the ARG UK Guidance Note 5 (ARG UK, 2010). The score translates into breeding habitat suitability for great crested newt (Table 3.1).

Table 3.1. Scoring System for GCN Habitat Suitability Index

HSI Score	Suitability for breeding GCN
<0.5	Poor
0.5 – 0.59	Below average
0.6 – 0.69	Average
0.7 – 0.79	Good
> 0.8	Excellent

3.2 Great Crested Newt eDNA Survey

Two ponds (A8 & A12) were sampled for eDNA of great crested newt. This method involved taking water samples from the water body within Natural England's accepted sampling period of 15th April to 30th June, following the methodology described in the Defra Report WC1067 (Biggs *et al.*, 2014a) and the subsequent Technical Advice Note (Biggs *et al.*, 2014b).

Twenty 30 ml water samples were taken from the standing water on the 15th April 2026 by Julian Prow and Rachel Spencer using sterile field equipment supplied by Surescreen Scientifics. Sample locations were selected based on accessibility and suitable great crested newt egg-laying and displaying areas, with as much of the pond margin being sampled as possible. The surveyors wore sterile gloves whilst taking the sample and did not enter the water. The water column was mixed gently before taking the sample, with care taken not to disturb the sediment at the bottom of the pond. The samples from the waterbody were mixed, and 15 ml aliquots were added to six sterile tubes containing 35 ml ethanol.

3.3 Statutory Biodiversity Metric Assessment

As recommended by the Defra Statutory Biodiversity Metric (2024), the habitat types were defined using the UK Habitat Classification System 2.0 (2023). For each site habitat feature, the metric records:

- Habitat type;
- Area or length;
- Distinctiveness;
- Strategic significance; and,
- Connectivity.

From the recorded parameters the metric calculates:

- 'Habitat units' for area habitats (e.g. grassland, woodland etc.);
- 'Hedgerow units' for hedges and lines of trees; and,
- 'Watercourse units' for rivers and streams.

The habitat values assigned to created and enhanced habitats include factors associated with 'risk' relating to the difficulty and/or time required to establish the new habitat type.

The following were used for the calculation of the parameters, pre- and post-development:

- The site visits undertaken on the 13th November 2025 and the 18th February 2026;
- Desk study results (Section 4.1); and,
- Proposed site layout.

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4.1 Desk study

4.1.1 Statutory Designated Sites

Internationally Designated Sites of Nature Conservation

The desk study did not identify any statutory sites designated for nature conservation of international importance within 10 km of the site.

Nationally Designated Sites of Nature Conservation

The desk study did not identify any statutory sites of nature conservation of national importance within 1 km of the site.

4.1.2 Non-Statutory Designated Sites

The desk study identified one non-statutory sites of nature conservation within 1 km of the site. Kennet & Avon Canal Local Wildlife Site (LWS) was located approximately 70 m to the south of the survey site and is designated for the presence of priority habitats including lowland deciduous woodland.

4.1.3 Priority Habitats

The desk study identified two priority habitats within 1 km of the site including traditional orchard and deciduous woodland. The nearest of these was a 0.63 ha area of deciduous woodland was located 95 m southeast of the survey site.

4.1.4 European Protected Species Licences (EPSLs)

The desk study identified six EPSLs granted for bats within 4 km of the survey site (Table 4.1).

Table 4.1. EPSLs granted for bats within 4 km of the survey site

Species	Location in reference to site	Year granted	Licence type
Soprano pipistrelle	Located approximately 1.6 km east	2019	Destruction of a resting place
Common pipistrelle, lesser horseshoe and soprano pipistrelle	Located approximately 2.3 km northeast	2020	Destruction of a resting place

Table 4.1. EPSLs granted for bats within 4 km of the survey site

Species	Location in reference to site	Year granted	Licence type
Common pipistrelle	Located approximately 3.3 km west	2015	Destruction of a resting place
Brown long-eared and common pipistrelle	Located approximately 3.3 km southeast	2016	Destruction of a resting place
Brown long-eared, common pipistrelle, serotine and whiskered bat	Located approximately 3.4 km northwest	2019	Destruction of a breeding place
Brown long-eared	Located approximately 3.8 km northwest	2015	Destruction of a resting place

4.1.5 Great Crested Newt Survey Records

The desk study did not identify any great crested newt records or class survey licence returns within 4 km of the site. However, ecological data from WSBRC revealed three records of great crested newt within 1 km of the survey site. The most recent of these was a record from 2010, located 400 m northwest of the survey site.

4.2 Field Survey

The environmental conditions for the field surveys are provided in Table 4.2.

Table 4.2. Environmental conditions during the field surveys

Date	Temperature (°C)	Wind Speed (Beaufort Scale)	Cloud cover (%)	Precipitation	Sunset time
13/11/2025	13	2	10	None	N/A
18/02/2026	4	3	100	None	N/A

Constraints on the survey:

The Preliminary Ecological Appraisal records the plants species present at the time of the survey; therefore, plants that appear during different times of the year may not be recorded. Botanical diversity was considered sufficient to classify and assess the habitats present.

4.2.1 Habitats

The survey site consisted of other neutral grassland (g3c), modified grassland (g4), developed land, sealed surface (u1b6), a non-priority pond (r1g), native hedgerows (h2a) and two individual trees. A UK Habitat map for the site is provided in Appendix 1. Each habitat was assigned the appropriate alphanumeric code in accordance with UKHab Category Definitions v2.0 (UKHab Ltd., 2023).

Other Neutral Grassland – A1, A2, A3, A6 & A7 (g3c)

Parcel A1

Parcel A1 was located within the northern extent of the site and supported a short 6 cm sward with 18 species per m² (Figures 4.1 & 4.2). Species identified within A1 included cock's-foot, tufted hair-grass, dove's-foot crane's-bill, selfheal, creeping cinquefoil, bitter vetch, glaucous sedge, a fescue sp., bird's-foot trefoil, common vetch, hawthorn, yarrow, creeping buttercup, common ragwort, bramble, red clover, pendulous sedge, ribwort plantain, common fleabane, white clover, imperforate St. John's wort, ivy, wood-sedge and common dandelion, as well as unidentified waxcap fungi. Badger paths were identified throughout the grassland. The other neutral grassland within A1 was in good condition, supporting a good diversity of floristic species and lack of invasive, non-native species.



Figure 4.1. Parcel A1, photo taken facing south



Figure 4.2. Parcel A1, photo taken facing west

Parcel A2

Parcel A2 was located immediately south of A1 and consisted of other neutral grassland upon a steep-sloping bank (Figure 4.3). Small earth slips were identified across the bank. A2 supported a varied sward, with 17 species per m². Species identified within A2 included common ragwort, fescue sp., common fleabane, tufted vetch, common cat's-ear, common dandelion, bird's-foot trefoil, dog rose, cow parsley, creeping cinquefoil, hemp agrimony, creeping bent, hawthorn, ribwort plantain, carnation sedge, selfheal, common knapweed, common melilot and Guernsey fleabane. Parcel A2 was in moderate condition with a good species diversity and varied sward structure.

Parcel A3

Parcel A3 was located centrally within the site, immediately south of Parcel A2. A3 supported a short sward measuring approximately 5 cm and 9 species per m² (Figure 4.4). The grassland was damp and dominated by glaucous sedge. Other species identified within A3 included cock's-foot, fescue sp., bird's-foot trefoil, creeping cinquefoil, ribwort plantain, red clover, common dandelion, white clover, tufted hair-grass and hard rush. Parcel A3 was in moderate condition with good species diversity but lack of sward height variation and presence of non-native species.



Figure 4.3. Parcel A2, photo taken facing west



Figure 4.4. Parcel A3, photo taken facing east

Parcel A6

Parcel A6 was located within the eastern extent of the site and consisted of other neutral grassland with tall forbs present (Figure 4.5). A6 supported a varied sward measuring approximately 10 – 60 cm with 10 species per m². Species identified included common nettle, horsetail, crack willow, hemp agrimony, greater willowherb, broad-leaved dock, creeping cinquefoil, wild parsnip, ground ivy, cock's-foot, dog rose and bramble. Parcel A6 was in moderate condition supporting a good species diversity but also comprised a small number of species of suboptimal condition.

Parcel A7

Parcel A7 was located within the southeastern extent of the site, supporting a short, uniform sward measuring approximately 5 cm with 16 species per m² (Figure 4.6). Species identified within A7 included cock's-foot, Yorkshire-fog, selfheal, dove's-foot crane's-bill, bird's-foot trefoil, common daisy, ribwort plantain, carnation sedge, yarrow, creeping cinquefoil, fescue sp., autumn hawkbit, rough hawkbit, white clover, perennial rye-grass, sweet vernal grass, tufted hair-grass, germander speedwell and spotted medick. Parcel A7 was in good condition, with a good species diversity and lack of invasive, non-native species.



Figure 4.5. Northwestern extent of parcel A6



Figure 4.6. Vegetation composition within A7

Modified Grassland – A4 & A10

Parcel A4

Parcel A4 was located centrally within the site, immediately south of parcel A3 and consisted of modified grassland. A4 supported a short-mown sward of approximately 5 cm and 6 species per m² (Figure 4.7). Species identified within A4 included perennial rye-grass, dove's-foot crane's-bill, tufted hair-grass, white clover, cock's-foot and common daisy. Parcel A4 was in moderate condition with a good species diversity for its habitat type but lacked a varied sward.

Parcel A10

Parcel A10 was located within the western extent of the site and consisted of a large area of modified grassland. A10 was managed through frequent mowing and supported a sward height of 10 cm and 7 species per m² (Figures 4.8 & 4.9). Species identified within A10 included fescue, cock's-foot, perennial rye-grass, moss, white clover, creeping buttercup, dove's-foot crane's-bill, lesser celandine, common cat's-ear and common ragwort. The modified grassland within A10 was in good condition with a good species diversity and an absence of anthropogenic damage.

Developed Land; Sealed Surface – A5, A9

Ares of hardstanding in the form of site access, a footpath and vehicle parking spaces were identified throughout the site (A5; Figure 4.10). A small electrical substation was identified within the eastern extent of the site, bordering parcels A6 & A7 (A9).



Figure 4.7. Modified grassland within parcel A4



Figure 4.8. Eastern extent of parcel A10



Figure 4.9. Southern extent of parcel A10



Figure 4.10. Southeastern extent of the site showing hardstanding & site access

Pond – A8

Parcel A8 consisted of a non-priority pond located within the southeastern extent of the site and measured 125 m² (Figures 4.11 & 4.12). Species identified in association with the pond included greater horsetail, common fleabane, hard rush, hemp agrimony, reed mace, blanketweed, and goat willow. A duck house was present within the centre of the pond. The pond was in moderate condition with good water quality and lack of invasive species but was connected to artificial pipework.



Figure 4.11. Southern elevation of A8



Figure 4.12. Eastern elevation of A8

Native Hedgerows – H1 & H2

Hedgerows H1 and H2 were located along the southeastern boundary of the site and measured 1.5 m in height, 1 m in width and 29 m & 22 m in length respectively (Figures 4.13 & 4.14). Species identified within H1 and H2 included hawthorn, bramble, field horsetail, greater horsetail, dog rose, Japanese rose (Schedule 9 listed invasive non-native - Target Note 1; Appendix 1), blackthorn and black bryony. Hedgerows H1 and H2 were in poor condition due to being of undesirable width and height, as well as presence of invasive non-native species.



Figure 4.13. Northwestern elevation of H1



Figure 4.14. Southwestern extent of H2

Individual Trees

Two individual trees were located within the southeastern extent of the site within parcel A7. T1 was a very small sized immature Chinese birch, measuring 4 m in height with a DBH of 65 mm (Figure 4.15). T2 was a small sized immature Norway maple, measuring 5 m in height, with a DBH of 95 mm (Figure 4.16).



Figure 4.15. T1 – Chinese birch



Figure 4.16. T2 – Norway maple

4.2.2 Off-site Habitats

Parcel A12 consisted of a non-priority pond formed by a sustainable drainage system located within 40 m of the southern site boundary and measured approximately 35m² (Figures 4.17 & 4.18). Species identified in association with the pond were similar to those found within A8.



Figure 4.17. Pond A12, located off-site



Figure 4.18. Water level and vegetation within pond A12

4.3 Protected and Priority Species

4.3.1 Amphibians

The other neutral grassland (areas with varied sward), pond and hedgerow bases provide suitable terrestrial and/or aquatic breeding habitat for amphibians. If allowed to grow, areas of other neutral grassland and modified grassland (currently maintained with a short sward) provide additional terrestrial habitat for amphibians.

Great Crested Newt

The ponds identified onsite and within close proximity to the site boundary were assessed for its suitability to support great crested newt. The HSI was undertaken on the 13th November 2025 and the 18th February 2026 by Dominic Sheldon. The HSI scores for each category are outlined within Table 4.3. The ponds resulted in scores of 0.63 and 0.58, which equates to 'average' and 'below average' suitability for breeding populations of great crested newt.

Table 4.3. Habitat Suitability Index scores for the on-site and off-site ponds

Parameter	Result		Score	
	Pond A8	Pond A12	Pond A8	Pond A12
Geographic Location	Zone A	Zone A	1	1
Pond Area	125 m ²	35 m ²	0.25	0.07
Permanence	Never dries	Never dries	0.9	0.9
Water Quality	Moderate	Moderate	0.67	0.67
Shade	0%	30%	1	1
Waterfowl	Absent	Absent	1	1
Fish	Possible	Absent	0.67	1
Pond Count per km ²	8	8	1	1
Terrestrial Habitat	Poor	Poor	0.33	0.33
Macrophytes	0%	0%	0.3	0.3
HSI Result			0.63	0.58

4.3.2 Badger

The field survey identified badger paths (parcels A1 and A2) and droppings (parcel A4). The other neutral grassland, modified grassland, pond edges and hedgerow bases provide confirmed and/or possible foraging and dispersal habitat for badger.

4.3.3 Bats

Roosting

There were no potential roosting features identified in association with the individual trees.

Foraging & Dispersal

The other neutral grassland, modified grassland, pond, hedgerows and individual trees provide foraging and dispersal habitat for bats in conjunction with the wider landscape.

4.3.4 Birds

The other neutral grassland, modified grassland, pond, hedgerows and individual trees, provide foraging and/or nesting habitat for bird species. There were no active or former bird nesting sites identified on site.

4.3.5 Dormouse

Due to the current management regime, the hedgerows were considered to be of low suitability for dormice, providing a limited extent of habitat and isolated within a developed area overall.

4.3.6 Hedgehog

The other neutral grassland, modified grassland, pond edges and hedgerow bases provide foraging and dispersal habitat for hedgehog.

4.3.7 Invertebrates

The other neutral grassland, modified grassland, pond, hedgerows and individual trees provide habitat for a range of invertebrate species.

4.3.8 Reptiles

The other neutral grassland (areas with varied sward), pond edges and hedgerow bases provide suitable habitat for reptiles. If allowed to grow, areas of other neutral grassland and modified grassland (currently maintained with a short sward) provide additional habitat for reptiles.

4.4 Invasive and Non-Native Species (INNS)

Japanese rose was identified within hedgerow H1 (Target Note 1; Appendix 1). Japanese rose is listed under Schedule 9 to the Wildlife and Countryside Act 1981. As such, it is an offence to plant or otherwise allow this species to grow in the wild.

4.5 Great Crested Newt eDNA Survey

Two ponds (A8 & A12) were sampled for eDNA of great crested newt on the 15th April 2026 by Julian Prow and Rachel Spencer. At the time of writing, the results of the sample analysis are yet to be received.

4.6 Biodiversity Metric Assessment

The Biodiversity Metric Assessment demonstrates that the proposal will result in an increase of 0.79 (15.95%) area habitat units and 0.23 (223.79%) hedgerow habitat units through the enhancement of modified grassland to other neutral grassland, planting of trees, extension of the existing pond and creation of a native hedgerow with trees.

The strategic significance of each habitat present on site has been assigned through consideration of the Local Nature Recovery Strategy (LNRS) for Wiltshire and Swindon. The guidance states that creation of specific habitat types within areas designated for nature improvement within the LNRS are considered as 'high' strategic significance. In this instance, the site is located within an area designated to "Create and Improve Habitats for Nature on Our Doorstep (NOD)", forming areas to "improve biodiversity near to where people live". Accordingly, created habitats including the extended pond, other neutral grassland, individual trees and native hedgerows with trees are considered to be of 'high' strategic significance as these habitats are considered to increase biodiversity at a local level.

The baseline and proposed habitats including habitat distinctiveness, condition, strategic significance, and biodiversity units are presented in Table 4.4 and biodiversity unit change is summarised in Table 4.5 and 4.6. The baseline and proposed maps are presented in Appendix 3.

Table 4.4. Number of Biodiversity Units for Area and Hedgerow Habitats at Baseline

Map Ref	Habitat Type	Area (ha)/ Length (km)	Habitat Distinctiveness	Habitat Condition	Strategic Significance	Baseline Biodiversity Units
A1, A7	Other Neutral Grassland	0.1514	Medium	Good	Low	1.82
A2, A3, A6	Other Neutral Grassland	0.0905	Medium	Moderate	Low	0.72
A4	Modified Grassland	0.0853	Low	Moderate	Low	0.34
A10	Modified Grassland	0.3172	Low	Good	Low	1.90
A5, A9	Developed Land; Sealed Surface	0.1487	V. Low	N/A	Low	0.00
A8	Pond (Non-priority)	0.0124	Medium	Moderate	Low	0.10
T1, T2	Individual Tree	0.0081	Medium	Moderate	Low	0.07
Total Area Habitat Biodiversity Units						4.95
H1, H2	Native Hedgerow	0.0511	Low	Poor	Low	0.10
Total Hedgerow Habitat Biodiversity Units						0.10

Table 4.5. Area Habitat Biodiversity Unit Change Summary

Biodiversity Unit Type	Description		Biodiversity Units
Area Habitat	On-site baseline habitat biodiversity units		4.95
	On-site habitat retention, creation, and enhancement biodiversity units:		
	Retained	0.1024 ha other neutral grassland in good condition 0.0245 ha other neutral grassland in moderate condition 0.0192 ha modified grassland in good condition 0.0124 ha pond (non-priority) in moderate condition 0.1123 ha developed land; sealed surface 1 small sized individual tree	1.67
	Created	0.0238 ha modified grassland in moderate condition 0.0063 ha modified grassland in poor condition 0.0331 ha other neutral grassland in moderate condition 0.0059 ha pond (non-priority) in moderate condition 0.1587 ha developed land; sealed surface 0.0052 ha artificial unvegetated unsealed surface 0.0037 ha introduced shrub 28 individual small-sized trees in moderate condition	0.81
	Enhanced	0.298 ha modified grassland in good condition to other neutral grassland in good condition	3.26
Overall Net Unit Change			+0.79
Overall On-site Net % Change			+15.95%
Trading Rules Satisfied			Yes

Table 4.5. Hedgerow Habitat Biodiversity Unit Change Summary

Biodiversity Unit Type	Description		Biodiversity Units
Hedgerow Habitat	On-site baseline habitat biodiversity units		0.10
	On-site habitat retention, creation, and enhancement biodiversity units:		
	Retained	0.0511 km native hedgerow in poor condition	0.10
	Created	0.0355 km native hedgerow with trees in moderate condition	0.23
Overall Net Unit Change			0.23
Overall On-site Net % Change			+223.79%
Trading Rules Satisfied			Yes

5.1 Proposed Development

It is proposed to construct an industrial unit with associated landscaping and access at Bluemay, Sells Green, Melksham, Wiltshire, SN12 6RS.

5.1.1 Ecological Impacts

It is understood that extents of other neutral grassland and modified grassland will be removed to facilitate the development. In addition, individual tree T2 will be translocated to facilitate an extension of the existing pond. External and internal lighting will be introduced in association with the development. The western extent of modified grassland (A10) will be enhanced to other neutral grassland.

5.2 Desk study

5.2.1 Statutory Designated Sites

Internationally Designated Sites of Nature Conservation

The desk study did not identify any statutory sites designated for nature conservation of international importance within 10 km of the site.

Nationally Designated Sites of Nature Conservation

The desk study did not identify any statutory sites of nature conservation of national importance within 1 km of the site.

Due to the nature of the proposed works and the absence of nearby statutory sites, it is considered that there will be no direct or indirect impacts upon these sites.

5.2.2 Non-Statutory Designated Sites

The desk study identified one non-statutory sites of nature conservation within 1 km of the site. Kennet & Avon Canal Local Wildlife Site (LWS) was located approximately 70 m south of the survey site.

Due to the nature of the proposed works and intervening distance between the development site and the identified LWS, it is considered that there will be no direct or indirect impacts upon the identified site.

5.2.3 Priority Habitats

The desk study identified two priority habitats within 1 km of the site including traditional orchard and deciduous woodland. The nearest of these was a 0.63 ha area of deciduous woodland was located approximately 95 m southeast of the survey site.

Due to the nature of the proposed works and the intervening distances between the site and the identified priority habitats, it is considered that there will be no direct or indirect impacts upon these habitats.

5.3 Protected & Priority Species Assessment

5.3.1 Amphibians

The other neutral grassland (areas with varied sward), pond and hedgerow bases provide suitable terrestrial and/or aquatic breeding habitat for amphibians. If allowed to grow, areas of other neutral grassland and modified grassland (currently maintained with a short sward) provide additional terrestrial habitat for amphibians. Thirty-one ponds were identified during the desk study, the nearest of which was located 120 m north of the survey site.

Great Crested Newt

The desk study did not identify any great crested newt records or class survey licence returns within 4 km of the site. However, ecological data from WSBRC revealed three records of great crested newt within 1 km of the survey site. The most recent of these was a record from 2010, located 400 m northwest of the survey site.

The presence of great crested newt is typically associated with the presence of ponds, which form aquatic breeding habitat, and therefore tend to have relatively 'localised' distributions.

The HSIs completed for the ponds resulted in 'average' and 'below average' suitability to support breeding populations of great crested newt. Due to the proximity of nearby records and suitability of habitats on-site supporting terrestrial and breeding habitat for great crested newt, further survey in the form of a presence/absence survey using eDNA from the pond has been undertaken to assess whether great crested newt are present on-site. At the time of writing, the results of the sample analysis are yet to be received. Specific mitigation and/or compensation for great crested newt is to be decided upon receipt of the results.

Common Amphibians

Common amphibians such as common frog, common toad, smooth newt and palmate newt, are less dependent on established ponds and have a widespread distribution.

Common toad is listed within Section 41 of the Natural Environment and Rural Communities Act (NERC, 2006) and must be considered through the planning process. Public bodies, including LPAs, are minded to ensure due regard to the conservation of biodiversity of such species. Such considerations may seek to protect, re-establish or create habitat suitable for amphibian's post development.

It is understood that extents of other neutral grassland and modified grassland will be removed to facilitate the development and the pond will be temporarily disturbed which will remove habitat for common amphibians. Accordingly, precautionary measures are provided in Section 6 to ensure common amphibians are not harmed during the development.

5.3.2 Badger

The field survey identified badger paths (parcels A1 and A2) and droppings (parcel A4). The other neutral grassland, modified grassland, pond edges and hedgerow bases provide confirmed and/or possible foraging and dispersal habitat for badger.

Badgers are protected by the Protection of Badgers Act 1992 and the Wildlife and Countryside Act 1981 (as amended), Schedule 6. Under the Wildlife and Countryside Act, it is illegal to intentionally kill, capture, injure or ill-treat any badger.

Precautionary mitigation measures should be employed to ensure badgers are not harmed or injured during the construction period of the development. These measures are detailed within Section 6.

5.3.3 Bats

The desk study identified six EPSLs granted for bats within 4 km of the survey site. The nearest of these was granted for the destruction of a resting place for soprano pipistrelle in 2019 located 1.6 km east of the survey site.

Roosting

There were no potential roosting features identified in association with the individual trees.

Foraging & Dispersal

The other neutral grassland, modified grassland, pond, hedgerows and individual trees provide foraging and dispersal habitat for bats in conjunction with the wider landscape.

As a signatory to the Bonn Convention (Agreement on the Conservation of Bats in Europe) the UK has committed to protecting bat habitats, which necessitates the identification and protection from damage or disturbance of foraging areas and commuting routes.

It is understood that extents of other neutral grassland and modified grassland will be removed to facilitate the development and external and internal lighting will be introduced. Accordingly, mitigation and compensation measures including the implementation of a sensitive lighting plan to avoid illuminating retained on-site habitats. These measures are detailed within Section 6.

5.3.4 Birds

The other neutral grassland, modified grassland, pond, hedgerows and individual trees, provide foraging and/or nesting habitat for bird species. There were no active or former bird nesting sites identified on site.

All birds, their nests and eggs are protected under the Wildlife and Countryside Act 1981 (as amended).

It is understood that extents of other neutral grassland and modified grassland will be removed to facilitate the development, which will remove foraging habitat for bird species. Accordingly, precautionary and enhancement measures are provided in Section 6 to ensure that birds and their nests are not disturbed or damaged during the proposed works and that opportunities for nesting birds are increased following the development.

5.3.5 Dormouse

Due to the current management regime, the hedgerows were considered to be of low suitability for dormice, providing a limited extent of habitat. The desk study did not identify any EPSLs with 4 km of the site, or records of dormouse within 1 km of the site.

Dormice are protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and Schedule 2 of the Conservation of Habitats and Species Regulations 2010. This makes it illegal to:

- intentionally kill, injure, take, possess, sell or disturb a dormouse; and,
- intentionally or recklessly damage, destroy or obstruct their place of shelter or protection (i.e. dormouse habitat).

It is understood that the hedgerows will be retained, but external and internal lighting will be introduced as part of the development. Therefore, mitigation measures including a sensitive lighting plan will be required to ensure that any dormouse present are not negatively impacted by the development. Details of the required mitigation are outlined within Section 6.2.

5.3.6 Hedgehog

The other neutral grassland, modified grassland, pond edges and hedgerow bases provide foraging and dispersal habitat for hedgehog.

Hedgehog are listed as a species of principal importance under Section 41 of the Natural Environment and Rural Communities Act (2006) with public bodies, including LPAs, minded to ensure due regard to the conservation of biodiversity of such species. Such considerations may seek to protect, re-establish or create habitat suitable for hedgehog post development.

It is understood that extents of other neutral grassland and modified grassland will be removed to facilitate the development and external and internal lighting will be introduced as part of the development which will remove habitat and impact the foraging and dispersal behaviour for hedgehog. Mitigation and compensation measures are provided in Section 6 to ensure hedgehog are not negatively impacted by the development.

5.3.7 Invertebrates

The other neutral grassland, modified grassland, pond, hedgerows and individual trees provide habitat for a range of invertebrate species.

It is understood that extents of other neutral grassland and modified grassland will be removed to facilitate the development, which will remove habitat for invertebrate

species. Measures including habitat creation will be incorporated to ensure opportunities for invertebrate species are available post development.

5.3.8 Reptiles

The other neutral grassland (areas with varied sward), pond edges and hedgerow bases provide suitable habitat for reptiles. If allowed to grow, areas of other neutral grassland and modified grassland (currently maintained with a short sward) provide additional habitat for reptiles.

Reptiles are protected against intentional killing and injury under the Wildlife and Countryside Act 1981 (as amended). Natural England states that activities such as site investigations and movements of machinery may breach this legislation by causing death or injury to reptiles (English Nature, 2004).

It is understood that extents of other neutral grassland and modified grassland will be removed to facilitate the development, which will remove habitat for reptiles. Accordingly, mitigation and compensation measures are provided within Section 6 to ensure reptiles are not harmed or injured during the works.

5.4 INNS Management

The field survey identified Japanese rose within hedgerow H1 (Target Note 1; Appendix 1). Japanese rose is listed under Schedule 9 to the Wildlife and Countryside Act 1981. As such, it is an offence to plant or otherwise allow this species to grow in the wild.

Management and monitoring measures including the removal of this species are outlined in Section 6 to ensure this species does not persist or spread within the site or outside the site boundaries.

5.5 Biodiversity Metric Assessment

The Biodiversity Metric Assessment demonstrates that the proposal will result in an increase of 0.79 (15.95%) area habitat units and 0.23 (223.79%) hedgerow habitat units through the enhancement of modified grassland to other neutral grassland, planting of trees, extension of the existing pond and creation of a native hedgerow with trees. The proposal currently achieves the minimum legal requirement of +10% biodiversity net gain for both area and hedgerow habitats.

6.1 Ecological Impacts

It is understood that extents of other neutral grassland and modified grassland will be removed to facilitate the development. In addition, individual tree T2 will be translocated to facilitate an extension of the existing pond. External and internal lighting will be introduced in association with the development. The proposal will therefore remove habitat for, and/or potentially negatively impact amphibians, badger, foraging/dispersing bats, birds, dormouse, hedgehog, invertebrates and reptiles that may be present on site.

6.1.1 Further Survey

Further surveys are aimed at specifically identifying the species present and assess the extent to which the site is being utilised for feeding, nesting, dispersing etc. by the relevant species. The impacts of the proposal upon these species will be assessed following the completion of the further survey through an Ecological Impact Assessment (EclA). The further survey and EclA will be required to support the planning application for the site.

Great Crested Newt eDNA Survey

A Great Crested Newt eDNA Survey has been undertaken to confirm presence or absence of great crested newt within the on-site pond. At the time of writing, the results of the sample analysis are yet to be received. Specific mitigation and/or compensation for great crested newt is to be decided upon receipt of the results.

6.2 Mitigation, Compensation & Enhancement Measures

Mitigation, compensation and enhancement measures required for great crested newt will be determined upon completion of the further surveys.

The following mitigation, compensation and enhancement measures are not dependent on the results of the further surveys and have been included as these will remain the same irrespective of the further survey results (Appendices 4 & 5):

- **Vegetation Management:** The other neutral grassland and modified grassland should be maintained with a short sward height prior to construction. This is to discourage any establishment of amphibians or reptiles within the proposed development area prior to commencement of the works.

- **Excavations/Pipework:** Any excavations or pipework, which are to remain open overnight, should be fenced or covered to prevent potential entrapment and/or injury of species such as badger or hedgehog.
- **Retained Habitats:** The root protection areas (RPA) of retained habitats (hedgerows and trees) must be considered and buffered accordingly. This is to avoid direct damage through the compaction and disturbance of root protection areas which could cause the deterioration of the retained hedgerows and trees.
- **Pond Extension Works:** The pond extension works will be timed to take place outside of the bird nesting season and amphibian breeding season (i.e. undertaken October to January inclusive; although depending on the bird species, geographical area and weather, bird nesting can take place outside of these times). If the works are undertaken during the nesting bird season, a nesting bird check should be undertaken. Should nesting birds be found then works will be required to cease until the nest is no longer active (i.e., until the last chick has fledged).
- **Pollution Prevention:** The construction phase of the works must be planned in accordance with pollution prevention for businesses (gov.uk; 2024) to avoid the release of any soil/spoil, fuels, oils & chemicals associated with machinery, refuelling and construction equipment or cement and concrete into the on-site pond.
- **Habitat Creation:** In accordance within the Biodiversity Metric Assessment, the proposal includes the creation of 0.0331 ha of other neutral grassland, 0.0301 ha of modified grassland, 0.0059 ha of pond, planting of 28 individual trees and the enhancement of 0.298 ha of modified grassland to other neutral grassland. These measures will be required to be secured through a Habitat Management and Monitoring Plan (HMMP), as outlined within Section 6.3.
- **Lighting Plan:** A wildlife sensitive lighting plan will be required ensuring that the retained and created on-site habitats as well as offsite habitats are not impacted by light spill from the proposed development. Specifications are detailed within Section 6.2.1.

- **Invasive Non-native Species Removal:** The identified Japanese Rose is to be eradicated prior to the commencement of the works to ensure this species does not persist or spread within the site or outside the site boundaries.
- **Native Planting:** Post-development landscaping is to include wildlife-attracting species of local provenance.
- **Wildlife Provisions:** At least three inbuilt bat roosting provisions (Appendix 6), three inbuilt bird nesting provisions (Appendix 7) and three inbuilt invertebrate provisions (Appendix 8) are to be installed within the proposed building.
- **Habitat Piles:** Creation of at least two habitat piles, consisting of hardwood logs and/or brash within undisturbed areas adjacent to northeastern site boundary. Habitat piles should be approximately 1 m³ in size and preferably located within relatively undisturbed locations (Appendix 9).

6.2.1 Sensitive Lighting Specification

A sensitive lighting plan should be designed to ensure that any flight routes and surrounding habitats are not negatively impacted by lighting. The sensitive lighting plan should follow the below specification specifically ensuring that there is no light spill above 0.5 lux upon these features and surrounding habitats. Further information can be found within Guidance Note 08/23: Bats and Artificial Lighting at Night.

External Lighting

External lighting should be avoided, however if lighting is required, it will be installed adjacent to access, doorways, steps etc. only, at the minimum height permissible and directed below a 70-degree plane. Any external lighting associated with the development will be adapted to be based on a Passive Infrared Sensor (PIR) system (being motion-sensitive only to large objects) and on a short timer (no longer than 1 minute). The bat access points and corresponding flight lines linking the roosts to the surrounding environment must not be illuminated by any artificial lighting. Lighting will specifically not be positioned where it could illuminate surrounding vegetation (trees, hedgerows etc.) or any areas beyond the development area.

Lighting must be kept at the minimum height permissible. LED luminaires which lack UV elements with glass glazing should be used instead of mercury or metal halide lamps. This type of lighting can be used more directionally and will reduce the range of light wavelengths emitted thus significantly reducing the levels of light which may attract increased levels of invertebrate bat prey items. Such light should be positioned to only illuminate the required areas, limiting light spill, both horizontally and vertically beyond the site.

A warm white spectrum (ideally <2700 Kelvin) should be adopted to reduce the blue light component. Luminaires should feature peak wavelengths higher than 550 nm to avoid the component of light most disturbing to bats (Institution of Lighting Professionals & the Bat Conservation Trust 2018). Additionally, hoods, cowls, louvers and/or shields should be used to further direct any lighting.

Internal Lighting

Internal lighting should be recessed where installed in proximity to windows and blinds should be fitted to reduce glare and light (Institution of Lighting Professionals & the Bat Conservation Trust 2018).

6.3 Management Plans

The measures detailed in Section 6, as well as those to be determined following the EclA, will need to be secured through a Construction Ecological Management Plan (CEMP), Landscape Ecological Management Plan (LEMP) and/or Habitat Management and Monitoring Plan (HMMP).

6.4 Biodiversity Net Gain

The Biodiversity Metric Assessment demonstrates that the proposal will result in an increase of 0.79 (15.95%) area habitat units and 0.23 (223.79%) hedgerow habitat units through the enhancement of modified grassland to other neutral grassland, planting of trees, extension of the existing pond and creation of a native hedgerow with trees. The proposal currently achieves the minimum legal requirement of +10% biodiversity net gain for both area and hedgerow habitats.

6.5 Conclusion

As demonstrated through the Biodiversity Metric Assessment, the proposal currently represents a positive ecological impact to area habitats through the enhancement of modified grassland to other neutral grassland, planting of trees, extension of the existing pond and creation of a native hedgerow with trees. The results of further survey for great crested newt will enable a full assessment of the impacts upon the protected species that have potential to be present on site. Compliance with the Biodiversity Metric Assessment, and implementation of ecological mitigation, compensation and enhancement measures, to be informed by the results of further survey, and implemented through a CEMP, LEMP and/or HMMP, will be required.

DRAFT

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APPENDICES

- Appendix 1: UK Habitat Classification Map
- Appendix 2: Species List
- Appendix 3: Biodiversity Net Gain Plan
- Appendix 4: Mitigation & Constraints Plan
- Appendix 5: Compensation & Enhancement Plan
- Appendix 6: Examples of Inbuilt Bat Roosting Provisions
- Appendix 7: Examples of Inbuilt Bird Nesting Provisions
- Appendix 8: Example of an Invertebrate Provision
- Appendix 9: Examples of Habitat Piles

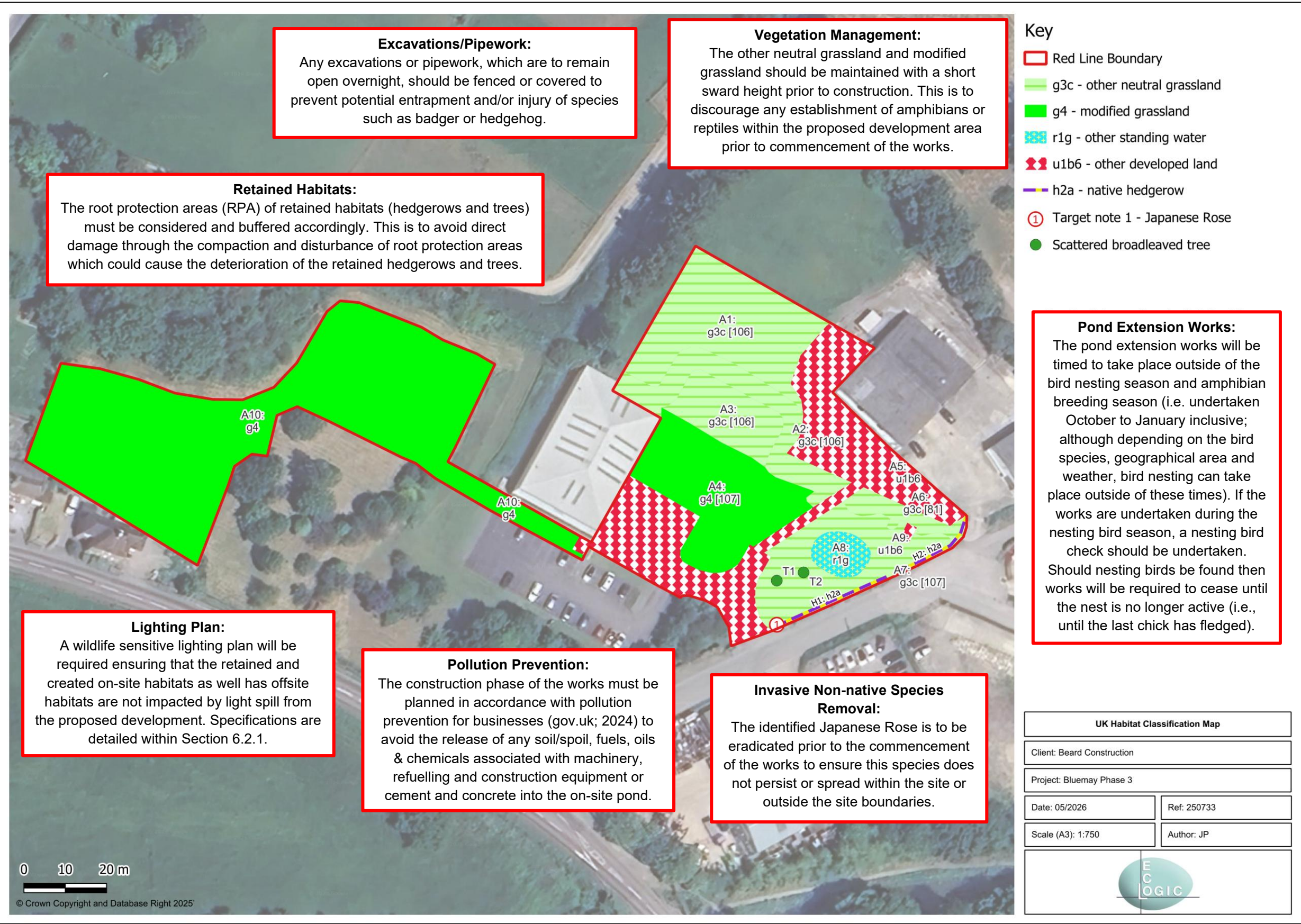
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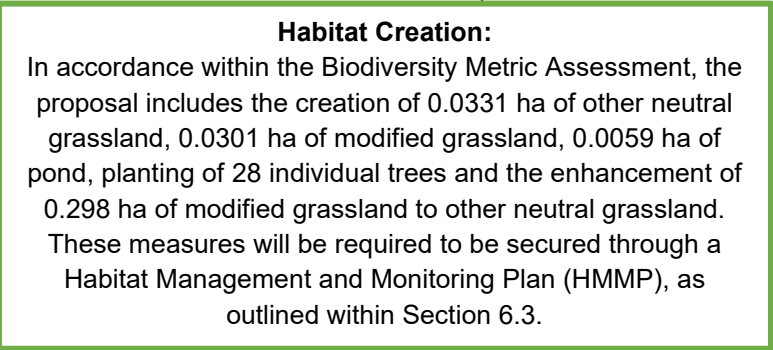


Common Name	Latin Name
Flora	
Autumn hawkbit	<i>Scorzoneroides autumnalis</i>
Bird's-foot trefoil	<i>Lotus corniculatus</i>
Bitter vetch	<i>Lathyrus linifolius</i>
Black bryony	<i>Dioscorea communis</i>
Blackthorn	<i>Prunus spinosa</i>
Blanketweed	<i>Cladophora sp.</i>
Bramble	<i>Rubus fruticosus</i>
Broad-leaved dock	<i>Rumex obtusifolius</i>
Carnation sedge	<i>Carex panicea</i>
Chinese birch	<i>Betula utilis</i>
Cock's-foot	<i>Dactylis glomerata</i>
Common cat's-ear	<i>Hypochaeris radicata</i>
Common daisy	<i>Bellis perennis</i>
Common dandelion	<i>Taraxacum officinale</i>
Common fleabane	<i>Pulicaria dysenterica</i>
Common knapweed	<i>Centaurea nigra</i>
Common melilot	<i>Melilotus officinalis</i>
Common nettle	<i>Urtica dioica</i>
Common ragwort	<i>Jacobaea vulgaris</i>
Common vetch	<i>Vicia sativa</i>
Cow parsley	<i>Anthriscus sylvestris</i>
Crack willow	<i>Salix fragilis</i>
Creeping bent	<i>Agrostis stolonifera</i>
Creeping cinquefoil	<i>Potentilla reptans</i>
Dog rose	<i>Rosa canina</i>
Dove's-foot crane's-bill	<i>Geranium molle</i>
Fescue sp.	<i>Festuca sp.</i>
Field horsetail	<i>Equisetum arvense</i>
Germander speedwell	<i>Veronica chamaedrys</i>
Glaucous sedge	<i>Carex flacca</i>
Goat willow	<i>Salix caprea</i>
Greater horsetail	<i>Equisetum telmateia</i>
Greater willowherb	<i>Epilobium hirsutum</i>
Ground ivy	<i>Glechoma hederacea</i>
Guernsey fleabane	<i>Erigeron sumatrensis</i>
Hard rush	<i>Juncus inflexus</i>
Hawthorn	<i>Crataegus monogyna</i>
Hemp agrimony	<i>Eupatorium cannabinum</i>
Horsetail	<i>Equisetum sp.</i>
Imperforate St. John's wort	<i>Hypericum maculatum</i>

Common Name	Latin Name
Ivy	<i>Hedera helix</i>
Japanese rose	<i>Rosa rugosa</i>
Norway maple	<i>Acer platanoides</i>
Pendulous sedge	<i>Carex pendula</i>
Perennial rye-grass	<i>Lolium perenne</i>
Red clover	<i>Trifolium pratense</i>
Reed mace	<i>Typha latifolia</i>
Ribwort plantain	<i>Plantago lanceolata</i>
Rough hawkbit	<i>Leontodon hispidus</i>
Selfheal	<i>Prunella vulgaris</i>
Spotted medick	<i>Medicago arabica</i>
Sweet vernal grass	<i>Anthoxanthum odoratum</i>
Tufted hair-grass	<i>Deschampsia cespitosa</i>
Tufted vetch	<i>Vicia cracca</i>
Waxcaps	<i>Hygrocybe</i> sp.
White clover	<i>Trifolium repens</i>
Wild parsnip	<i>Pastinaca sativa</i>
Wood-sedge	<i>Carex sylvatica</i>
Yarrow	<i>Achillea millefolium</i>
Yorkshire-fog	<i>Holcus lanatus</i>
Fauna	
Badger	<i>Meles meles</i>
Barn Owl	<i>Tyto alba</i>
Brown long-eared bat	<i>Plecotus auritus</i>
Common frog	<i>Rana temporaria</i>
Common pipistrelle	<i>Pipistrellus pipistrellus</i>
Common toad	<i>Bufo bufo</i>
Dormouse	<i>Muscardinus avellanarius</i>
Great crested newt	<i>Triturus cristatus</i>
Hedgehog	<i>Erinaceus europaeus</i>
Lesser horseshoe bat	<i>Rhinolophus hipposideros</i>
Palmate newt	<i>Lissotriton helveticus</i>
Serotine	<i>Eptesicus serotinus</i>
Smooth newt	<i>Lissotriton vulgaris</i>
Soprano pipistrelle	<i>Pipistrellus pygmaeus</i>
Whiskered bat	<i>Myotis mystacinus</i>







Segovia Build-In Woodstone Bat Box

Material: Woodcrete

Width: 210 mm

Height: 500 mm

Depth: 170 mm

Entrance Width: 160 mm

Entrance Height: 25 mm

Position: Built into external wall, below eaves or at a minimum height of 3 m with the entrance face at the front, remaining exposed and visible. The sides can be removed and multiple boxes placed next to each other to create a larger roosting space



Vivara Pro Woodstone Bat Tube

Material: Woodstone

Width: 160 mm

Height: 400 mm

Depth: 220 mm

Entrance Width: 150 mm

Entrance Depth: 20 mm

Weight: 6 kg

Position: Within external walls in place of a standard block on a southerly aspect, beneath eaves or at a minimum height of 3 m



Green & Blue Bat Block

Material: Cast concrete (75% waste materials from Cornish China Clay Industry)

Width: 215 mm

Height 440 mm

Depth: 120 mm

Position: Within external walls in place of a standard block on a southerly aspect, beneath eaves or at a minimum height of 3 m



WoodStone Build in Open Nest Box

Suitable for: robins, wrens and blackbirds.

Material: Woodstone

Height: 180 mm

Width: 220 mm

Depth: 180 mm

Weight: 4.2kg

Position: Within external walls, at a minimum height of 2 m



Vivara Pro Estelle House Sparrow Terrace

Suitable for: House sparrows and individual blue & great tits

Material: Woodstone

Height: 210 mm

Width: 290 mm

Depth: 160 mm

Weight: 7.5 kg

Position: Within external walls, at a minimum height of 2 m



Schwegler Brick Nest Box (Type 24)

Suitable for: House sparrows, great tits, blue tits and nuthatches

Material: Woodcrete

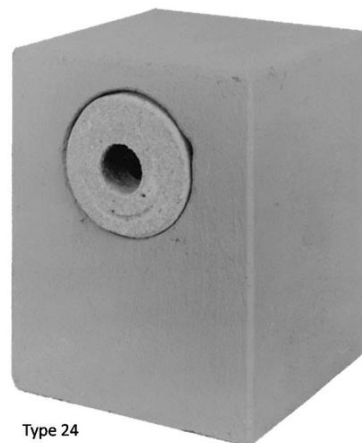
Height: 235 mm

Width: 180 mm

Depth: 180 mm

Weight: 2.8 kg

Position: Within external walls, at a minimum height of 2 m



Type 24

Green & Blue Bee Brick

Suitable for non-swarming solitary bees such as mason bees and leaf cutter bees.

Material: Concrete (75% waste materials from Cornish China Clay Industry)

Height: 215 mm

Width: 105 mm

Depth: 65 mm

Position: Within external wall in a southerly facing location, adjacent to garden/boundary habitats at a minimum height of 2 m.



Habitat Pile

Size: 2-8 m long x 1-1.5 m high

Materials: Logs, brash, bramble cuttings, grass cuttings

Location: Create in marginal habitats adjacent to both low, open vegetation and dense vegetation

Creation:

- A mixture of materials, shapes and sizes should be used to increase complexity of the structure
- The central core of the structure should be compacted and the outer layers laid loosely on top

Management:

- Add additional material to the habitat pile as it decomposes
- Consider partially burying, anchoring or securing with wire if located on a site with high public access

