Herdwick Ecology

Preliminary Ecological Appraisal and Biodiversity Net Gain Assessment – Air Source Heat Pump Array

Swallowcliffe Manor, Swallowcliffe, Wiltshire, SP3 5PB

For SPASE and on behalf of Mr & Mrs Borton

May 2026

DOCUMENT CONTROL SHEET

Project Name: **Swallowcliffe Manor, Salisbury, SP3 5PB**
Preliminary Ecological Appraisal and Biodiversity Net Gain Assessment
Air Source Heat Pump Array

Client: **Mr & Mrs Borton**

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1.0 Introduction

1.1 Herdwick Ecology Ltd has been commissioned by SPASE and on behalf of Mr & Mrs Borton to undertake a Preliminary Ecological Appraisal and Biodiversity Net Gain assessment at Swallowcliffe Manor, Swallowcliffe, Salisbury, Wiltshire, SP3 5PB (Central Reference ST 96703 27253) to inform proposals for a new Air Source Hear Pump (ASHP) array.

1.2 This report has been prepared by Ceri Griffiths, Director at Herdwick Ecology, who is a Full Member of the Chartered Institute of Ecology and Environmental Management (CIEEM). Reference is made to CIEEM Guidelines for Preliminary Ecological Appraisal[1] and BS 42020:2013 Biodiversity - Code of practice for planning and development[2].

2.0 Aims and objectives

2.1 This report support a full planning application to Wiltshire Council and aims to:

- Review the relevant biological records and assess their significance;
- Identify any protected species issues or potential issues that may exist;
- Assess possible ecological constraints to development and make recommendations to avoid, minimise and mitigate for any potential impacts during the development; and
- Set out opportunities for net gain and ecological enhancements in line with relevant planning policy, legislation and other published guidance to inform a detailed application.

3.0 Legislation and Planning Policies

3.1 In carrying out this assessment relevant legislation, planning policies, and best practice guidelines were consulted and include:

- Conservation of Habitats and Species Regulations 2017 (as amended);
- Wildlife and Countryside Act 1981 (as amended);
- Countryside and Rights of Way (CRoW) Act 2000;
- Natural Environment and Rural Communities (NERC) Act 2006;
- National Planning Policy Framework 2024 (NPPF);
- Local Planning Policies and supplementary planning documents/technical guidance.

National Planning Policy Framework (NPPF) 2024

3.2 National planning policy on biodiversity and conservation is set out in the National Planning Policy Framework (NPPF). This emphasises that the planning system should seek to minimise impacts on biodiversity and provide net gains in biodiversity wherever possible as part of the Government's

[1] CIEEM (2017) *Guidelines for Preliminary Ecological Appraisal* (2nd. Ed.) CIEEM
[2] BSI (British Standards Institute) BS4202:2013 *Biodiversity – A code of practice for planning and development*. BSI, London.

commitment to halting declines in biodiversity and establishing coherent and resilient ecological networks. Chapter 15: Conserving and Enhancing the Natural Environment, is of particular relevance to this report as it relates to ecology and biodiversity. Relevant policies are set out below:

3.3 Paragraph 185: "*To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and 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…*

3.4 Paragraph 186 states: "When determining planning applications, local planning authorities should apply the following principles:

a) '*if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts) adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused'*

b) Relates to developments affecting SSSI

c) Relates to developments affecting irreplaceable habitats, such as ancient woodland

d) '*Development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity'.*

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

3.6 The above approach encapsulates the 'mitigation hierarchy' described in British Standard BS 42020:2013, which involves the following step-wise process:

- Avoidance – avoiding adverse effects through good design;
- Mitigation – where it is unavoidable, mitigation measures should be employed to minimise adverse effects;
- Compensation – where residual effects remain after mitigation it may be necessary to provide compensation to offset any harm; and
- Enhancement – planning decisions often present the opportunity to deliver benefits for biodiversity, which can also be explored alongside the above measures to resolve potential adverse effects.

3.7 The measures for avoidance, mitigation, compensation, and enhancement should be '*proportionate to the predicted degree of risk to biodiversity and to the nature and scale of the proposed development*'

Conservation of Habitats and Species Regulations 2017 (as amended)

3.8 In summary these regulations, also referred to as the Habitat Regulations, cover the designation and protection of European sites and the protection of European protected species (EPS).

Environment Bill and Biodiversity Net Gain

3.9 The Environment Bill received Royal Assent on 9th November 2021, becoming the Environment Act; this includes the provision of biodiversity gain for developments in England, which will be mandated through an amendment to the Town and Country Planning Act 1990. The two-year transition period that follows Royal Assent means that mandatory Biodiversity Net Gain (BNG) became law on 12th February 2024, with small sites being mandatory on the 2nd April 2024 under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021)

Local Plan

3.10 The Wiltshire Core Strategy Development Plan Document ('the plan') was formally adopted on 20 January 2015. The plan provides a positive and flexible overarching planning policy framework for Wiltshire for the period up to 2026. Policy 50 'Biodiversity and Geodiversity' states that: '*Development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term…. All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development.* The policy goes on to state that all developments should seek opportunities to enhance biodiversity.

Species Protection

3.11 A number of species, including all bats and great crested newts, are afforded protection under The Wildlife and Countryside Act 1981 (as amended)

3.12 Under this legislation, a person is guilty of an offence if a person intentionally or recklessly:

- disturbs any animal while it is occupying a structure or place which it uses for shelter or protection;
- obstructs access to any structure or place which any animal uses for shelter or protection.

3.13 In addition the protection afforded through UK legislation, further protection is provided to a small group of species, commonly referred to as 'European Protected Species' under the Conservation of

Habitats and Species 2017 (as amended) (also known as the Habitats Regulations)., including bats and great crested newts.

3.14 With regards to European Protected Species listed under Schedule 2 of the Act, it is an offence to:

- Intentionally or deliberately capture or kill, or intentionally injure the animal;
- Deliberately disturb the animal or intentionally or recklessly disturb them in a place used for shelter or protection;
- Damage or destroy a breeding site or resting place;
- Intentionally or recklessly damage, destroy or obstruct access to a place used for shelter or protection.

3.15 The NERC Act also listed species of principle importance under Section 41 of the Act. This places further duties on the LPA to have due regard for the conservation of these species, such as hedgehog or certain bird species, which may be present on-site.

4.0 Methodology

Data Search

4.1 Online sources were reviewed, such as MAGIC[3], to search for designated sites, priority habitats and records of local European Protected Species (EPS) licence. In addition, the Wiltshire Council planning portal was searched for nearby applications.

4.2 Given the small scale of the development and habitats within the locality, a full data search was not considered necessary.

Preliminary Ecological Appraisal

4.3 The site was surveyed on 25th February 2026 by Ceri Griffiths, Director of Herdwick Ecology, with full membership of Chartered Institute of Ecology and Environmental Management (CIEEM) and a Natural England bat and great crested newt licence holder. Weather conditions were dry and overcast, with a temperature of 3°C.

Biodiversity Net Gain Assessment

4.4 The Statutory Biodiversity Metric is designed to provide a quantitative approach to assessing the changes in biodiversity value brought about by development or changes in land management. It is a habitat-based approach and uses the attributes of a habitat to provide a biodiversity value based on components such as distinctiveness, condition and strategic significance of the existing habitat as well as time to establish and difficulty of creation for proposed habitats.

[3] https://magic.defra.gov.uk/

4.5 The baseline BNG calculations, as outlined below, provides a numerical habitat value which indicates the existing value of the habitats present on the site based on the identified habitat types and their condition score.

Pre-development habitat baseline approach

4.6 The habitat baseline used to support the biodiversity net gain assessment has been taken from an habitat survey undertaken by Herdwick Ecology in February 2025. Whilst this is not the optimum time of year for botanical surveys, given the common habitat type and the small scale of the development, this is not considered to be a significant constraint. The Baseline Habitat data is illustrated in Plate 3 below.

4.7 The Statutory Biodiversity Metric habitat types are based on a set of habitats as defined by the UK Habitat Classification System (UK Habitat Classification Working Group, 2018), although there are some discrepancies between how some habitats are defined, as not all UK Habitat Classification System primary habitat types are included within the selection of habitats included within the metric.

5.0 Baseline Conditions

5.1 The Application Site lies in a rural location in the small village of Swallowcliffe, approximately 3.2 km southeast of Tisbury and 18km west of Salisbury. The redline boundary sits within the grounds of Swallowcliffe Manor, which is a mid C17th property. There are numerous mature trees, tussocky grassland and managed lawns within close proximity, with the wider landscape comprising predominately agricultural land under a mix of pasture/silage and arable land. There is a wooded/scrub lined stream that runs down to the River Avon that lies 2.5km north.

Plate 1: Site Location

Data Search

Statutory and Non-Statutory Designated Sites

5.2 The Application Site lies within the consultation zone of the Chilmark Quarries Special Area of Conservation (SAC). This SAC comprises a number of individual sites across the wider landscape that support a larger population of greater horseshoe bats, barbastelle and Bechstein's bats, together with lesser horseshoe bat as a qualifying feature. As started within the Wiltshire Council planning guidance[4], '*the populations of bats supported by these sites are afforded very high levels of legal protection, placing significant duties on decision-makers to prevent damage to bat roosts, feeding areas and the routes used by bats to travel between these locations'.*

[4] DRAFT

5.3 Furthermore, the Application Site sits within the catchment of the River Avon SAC (and underlying River Avon System Site of Special Scientific Interest) that lies 205km north. The Proposed Development will not result in an increase in overnight accommodation or have any likely significant effects on the SAC. Therefore, no further assessment is required.

5.4 There are no designated sites within 2km of the Application Site. The closest is Prescombe Down SSSI and SAC that lies approximately 2.1km to the southeast. This SSSI is notified for its botanically rich chalk downland comprise nationally rare species, and invertebrate populations . The Application Site does not lie within a SSSI risk zone for this development type.

Habitats

5.5 There are numerous parcels of Priority Habitat within 500m of the site including deciduous woodland 50m to the northwest Swallowcliffe Wodd is a large area of ancient replanted woodland that lies 260m northwest. There are further parcels of deciduous woodland around Swallowcliffe village.

5.6 There is a small ornamental pond within the grounds that lies approximately 70m soputhwest of the site. No other waterbodies where identified within 250m of the site.

Species

5.7 There are three European Protected Species (EPS) licences within 2km of the site boundary.:

- Brown long-eared bat maternity roost (dated 2015-2025) – 800m west
- Lesser horseshoe and brown long-eared bat maternity roost (dated 2019-2030) – 850m west
- Barbastelle, Brandt's, common & soprano pipistrelle bat resting place (dated 2020-2025) – 1.45km southwest

5.8 There is no EPS licence for great crested newts or eDNA data 2km of the site.

Preliminary Ecological Appraisal

5.9 The Application Site is less than 25m^2 and comprises an area of tussocky grassland grassland to the rear of the existing stables. The grassland comprises false oat grass *Arrhenatherum elatius*, , with Yorkshire Fog *Holcus lanatus* and *Phleum pratense*. Given he time of year there are limited forbs but evidence of hogweed *Heracleum sphondylium*,, ground ivy *Glechoma hederacea,* cow parsley *Anthriscus sylvestris* , broad leaved dock *Rumex obtusifolius*, cleavers *Galium aparine*, creeping buttercup *Ranunculus repens* and ribwort plantain *Plantago lanceolata*. The habitat has been assessed as 'other neutral grassland' g3c in a moderate condition.

Plate 2: View across the Application Site

5.10 The UK Habitat Classification and Biodiversity Metric equivalents are provided in Table 1 below, along

Table 2: Baseline Habitats

UKHab	BNG SSM Metric	Justification
Other neutral grassland g3c	Grassland – other neutral grassland (moderate)	Grassland dominated by Lolium – forb poor. Moderate condition (passing B,C,D,E)

Table 3: Baseline Habitat Values

Habitat type	Area (m^2)	Strategic significance	Condition	Habitat units
G3c moderate	23	N/A	**Moderate**	**0.018**
Total habitat area	**23**			**0.018**

Plate 3: Baseline Habitats and Condition

Species

Bats – Foraging/Commuting Habitats

5.10 There are no buildings within the application boundary and no potential roost features were noted with the leylandii. The surrounding habitats are likely to offer foraging and commuting habitat for bats, including those associated with the Chilmark Quarry SAC. However, due to the small scale of the development and size of Application Site, the loss of a small area of grassland will not have a detrimental impact to the local bat population. No further survey or assessment is required but avoidance, minimisation and enhancement measures have been set out in Section 6.

Badgers

5.11 No evidence of badger was identified in the Application Site, or within the immediate area surrounding the Site. No further survey or assessment is required but standard precautionary measures are set out in Section 6.

Breeding Birds

5.12 The site offers limited opportunities for nesting birds, and no further survey or assessment is required. Avoidance, minimisation and enhancement measures have been set out in Section 6.

Amphibians - Great crested newts (GCN)

5.13 The wider site comprises some tussocky grassland and scrub that may offer some habitat for great crested newts. The Application Site lacks substantial vegetation that would offer shelter for great crested newts. Whilst there is a pond within 70m of the site, given the size of the site and scale of impact, it is considered highly unlikely that great crested newts will be affected by the proposals. This can be substantiated through the use of the Natural England rapid risk assessment, as illustrated below. This is also precautionary as it assumes that the pond is used for breeding.

Table 4: NE Risk Assessment

Component	**Likely effect** (select one for each component; select the most harmful option if more than one is likely; lists are in order of harm, top to bottom)	**Notional offence probability score**
Great crested newt breeding pond(s)	No effect	0
Land within 100m of any breeding pond(s)	0.001 - 0.01 ha lost or damaged	0.05
Land 100-250m from any breeding pond(s)	No effect	0
Land >250m from any breeding pond(s)	No effect	0
Individual great crested newts	No effect	0
	Maximum:	0.05
Rapid risk assessment result:	GREEN: OFFENCE HIGHLY UNLIKELY	

5.14 As such, whilst no further survey or assessment is required, a precautionary site clearance approach should still be adopted, as set out in Section 6 below.

Reptiles

5.15 As with the amphibians, the site is considered to offer limited potential for reptiles. No further surveys or assessment is required and standard practice site clearance and construction measures are recommended.

Other protected/notable species

5.16 There is no suitable habitat for dormice. Other species that could be present within the locality are hedgehogs. Again, standard best practice site construction methods should be adopted, where necessary, as detailed in Section 6.

6.0 Avoidance, Mitigation and Enhancement Measures

Mitigation and Enhancement Measures

6.1 In line with National and Local planning policies, developments should seek to ensure the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species populations. Therefore the following section sets out avoidance and mitigation measures that should be implemented, together with enhancement opportunities, with the aim of delivering a net gain in biodiversity, in line with the mitigation hierarchy.

Development Description

6.2 No further surveys are required to inform the application but appropriate measures to be implemented during construction are set out below.

Biodiversity Net Gain

6.3 The proposals will result in the loss of a small area of other neutral grassland. The biodiversity net gain regulations also include 'The Biodiversity Gain Requirements (Exemptions) Regulations 2024' which prescribe exemptions for categories of development to which biodiversity net gain does not apply. One exemption is:

- **Development subject to the de minimis exemption:** Development that does not impact a priority habitat and impacts less than 25 square metres (e.g. 5m by 5m) of onsite habitat, and 5 metres of linear habitats such as hedgerows.

6.4 This exemption is considered to be applicable to this application.

Mitigation Measures

6.5 Given the low ecological value of the site, there are minimal mitigation requirements but following measures should be implemented, as applicable:

- New lighting is not anticipated. Any new lighting must avoid mature vegetation and trees. This is of particular importance as the Application Site lies within the consultation zone of the Chilmark Quarry SAC. Any new lighting should be designed and adhere to the principles set out in the ILP Guidance Note 08/18 Bats and artificial lighting in the UK to avoid excessive light spill.
- The grassland should be strimmed down to 150mm, without impacting on the ground, with all arisings collected and then left for three days to allow for species to move away of their own accord.
- Foundation trenches and all excavations must either be covered overnight or must have scaffolding boards, or similar, placed within them to ensure that any animals that fall in are able to escape.
- Raise stored materials (that might act as temporary resting places for species such as amphibians and reptiles) off the ground, e.g. on pallets.
- Should any fencing be installed, occasional gaps must be left at the base (130 x 130mm) to allow movement of hedgehogs.

Habitat Enhancements

6.6 Following installation of the ASHP, the surrounding grassland should be overseeded with a more diverse seed mix such as Emorsgate EM1 Basic General Purpose Meadow Mixture[5] to improve floral diversity.

Species Enhancements

6.7 There are significant opportunities to provide species enhancements within the wider ownership boundary. Bat and bird boxes could be placed on mature trees within the grounds. Bat boxes should be placed on a S/SE orientation at least 3m in high. Bird boxes should be on a N/NW orientation. Log piles could also be created around the periphery of the site to offer habitat for specie such as amphibians and hedgehogs.

6.8 Invertebrate boxes could be placed on the existing fence line to the west of the ASHP or on the adjacent building.

6.9 In conclusion, the Application Site comprises habitats of low value and has negligible potential to support protected/notable species and in line with National and Local planning policies.

[5] EM1 Basic General Purpose Meadow Mixture - Emorsgate Seeds