

# Ecological Impact Assessment

**Proposed Extension, 19c Tinplate Unit,  
Dunkirk Business Park, Southwick,  
Wiltshire**

15 May 2026

Ecology  
Arboriculture  
Land Management





## Report Details

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## Site Details

|                           |                                                                                |
|---------------------------|--------------------------------------------------------------------------------|
| Site Name and Location    | Land to the Rear of Tinplate Unit, Dunkirk Business Park, Southwick, Wiltshire |
| Central OS Grid Reference | ST 82731 54830                                                                 |
| Client                    | Ashford Homes                                                                  |

### Boundary



## Executive Summary

|                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|-----------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Site Location                           | The Site is located north of the A361, southwest of Southwick, Wiltshire. It is surrounded by existing urban and commercial development and agricultural fields.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Proposals                               | Detailed application for an extension to the existing warehouse, with associated hard and soft landscaping.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Survey Work                             | Desk-based study and UK Habitat Classification survey.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Designated Sites with Potential Impacts | Three National Network Sites, namely Salisbury Plain SAC/SPA (7.5km southeast), Mells Valley SAC (9.2km southwest) and Bath and Bradford on Avon Bats SAC (6.6km northwest) are situated within 10km of the Site.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Baseline Habitats                       | The Site comprises an area of modified grassland and scattered tall forbs to the west of the existing modern warehouse building, with a ditch running the length of the western boundary, lined by a species-poor native hedgerow with trees.                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Protected/ notable Species              | The Site is suitable for great crested newts (GCN), badgers, bats including Annex II species, reptiles, and nesting birds.<br>The Site lies within the Amber and Green Risk Zones for GCN District Licencing.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Mitigation and Compensation             | <ul style="list-style-type: none"> <li>Landscaping to include native tree planting, other neutral grassland, modified grassland and mixed scrub within the Site;</li> <li>Sensitive habitat removal will be conducted to encourage reptiles, hedgehog and amphibians to move off Site prior to construction commencing;</li> <li>No vegetation to be removed during the nesting bird season (March to August inclusive) unless checked prior to removal by a qualified ecologist;</li> <li>Wildlife sensitive lighting scheme implemented to ensure minimal light spill onto the boundaries during construction and operation and maintain the site's attraction to foraging bats and other nocturnal species.</li> </ul> |
| Biodiversity Net Gain                   | A separate BNG Statement and Assessment Report is provided (GE Consulting, 2026a).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Enhancements                            | 3 no. integrated bird boxes to be installed on the new building.<br>1 no. integrated bat box to be installed on the new building.<br>1 no. reptile hibernacula to be installed within the northern extents of the Site.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |



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## 1 Introduction

This report presents the results of an Ecological Impact Assessment (EcIA) at Land to the Rear of Tinplate Unit, Dunkirk Business Park, Southwick, Wiltshire in relation to a detailed planning application. The report was commissioned by Ashford Homes.

The area within the application boundary is hereafter referred to as the 'Site'.

### 1.1 Site Context

The Site is located north of the A361, just southwest of Southwick, Wiltshire. Within the wider landscape, Southwick is small town on the southern extents of Trowbridge. The Site is surrounded by existing commercial development and agricultural fields.

### 1.2 Description of Proposed Development

Proposals consist of an extension to the existing warehouse, with associated hard and soft landscaping.

### 1.3 Aims

The aims of this report are to:

-  Identify and describe the habitats and species likely to be affected by the proposed development and assess the ecological value of these features;
-  Identify key ecological constraints to the proposed development and evaluate the significance of any potential effects; and,
-  Provide recommendations for mitigation and enhancement opportunities in accordance with relevant planning policy, legislation and other published guidance (see **Appendix 2**).

## 2 Methods

### 2.1 Desk Study

An internet search was undertaken to identify statutory sites designated for nature conservation value within a 2km radius of the Site boundary (10km for international sites), using the Government's mapping website MAGIC ([www.magic.gov.uk](http://www.magic.gov.uk)). A search was made of MAGIC for European Protected Species (EPS) Mitigation licenses issued by Natural England within 2km of the Site boundary since 2008 and Habitats of Principal Importance (HPI) within or adjacent to the Site boundaries. Aerial photography of the wider area was reviewed to assess connectivity and landscape features which may be important to local biodiversity.

### 2.2 Extended UK Habitat Classification Survey

All habitats within the Site were identified, described and mapped during the field survey in accordance with the UK Habitat Classification (UKHab) (UKHab Ltd. 2023 (V2.0)) and Statutory Biodiversity Metric (Defra 2024) classifications for hedgerows), with other linear and point features mapped using Phase 1 Habitat Survey symbology (JNCC 2010). Primary habitats have been mapped to a minimum mapping unit (MMU) of 25m<sup>2</sup>, although where features of note of a smaller scale are present, these have also been recorded and mapped.

Any habitats with no appropriate primary habitat label were assigned a secondary habitat code. Other secondary UKHab codes were recorded where relevant, although they are described qualitatively within this report for ease of reading. A non-exhaustive botanical species list was compiled, with plant names following Stace (2019).

A digital map was produced using QGIS (QGIS.org, 2026. QGIS Geographic Information System. QGIS Association. Available from: [www.qgis.org](http://www.qgis.org)). The habitat map is shown in **Figure 1**.

### 2.3 Biodiversity Net Gain Assessment

A baseline BNG assessment was undertaken using the statutory biodiversity metric (released in July 2025) to assess the pre-development and indicative post-development value of the habitats on Site following current guidance (Defra,2024). Further details are provided in the BNG Statement and Assessment Report (GE Consulting, 2026a).

### 2.4 Survey Limitations

Care has been taken to ensure that balanced advice is provided on the information available and collected during the study period(s), and within the resources available for the project. However, the possibility of important ecological features being missed due to survey timings, absence during surveys or the year of survey cannot be ruled out. In addition, the lack of evidence or records of protected species on Site does not preclude their presence from Site.

### 3 Baseline Conditions

#### 3.1 Designated Sites

The Site is located within proximity of three National Network Sites:

-  Salisbury Plain SAC/SPA,
-  Mells Valley SAC and;
-  Bath and Bradford on Avon Bats SAC.

The Site lies within the 'medium risk zone' for habitat sensitivity for the Trowbridge and Westbury Bat Mitigation Strategy and within the Consultation Zone C of the Bath and Bradford on Avon Bats SAC.

No Statutory Designated Sites are situated within 2km of the Site and the Site is not located within any SSSI IRZs.

A summary of designated sites within the search area is provided in **Table 1**.

**Table 1: Designated sites records within 2km of Site boundary, 10km for European sites**

| Site Name                                                         | Proximity to Site | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|-------------------------------------------------------------------|-------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>National Site Network</i>                                      |                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Bath and Bradford on Avon Bats Special Area of Conservation (SAC) | 6.6km northwest   | <p><b>Annex II</b> species that are a primary reason for selection of this site:<br/>1304 Greater horseshoe bat <i>Rhinolophus ferrumequinum</i><br/>This site in southern England includes the hibernation sites associated with 15% of the UK greater horseshoe population and is selected on the basis of the importance of this exceptionally large overwintering population.<br/>1323 Bechstein's bat <i>Myotis bechsteinii</i><br/>Small numbers of Bechstein's bats have been recorded hibernating in abandoned mines in this area, though maternity sites remain unknown.</p> <p><b>Annex II</b> species present as a qualifying feature, but not a primary reason for site selection:<br/>1303 Lesser horseshoe bat <i>Rhinolophus hipposideros</i>.</p> |
| Salisbury Plain SAC                                               | 7.5km southeast   | <p><b>Annex I</b> habitats that are a primary reason for selection of this site<br/>5130 Juniperus communis formations on heaths or calcareous grasslands<br/>Salisbury Plain represents <i>Juniperus communis</i> formations near the southern edge of the habitat's range on chalk in southern England, where it is particularly rare. This site is the best remaining example in the UK of lowland juniper scrub on chalk. The juniper is juxtaposed with extensive 6210 semi-natural dry grassland and chalk heath.</p>                                                                                                                                                                                                                                       |

| Site Name           | Proximity to Site | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|---------------------|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                     |                   | 6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates ( <i>Festuco-Brometalia</i> ) (* important orchid sites)<br>This site hosts the priority habitat type "orchid rich sites". Salisbury Plain in central southern England is believed to be the largest surviving semi-natural dry grassland within the EU and is therefore the most important site for this habitat in the UK.                                                                                                                                                                                                                                                                                                                                                                                             |
| Salisbury Plain SPA | 7.5km southeast   | Nationally important breeding populations of stone curlew, hen harrier, quail and hobby. Other Annex I species include merlin, short-eared owl and Montagu's harrier.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Mells Valley SAC    | 9.2km southwest   | <b>Annex I</b> habitats present as a qualifying feature, but not a primary reason for selection of this site<br>6210 semi-natural dry grasslands and scrubland facies on calcareous substrates ( <i>Festuco-Brometalia</i> )<br>8310 caves not open to the public<br>Annex II species that are a primary reason for the selection of this site<br>1304 Greater horseshoe bat <i>Rhinolophus ferrumequinum</i><br>Mells Valley in southern England is selected on the basis of the size of its exceptional breeding population. It contains the maternity site associated with a population comprising about 12% of the UK greater horseshoe bat <i>Rhinolophus ferrumequinum</i> population. A proportion of the population also hibernates at the site, though other hibernation sites remain unknown. |

### 3.2 Habitats and Flora

The distribution of habitats is shown on **Figure 1** and full details with photographs are provided in **Appendix 3**.

The Site comprises an area of modified grassland and scattered tall forbs to the west of the existing modern warehouse building, with a dry ditch running the length of the western boundary, lined by a species-poor native hedgerow with trees. To the northwest of the warehouse lies modified grassland, bramble scrub, blackthorn scrub and areas of tall forbs. Several individual native trees are present adjacent to the ditch along the western boundary. The modified grassland and tall forb habitats on Site are of relatively limited ecological value and are considered to be of **Site** importance. The native hedgerows, scrub and trees are of some ecological importance for protected species and therefore are considered to be of **Local** importance.

### 3.3 Fauna

**Table 2** lists the fauna considered as part of the assessment.

**Table 2: Assessment of Fauna on Site**

| Species/ Group | Location & Rationale                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Amphibians     | <p>The Site is within Natural England's DLL Amber Risk Zone for great crested newts.</p> <p>MAGIC returned 3 GCN survey records from a pond 500m south of the Site boundary in 2018 showing GCN presence. It should be noted that this pond is separated from the Site by the A361 and the Site is therefore unlikely to be associated with the GCN population here.</p> <p>There are two ponds within 250m of the Site boundary, but the only on-site terrestrial habitat for amphibians are the hedgerow bases. The Site is considered to be of <b>Site</b> importance to amphibians.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Badger         | <p>It is possible that badgers may be commuting through the site, albeit no setts were identified. As no signs of badger were identified, further surveys for badgers are not considered necessary.</p> <p>Badger is not listed as a Species of Principal Importance (SPI) for the conservation of biodiversity in England and has therefore not been assigned a scale of importance in this case but will be considered further in this assessment in relation to their legal protection only.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Bats           | <p>Magic returned records of two EPS bat licences:</p> <ul style="list-style-type: none"> <li>One for the destruction of a non-breeding common pipistrelle, serotine and brown long-eared roost (EPSM2011-3903); and</li> <li>One for destruction of a non-breeding common pipistrelle, soprano pipistrelle, serotine and brown long-eared roost (EPSM2010-2578), both c.1.3km northeast of Site in 2010 and 2011.</li> </ul> <p>The warehouse building had negligible potential for roosting bats, as a result of its modern construction and good state of repair, and as such there was a distinct lack of features for crevice dwellings bats and no suitable loft voids present for void dwelling bats. Roosting bats are therefore considered absent from the Site and not considered further within this report.</p> <p>The existing ditch and hedgerow are likely to serve as a commuting and foraging route for bats, forming part of a broader ecological network across the landscape. Given the limited extent of suitable habitat the Site is considered to be of <b>Local</b> Importance to foraging and commuting bats.</p> |
| Birds          | <p>The scrub, hedgerow and areas of tall forb provide some opportunities for nesting birds. However, due to the scale of the development, the limited quantity of these suitable habitats affected and the abundance of these habitats in the wider landscape the Site is considered to be of only <b>Site</b> importance to birds.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Dormouse       | <p>The hedgerow along the Sites southwestern boundary (H1) is of poor species richness and of limited connectivity to the wider landscape.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

| Species/ Group | Location & Rationale                                                                                                                                                                                                                                                                                                                                           |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                | The proposals are not anticipated to impact upon this habitat and therefore further survey work was not considered necessary. The Site is of <b>Negligible</b> importance for dormouse.                                                                                                                                                                        |
| Hedgehog       | The modified grassland, tall forbs, scrub and hedgerow bases on Site may provide suitable foraging habitat for individual hedgehogs though it is unlikely that the species would be reliant upon the Site's resources. The Site is of <b>Site</b> importance to hedgehogs.                                                                                     |
| Invertebrates  | The modified grassland and tall forbs may provide a small area of sub-optimal habitat for common invertebrate species. However, given the size of this parcel of grassland and how common and widespread these habitats are in the local area, the Site is considered to be of <b>Negligible</b> importance of invertebrates.                                  |
| Reptiles       | The scrub, hedgerow and areas of tall forb provide some opportunities for reptiles. Due to the scale of development, the minimal impacts anticipated and the relative abundance of these habitats in the wider survey area, further survey work was not deemed necessary. As such, the Site is considered to be of <b>Site</b> importance for reptile species. |

## 4 Impacts And Mitigation

### 4.1 Designated Sites

Three National Network Sites, namely Salisbury Plain SAC/SPA, Mells Valley SAC and Bath and Bradford on Avon Bats SAC are situated within 10km of the Site. The Site lies within the 'medium risk zone' for habitat sensitivity for the Trowbridge Bat Mitigation Strategy and within the Consultation Zone C of the Bath and Bradford on Avon Bats SAC.

#### 4.1.1 Salisbury Plain SAC and SPA

The nearest site of international significance (Salisbury Plain SAC and SPA) is located approximately 7.5km northwest of the Site. It is possible that the development could cause indirect impacts on these sites through incremental increased recreational use. However, given the Site falls outside of the 6.4km visitor catchment, the scale of the proposed development and the availability of alternative recreational opportunities in closer proximity to the Site, it is considered that no likely significant effects on either statutory designated site will occur as a result of the proposed development.

#### 4.1.2 Bath & Bradford on Avon Bats SAC and Trowbridge and Westbury Bat Mitigation Strategy

The Site lies within the 'medium risk zone' for habitat sensitivity for the Trowbridge Bat Mitigation Strategy and within the Consultation Zone C of the Bath and Bradford on Avon Bats SAC.

#### *Impacts in the Absence of Mitigation*

The proposals will necessitate the removal scrub and areas of modified grassland habitats. Whilst the modified grassland does not provide suitable foraging habitat for greater horseshoe bat or Bechstein's bat (both of which are woodland/hedgerow or pasture specialists), the loss of modified grassland will lead to a direct loss of foraging habitat for lesser horseshoe bats. Additionally, increased lighting and disturbance could occur that would impact Annex II species using the boundary hedgerow for commuting. Recreational pressures are not applicable due to the scale and nature of the proposals.

#### *Mitigation*

The TWBMS describes the mitigation measures considered appropriate for sites within the Yellow sensitivity zone as:

- 👉 No net loss of habitat within the allocation of the Site boundary as demonstrated by the use of the Statutory Biodiversity Metric;
- 👉 Retained core bat habitat remains connected to the wider habitat network and is adequately buffered;
- 👉 Core bat habitat remains relatively undisturbed by the effects of urbanisation; and
- 👉 A financial contribution is made towards funding the LPA scheme for mitigating residual in-combination effects from loss/degradation of bat habitat.

The Statutory Biodiversity Metric has confirmed that no net loss of habitat is to occur within the Site boundary (GE Consulting 2026a; GE Consulting 2026b). This is being achieved by the creation of other neutral grassland, mixed scrub, modified grassland, individual trees and native species-rich hedgerow planting. The existing hedgerow on the southwestern boundary will be retained in its entirety. The landscaping proposed will provide suitable foraging habitat and strengthen the already existing corridors through the Site.

The TWBMS recommends that new core bat habitat is created where lux levels must be less than 0.2 on the horizontal plane and below 0.4 on the vertical plane which is then suitably buffered by a dark corridor where light levels can reach a maximum of 1 lux.

As such, an 8.5m buffer has been proposed along the southwestern boundary (H1) to form the new core bat habitat through the retention of bramble scrub, blackthorn scrub, individual trees and a species-poor hedgerow with hard board fencing to contain any light spill and thus protecting the newly created core bat habitat as well as retaining and protecting the existing core bat habitat (H1). No additional lighting in any capacity is proposed on the southwestern exterior aspect of the extension, and the design will specify no windows on this aspect to ensure no additional artificial light is allowed to spill onto the boundary feature. These measures will ensure the baseline conditions are maintained, allowing the numbers of light-averse bats that are currently using the Site to continue to do so.

#### 4.1.3 Mells Valley SAC

The nearest component roost of the Mells Valley SAC lies 9.2km southwest of the Site and the Site does not fall within a consultation zone for the SAC. The Mells Valley SAC is designated for greater horseshoe bats and therefore the mitigation implemented for the Bath and Bradford on Avon Bats SAC and TWBMS described above will mitigate any impacts for bats associated with the Mells Valley SAC. Additionally, adult greater horseshoe bats are known to travel up to 8km from maternity roosts to foraging areas (Billington, G. 2003) and therefore bats specifically associated with this component roost are unlikely to be using the Site.

## 4.2 Habitats and Flora

To facilitate the development the destruction and removal of habitats is anticipated. These will include a majority proportion of the modified grassland, blackthorn scrub, bramble scrub and tall forbs habitat.

To compensate for the loss of these habitats new mixed scrub, other neutral grassland, and native trees will be planted within the Site boundary to offset any potential biodiversity loss due to the development.

All other habitats within the Site are to be retained and/ or enhanced.

The loss of habitats within the Site is not considered significant in ecological terms given the common and widespread nature of the habitats and limited ecological value. Measures to ensure successful establishment of new habitats and maintain the value of all ecological features in the long-term, will be

detailed within a Habitat Management and Monitoring Plan (HMMP) which will be controlled through the deemed Biodiversity Gain condition.

### 4.3 Fauna

#### 4.3.1 *Amphibians*

The Site is situated within an 'Amber Zone' of Natural England's District Level Licensing (DLL) Scheme. While habitats present within the Site offer limited suitability for GCN, records have confirmed the presence of a GCN population 500m south of the Site in 2018. Although records of GCN in 2018 are separated from the Site by a major barrier (A361), it is possible that GCN and other common amphibians may utilise the hedgerow base within the Site and that, in the absence of mitigation, construction activities could result in potential impacts to these species that are utilising the Site during their terrestrial phase.

To mitigate for this, the hedgerow will be fully retained and protected as part of the scheme. Furthermore, the scheme will be registered under Natural England's DLL scheme. Proof of registration will be submitted separately once the process is complete.

With the proposed mitigation and compensation measures no significant impacts are anticipated, with the measures proposed considered to represent an enhancement for GCN and other amphibians within the Site.

#### 4.3.2 *Bats*

##### 4.3.2.1 *Commuting and foraging*

Without appropriate mitigation, an increase in lighting during both construction and operation have the potential to adversely impact light averse species of bats that forage and commute within the Site.

To minimise the impacts on commuting and foraging bats, all boundary vegetation will be retained, protected and suitably buffered as part of the scheme.

During the construction phase, the following mitigation measures will be implemented:

- 👉 All works will be undertaken during daylight hours, with works commencing no earlier than 30 minutes prior to sunrise and finishing no later than 30 minutes after sunset. No artificial lighting will be left on outside of normal working hours; and
- 👉 Where security lighting is required, it is recommended that these are motion activated with hooded luminaires, and these must be directed away from boundary hedgerows and bat and bird boxes.

During the operational phase, the following mitigation measures will be implemented:

- 👉 There will be no additional lighting in any capacity to the rear elevation of the proposed extension during the operational phase;
- 👉 Luminaires will not be directed at sensitive habitats, boundary vegetation or onto bat and bird boxes. Where required, lights can be fitted with hoods, baffles or louvres to reduce back-spill;
- 👉 Only luminaires with an upward light ratio of 0% will be used, and low-level bollard lighting will be used where feasible to retain darkness above the luminaire;
- 👉 All external luminaires used on site will lack UV elements and will be warm-white coloured (<2700 Kelvin) to reduce blue-light components;
- 👉 LED luminaires will be used due to their sharp cut-off, lower intensity, good colour retention and dimming capability; and
- 👉 Where security lighting is installed this will be motion-activated.

It is anticipated that the habitat retention and creation measures detailed previously will provide greater diversity and quality of habitats within the Site for commuting and foraging bats. With the proposed mitigation and compensation measures no significant impacts are anticipated for on commuting and foraging bats.

#### 4.3.3 Birds

In the absence of mitigation, there is a risk that the loss /fragmentation of the hedgerows and associated trees, individual trees and bramble scrub will lead to a negative impact on the breeding bird population within the Site. In addition, if construction takes place during the breeding bird season, increased disturbance caused by construction noise, dust and vibration is likely to affect the ability of birds to hold territory and breed successfully within habitats adjacent to the works area. To mitigate for this, the hedgerow (H1) will be retained and protected as part of the development.

Furthermore, any vegetation clearance, including the future management of habitats, should be undertaken outside of the breeding bird season (March to August inclusive). If this is not practicable, then works should be preceded by a nesting bird check by a suitably qualified ecologist within 48 hours of the commencement of works. If nesting birds are found to be present then an appropriate buffer will be implemented around the nest, in which no works can take place until all birds have fledged.

A cluster of integrated bird boxes are proposed as an ecological enhancement to the new development. This will provide protected colony-nesting species such as house sparrow with nesting opportunities which, at baseline condition, were limited to the hedgerow habitat.

With the proposed mitigation and enhancement measures no significant impacts are anticipated for breeding birds, with the measures proposed considered to represent an enhancement for birds within the Site.

#### 4.3.4 Badger and hedgehog

To protect any badgers that may be utilising the Site, the following precautionary measures will be followed:

- 🦡 Trenches will be covered at the end of each working day and any temporarily exposed pipes will be capped to prevent badger gaining access during the night;
- 🦡 Any trenches or deep pits which must be left open overnight will be provided with a means of escape should a badger enter. This would simply be in the form of a roughened plank of wood placed in the trench as a ramp to the surface;
- 🦡 Any trenches/pits will be inspected each morning to ensure no badgers have become trapped overnight. Should a badger become trapped in a trench it may attempt to dig itself into the side of a trench and form a temporary sett. Should a trapped badger be encountered, the advice of an ecologist must be sought immediately. If necessary, the ecologist will contact the RSPCA or a vet who will move the badger to safety or provide treatment if required;
- 🦡 The storage of topsoil or other 'soft' building material within the construction site will be given careful consideration to prevent badgers digging in.
- 🦡 Food and litter are not to be left within the working area overnight to minimise the potential for any roaming badgers to be attracted to the construction site; and
- 🦡 The storage of any chemical within the construction site will be contained in such a way that they cannot be consumed or knocked over by any wildlife.

The mitigation measures outlined above will also serve to protect hedgehogs and other mammals from harm. In addition, any features with potential to support hedgehog will be removed sensitively either by a check prior to removal, or by sensitive removal to ground level to allow a visual check for hedgehog. If

a hedgehog is found at any point during construction works, then works must stop immediately and an ecologist contacted in the first instance.

#### 4.3.5 Reptiles

Although the Site doesn't provide the necessary habitat to support a notable population of reptiles, it is considered possible that small numbers/individuals may be present. Therefore, the following precautionary measures will be followed to protect reptiles from harm:

- 🦎 Sensitive clearance of any grassland habitat will be undertaken under the supervision of an ecologist;
- 🦎 Once mown, grassland should be maintained to keep the sward short, discouraging reptiles from moving into areas of the Site which may be impacted by works; and
- 🦎 All habitat removal will be undertaken in suitable weather conditions (dry, warm days when temperatures are above 10°C).

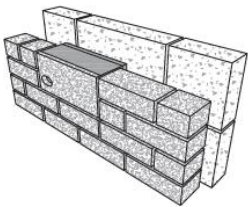
## 5 Biodiversity Net Gain

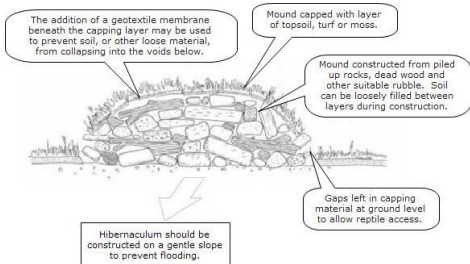
The baseline units for the Site comprise 2.09 habitat units, 1.82 hedgerow units and 0 watercourse units. An indicative BNG assessment suggests that the Site is likely to be capable of delivering 10% onsite. This will ensure that there is no net loss of biodiversity as recommended in paragraph 146 of the TWBMS. Further details are provided in the BNG Statement and Assessment Report (GE Consulting, 2026a), which provides the BNG information required to support the planning application under Article 7 of The Town and Country Planning (Development Management Procedure) (England) Order 2015 and in the submitted statutory biodiversity metric (GE Consulting, 2026b).

## 6 Protected/Notable Species Features

The following enhancements features detailed in **Table 3** are recommended in line with national guidance and local planning policy. Locations are shown in **Figure 2**.

**Table 3: Enhancement Features**

| Quantity & Type                        | Illustrations                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Description & Installation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|----------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 3 no.<br>integrated bird<br>nest boxes |  <p>WoodStone Build-in Swift Nest Box Deep (<a href="https://www.nhbs.com">nhbs.com</a>)</p>  <p>Afs 'S' brick</p>  <p>Installation – integral nestbox installed in outer leaf of brickwork in a traditional cavity wall construction</p> | <ul style="list-style-type: none"> <li>Fully integrated boxes to be built into the fabric of the building. These are more secure and eliminate future maintenance requirements.</li> <li>Suitable models include the PRO UK Rendered Build-in Swift Box, WoodStone Build-in Swift Nest Box Deep or the Action for Swifts (AfS) 'S' brick which can be chosen to suit the finish of the building. Suppliers include <a href="https://www.nhbs.com">nhbs.com</a>, <a href="https://www.wildcare.co.uk">wildcare.co.uk</a> and <a href="https://www.actionforswifts.com/">actionforswifts.com/</a>.</li> <li>Swift boxes are recommended as they are considered a universal box suitable not only for swifts but also for house sparrows and other small birds (CIEEM, 2021).</li> <li>Install at the highest point of the building, ideally at least 5m above ground level.</li> <li>To be sited under the shelter of eaves or overhanging roofs where possible, avoiding locating above doors and windows.</li> <li>Entrance out of direct sun and the prevailing weather and away from perches/ledges where birds are at risk from predators.</li> <li>Ensure a clear flyway of ideally at least 5m, avoiding obstructions such as trees.</li> </ul> <p>See <a href="https://www.swift-conservation.org">swift-conservation.org</a> for additional advice.</p> |

| Quantity & Type                         | Illustrations                                                                                                                                                                                                                                            | Description & Installation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|-----------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 no.<br>integrated bat<br>boxes        |  <p>Vivara Pro Build-in Woodstone Bat Box and Habibat Bat Box</p>  <p>Installation</p> | <ul style="list-style-type: none"> <li>Fully integrated box to be built into the fabric of the building. Install within the cavity of house walls. The entrance hole can sit flush to a course of bricks.</li> <li>Suitable models include the Vivara Pro Build-in Woodstone Bat Tube, Habibat Bat Box or similar approved which can be chosen to suit the finishing of the building. Suppliers include <a href="http://www.nhbs.com">www.nhbs.com</a> and <a href="http://www.wildcare.co.uk">www.wildcare.co.uk</a>.</li> <li>Position a minimum of 3m above the ground.</li> <li>Locate where there is a clear, unlit flight path for bats to linear vegetation (e.g. hedgerows) and away from windows.</li> </ul> <p>Install away from any artificial light sources, to prevent light spill illuminating the boxes.</p> |
| 1 no.<br>hibernaculum/<br>habitat piles |  <p>Example hibernaculum design</p>                                                                                                                                   | <ul style="list-style-type: none"> <li>Provide hibernacula/ habitat piles for fauna such as reptiles, mammals and invertebrates.</li> <li>Constructed from dead wood and rubble, topped with loose soil and turf. Dimensions to be a minimum of 2m length x 1m width x 1m height.</li> </ul> <p>Located in suitable locations such as within the northeastern extents of the Site, adjacent to the new other neutral grassland.</p>                                                                                                                                                                                                                                                                                                                                                                                         |

## 7 Conclusions

In summary the Site was considered to be of relatively low ecological interest, with minimal adverse impacts predicted on important ecological features. Although the Site lies within the 'medium risk zone' for habitat sensitivity for the Trowbridge Bat Mitigation Strategy and within the Consultation Zone C of the Bath and Bradford on Avon Bats SAC, with the mitigation measures detailed in **Section 4** the impacts to these designated sites will not be significant.

Avoidance measures and careful timing of works have been incorporated into the design to minimise impacts to protected and notable species; and habitat creation has been included to compensate for habitat loss. These are illustrated in **Figure 2**.

Provided the avoidance and mitigation measures are carried out, the proposal is considered unlikely to have significant adverse effects on ecological features.

Enhancement features have been described with the aim of providing an increase in wildlife opportunities on Site post-development, contributing to the aims of National Planning Policy Framework. An indicative Biodiversity Metric has been supplied which shows a gain of +10% in both habitat and hedgerow units is achievable on-site.

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### Key:

- Site Boundary
- 1160 - Introduced shrub
- Tall forbs
- g4 - Modified grassland
- h3a - Blackthorn scrub
- h3d - Bramble scrub
- u1b - Developed land, sealed surface
- Native Hedgerow with trees - Associated with
- Urban Tree (Broadleaved)

Plan is to Scale

Scale at A4: **1:700**



Imagery ©2026 CNES / Airbus, Getmapping plc, Infoterra Ltd & Bluesky, Maxar Technologies. Map data ©2026 Google

**Figure 1:**

On-site Baseline Habitat Plan

### Project:

Proposed Extension, 19c Tinplate, Southwick

### Client:

Ashford Homes

### Date:

6/5/2026

### Ref:

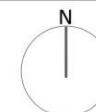
3002-EclA-F1

### Drawn:

HK

### Revision:

-





### Key:

- 1 no. Reptile Hibernacula
- 1 no. Integrated Bat Box
- ◆ 3 no. Integrated Bird Box



Landscape plan - Dukirk Business Park, Southwick - Greenhalgh  
Landscape Architecture 2026

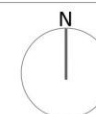
**Figure 2:**  
Enhancements and Mitigation

**Project:**  
Proposed Extension, 19c Tinplate, Southwick

**Client:**  
Ashford Homes

**Date:**  
7/5/2026  
**Ref:**  
3002-EclA-F2

**Drawn:**  
HD  
**Revision:**  
-



## Appendix 1 – General Glossary of Terms

|          |                                                                                                                      |
|----------|----------------------------------------------------------------------------------------------------------------------|
| Annex I  | Threatened bird listed on Annex I of the EC Birds Directive/ Habitats listed on Annex I of the EC Habitats Directive |
| Annex II | Species of community interest whose conservation requires the designation of SACs                                    |
| BAP      | Biodiversity Action Plan                                                                                             |
| BMCL     | Bat Mitigation Class Licence                                                                                         |
| BNG      | Biodiversity Net Gain                                                                                                |
| BoCC     | Bird of Conservation Concern                                                                                         |
| CEMP     | Construction Environmental Management Plan                                                                           |
| CWS      | County Wildlife Site                                                                                                 |
| DBW      | Daytime Bat Walkover                                                                                                 |
| EPS      | European Protected Species                                                                                           |
| GLTA     | Ground Level Tree Assessment                                                                                         |
| HPI      | Habitat of Principal Importance required under Section 41 of the NERC Act 2006                                       |
| HSI      | Habitat Suitability Index                                                                                            |
| IRZ      | Impact Risk Zone                                                                                                     |
| GCN      | Great crested newt                                                                                                   |
| JNCC     | Joint Nature Conservation Committee                                                                                  |
| LBAP     | Local Biodiversity Action Plan                                                                                       |
| LEMP     | Landscape and Ecology Management Plan                                                                                |
| LPA      | Local Planning Authority                                                                                             |
| LWS      | Local Wildlife Site                                                                                                  |
| MMU      | Minimum Mapping Unit                                                                                                 |
| NBW      | Night-time Bat Walkover                                                                                              |
| NE       | Natural England                                                                                                      |
| NERC Act | Natural Environment and Rural Communities Act 2006                                                                   |
| NPPF     | National Planning Policy Framework                                                                                   |
| NVA      | Night Vision Aid                                                                                                     |
| NVC      | National Vegetation Classification Survey                                                                            |
| OSWI     | Other Site of Wildlife Interest                                                                                      |
| pCWS     | Potential County Wildlife Site                                                                                       |
| POS      | Public Open Space                                                                                                    |
| PRA      | Preliminary Roost Assessment                                                                                         |
| PRF      | Potential Roost Feature                                                                                              |
| Ramsar   | A wetland site designated to be of international importance under the Ramsar Convention                              |
| RPA      | Root Protection Area                                                                                                 |
| SAC      | Special Area of Conservation                                                                                         |
| SPA      | Special Protection Area                                                                                              |
| SPI      | Species of Principal Importance required under Section 41 of the NERC Act 2006                                       |
| SSSI     | Site of Special Scientific Interest                                                                                  |
| SuDS     | Sustainable Drainage Systems                                                                                         |
| UKHab    | UK Habitat Classification System                                                                                     |
| UWS      | Unconfirmed Wildlife Site                                                                                            |
| WCA      | Wildlife and Countryside Act 1981(as amended)                                                                        |
| ZOI      | Zone of Influence                                                                                                    |

## **Appendix 2 – Planning Policy and Legislation**

### **Habitat and Species Legislation**

Species and habitats receive legal protection in the UK under various legislation, including:

- 🦋 The Conservation of Habitat and Species Regulations 2017 (as amended);
- 🦋 The Countryside Rights of Way (CROW) Act 2000;
- 🦋 The Hedgerows Regulations 1997;
- 🦋 The Protection of Badgers Act 1992; and
- 🦋 The Natural Environment and Rural Communities (NERC) Act 2006.

Where relevant, this report takes into account the legislative protection afforded to specific habitats and species.

### **Environment Act 2021**

The Environment Act 2021 operates as the UK's legal framework for environmental protection and provides legislation on environmental governance, principles, targets and improvement plans, waste and resource efficiency, nature protection, and water and air quality.

Part 6 of the Environment Act 2021 requires a minimum 10% biodiversity net gain for all new developments (with specified exemptions), and amends Schedule 7a (Biodiversity Gain in England) of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021) to mandate this in England. This will apply to most major developments from 12<sup>th</sup> February 2024 and to small sites from 2 April 2024.

The biodiversity net gain regulations most directly relevant to planning are:

- 🦋 The Environment Act 2021 (Commencement No. 8 and Transitional Provisions) Regulations (2024)
- 🦋 The Biodiversity Gain Requirements (Exemptions) Regulations (2024)
- 🦋 The Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations (2024)
- 🦋 The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations (2024).

In addition, there are regulations for the Biodiversity Gain Site register established under section 100 of the Environment Act 2021 for registered off-site biodiversity gains.

### **National Planning Policy Framework 2023**

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how local planning authorities should incorporate them into their own policies and plans. Section 15 of the NPPF contains several policies targeted at enhancing the natural environment and requires local authorities to consider how impacts on biodiversity can be minimised and provide net gains in biodiversity. Paragraph 180 (a-f) states that:

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

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

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

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

*d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*

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

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

*In addition, paragraph 185 (b) ensures that to protect and enhance biodiversity and geodiversity, plans should:*

*“b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.”*

Additional Planning Practice Guidance (PPGs) supports the NPPF and includes guidance on:

-  Agricultural land, soil and brownfield land of environmental value;
-  Green infrastructure;
-  Biodiversity, geodiversity and ecosystems; and
-  Landscape.

### **Wiltshire Planning Policy**

The Wiltshire Core Strategy Development Plan Document ('the plan') was formally adopted in January 2015. The plan provides a positive and flexible overarching planning policy framework for Wiltshire for the period up to 2026. It contains the relevant planning policies:

-  Core Policy 50 – Biodiversity and Geodiversity
-  Core Policy 52 – Green Infrastructure

### **Post-2010 Biodiversity Framework**

The UK Biodiversity Action Plan (UK BAP) was succeeded in 2012 by the 'UK Post-2010 Biodiversity Framework' which demonstrates a whole-environment strategy on how the UK contributes to achieving the Convention on Biological Diversity's (CBD) 20 Aichi Biodiversity Targets. In England, 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services' (Defra, 2011) sets out the strategic direction for biodiversity policy in the future. The former UK BAP was used to draw up lists of species and habitats of 'principal importance' which continue to be regarded as priorities under the Post-2010 Biodiversity Framework and are identified under Section 41 of the NERC Act 2006; these species have been considered throughout this report.

### Appendix 3 – Site Photographs

| Description                                                                                                                                                                                                                                                                                                                                                              | Photograph                                                                          |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|
| <p>Modified grassland (<b>G1</b>) with adjacent tall forbs and scrub habitats. Species within <b>G1</b> include: perennial ryegrass, white clover, creeping buttercup, Yorkshire fog, black medic, creeping thistle, false oat grass, selfheal, bristly ox tongue, common mouse ear, silver weed, common ragwort, curled dock, spear thistle, red fescue and others.</p> |   |
| <p><b>H1</b> – species-poor native hedgerow species included: ash, hawthorn and elm.</p>                                                                                                                                                                                                                                                                                 |  |

| Description                                                                  | Photograph                                                                          |
|------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|
| <p>Developed Land south of <b>B1</b> along the Site's southern boundary.</p> |   |
| <p>Tall forbs along the northwestern boundary.</p>                           |  |

## Appendix 4 – List of Flora and Fauna Mentioned in Text

### Flora

| Common name        | Scientific name                 | Recorded on Site? |
|--------------------|---------------------------------|-------------------|
| Black medic        | <i>Medicago lupulina</i>        | ✓                 |
| Bramble            | <i>Rubus fruticosus</i>         | ✓                 |
| Bristly oxtongue   | <i>Helminthotheca echioides</i> | ✓                 |
| Common dock        | <i>Rumex obtusifolius</i>       | ✓                 |
| Creeping buttercup | <i>Ranunculus repens</i>        | ✓                 |
| Creeping thistle   | <i>Cirsium arvense</i>          | ✓                 |
| False oat-grass    | <i>Arrhenatherum elatius</i>    | ✓                 |
| Juniper            | <i>Juniperus communis</i>       |                   |
| Mouse-ear          | <i>Cerastium fontanum</i>       | ✓                 |
| Perennial ryegrass | <i>Lolium perenne</i>           | ✓                 |
| Ragwort            | <i>Jacobaea vulgaris</i>        | ✓                 |
| Red fescue         | <i>Festuca rubra</i>            | ✓                 |
| Selfheal           | <i>Prunella vulgaris</i>        | ✓                 |
| Silverweed         | <i>Potentilla anserina</i>      | ✓                 |
| Spear thistle      | <i>Cirsium vulgare</i>          | ✓                 |
| White clover       | <i>Trifolium repens</i>         | ✓                 |
| Yorkshire fog      | <i>Holcus lanatus</i>           | ✓                 |

### Fauna

| Common name           | Scientific name                  | Recorded on Site? |
|-----------------------|----------------------------------|-------------------|
| Badger                | <i>Meles meles</i>               |                   |
| Bechstein's bat       | <i>Myotis bechsteinii</i>        |                   |
| Brown long-eared bat  | <i>Plecotus auritus</i>          |                   |
| Common pipistrelle    | <i>Pipistrellus pipistrellus</i> |                   |
| Great crested newt    | <i>Triturus cristatus</i>        |                   |
| Greater horseshoe bat | <i>Rhinolophus ferrumequinum</i> |                   |
| Hedgehog              | <i>Erinaceus europaeus</i>       |                   |
| Hen harrier           | <i>Circus cyaneus</i>            |                   |
| Hobby                 | <i>Falco subbuteo</i>            |                   |
| House sparrow         | <i>Passer domesticus</i>         |                   |
| Lesser horseshoe bat  | <i>Rhinolophus hipposideros</i>  |                   |
| Merlin                | <i>Falco columbarius</i>         |                   |
| Montagu's harrier     | <i>Circus pygargus</i>           |                   |
| Quail                 | <i>Coturnix coturnix</i>         |                   |
| Serotine              | <i>Eptesicus serotinus</i>       |                   |
| Short-eared owl       | <i>Asio flammeus</i>             |                   |
| Soprano pipistrelle   | <i>Pipistrellus pygmaeus</i>     |                   |
| Stone curlew          | <i>Burhinus oedicephalus</i>     |                   |
| Swift                 | <i>Apus apus</i>                 |                   |

Website: [www.ge-consulting.co.uk](http://www.ge-consulting.co.uk)  
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