LAND AT 117 HIGH STREET DILTON MARSH WESTBURY

CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN: BIODIVERSITY

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QUALITY ASSURANCE

This report has been prepared in accordance with the Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines for Ecological Report Writing (2nd Edition, December 2017).

The facts stated in this report are true to the best of our knowledge and belief, and any opinions expressed are held genuinely and in accordance with the accepted standards of the profession. ACD Environmental Ltd is a CIEEM Registered Practice.

Client:	Redcliffe Homes
Site/job:	Land at 117 High Street, Dilton Marsh, Westbury
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1 INTRODUCTION

1.1. ACD Environmental Ltd was instructed by Redcliffe Homes Ltd in December 2025 to produce a Construction Environmental Management Plan (CEMP): Biodiversity for a parcel of land at 117 High Street, Dilton Marsh, Westbury, Wiltshire BA13 4DP. This land is hereafter referred to as 'the Approved Development Site'.

1.2. Outline planning consent with some matters reserved for the development of up to 54 dwellings, including 30% affordable, and supporting infrastructure on land to the rear of 117 High Street, Dilton Marsh was allowed at appeal on 12th March 2025 subject to conditions. The planning appeal reference is **APP/Y3940/W/24/3352160** and the Wiltshire Council outline application reference is **PL/2023/01880**.

1.3. This report has been produced to address ecological elements of **Condition 12** of the planning consent. Condition 12 states:

"12. The development hereby approved shall not commence until a Construction and Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority. The CEMP shall include details of the following relevant measures:

(i) An introduction consisting of a construction phase environmental management plan, definitions and abbreviations and project description and location;

(ii) A description of management responsibilities;

(iii) A description of the construction programme;

(iv) Site working hours and a named person for residents to contact;

(v) Detailed Site logistics arrangements;

(vi) Details regarding parking, deliveries, location of any generators, temporary site accommodation and storage/loading;

(vii) Details regarding noise, dust and mud mitigation;

(viii) Details of the hours of works and other measures to mitigate the impact of construction on the amenity of the area and safety of the highway network;

(ix) Communication procedures with the local planning authority and local community regarding key construction issues – newsletters, fliers etc;

(x) Details of how surface water quantity and quality will be managed throughout construction;

(xi) Details of the safeguarding measures to deal with the following pollution risks:

a) the use of plant and machinery;

b) wheel washing and vehicle wash-down and disposal of resultant dirty water

c) oils/chemicals and materials

d) the use and routing of heavy plant and vehicles

e) the location and form of work and storage areas and compounds

f) the control and removal of spoil and wastes

(xii) Details of safeguarding measures to highway safety to include:

- *A Traffic Management Plan (including signage drawing(s))*
- *Routing Plan*
- *Details of temporary/permanent Traffic Regulation Orders*
- *pre-condition photo survey - Highway dilapidation survey*
- *Number (daily/weekly) and size of delivery vehicles.*
- *Number of staff vehicle movements.*

(xiii) In addition, the Plan shall provide details of the ecological avoidance, mitigation and protective measures to be implemented before and during the construction phase, including but not necessarily limited to, the following:

a) How the retained lowland meadow will be protected during construction works and detailed turf translocation method statement.

b) Phasing plan for habitat creation and landscape works including advanced planting proposals including pre-development provision of 'alternative space for recreation'.

c) Identification of ecological protection areas/buffer zones and tree root protection areas and details of physical means of protection, e.g. protection fencing.

d) Working method statements for protected/priority species, such as nesting birds, reptiles,

amphibians, roosting bats, badger and dormice.

e) Work schedules for activities with specific timing requirements in order to avoid/reduce potential harm to ecological receptors; including details of when a licensed ecologist and/or ecological clerk of works (ECoW) shall be present on site.

f) Key personnel, responsibilities and contact details (including Site Manager and ecologist/ECoW).

g) Timeframe for provision of compliance report to the local planning authority; to be completed by the ecologist/ECoW and to include photographic evidence.

Other areas of grassland outside of the lowland meadow to be lost under the Proposed Development Area would be subject to a further botanical survey by an appointed ecologist/ECoW to establish whether any further areas are worthy of translocation. The retained Lowland Meadow, including that to be subject to the translocation works, would be pegged out and subject to protective fencing and condition monitoring throughout the duration of construction works.

Development shall be carried out in strict accordance with the approved CEMP.

There shall be no burning undertaken on site at any time.

Construction hours shall be limited to 0730 to 1800 hrs Monday to Friday, 0730 to 1300 hrs Saturday and no working on Sundays or Bank Holidays.

The development shall subsequently be implemented in accordance with the approved details of the CEMP."

1.4. This CEMP: Biodiversity specifically addresses points xiii: a-g of Condition 12 and provides an update ecological baseline of the Approved Development Site. This report will also address the methods and mitigation measures to be followed during the site preparation and construction phases of the development within the Approved Development Site.

1.5. The highways related matters of Condition 12 have been addressed separately by Pegasus Group[1].

1.6. This report must be read in conjunction with the original Ecological Impact Assessment (Grass Roots Ecology, 2024[2]) and Biodiversity Net Gain (BNG) Assessment (Grass Roots Ecology, 2024[3]).

1.7. In addition, it is understood that proposals are likely to be revised in accordance with consultee comments and/or objections. Where changes are required, the ecological reports will require review

[1] Pegasus Group. 2026. CEMP. Document ref: P25-2046_TR01_CEMP.
[2] Grass Roots Ecology (2024). Ecological Impact Assessment. September 2024. Ref: 1321
[3] Grass Roots Ecology (2024). Statutory Biodiversity Metric. September 2024.

accordingly.

Competence

1.8. This report has been written by Charlene Watts, Ecologist at ACD Environmental Ltd and Qualifying member of the Chartered Institute of Ecology and Environmental Management (CIEEM). Charlene has experience of undertaking a wide range of surveys including UK Habitat Classification Surveys and Phase 2 surveys for protected species. Charlene has written various reports to present ecological findings and is experienced in Biodiversity Net Gain.

1.9. A Technical Review of this report has been undertaken in line with ACD Environmental Ltd's Quality Assurance procedures. The Technical Review was undertaken by Nicholas Jones who is the Head of Ecology and oversees all work undertaken by the Ecology Team. He has almost 18 years' experience working for commercial consultancy and specialises in European Protected Species (EPS) legislation and mitigation, holding Natural England Class Licences for barn owl, bats (Level 2) and great crested newt and is one of a small number of ecologists who is a Registered Consultant under the 'low impact' Bat Mitigation Class Licence (BMCL). He has represented ecology at a Hearing. He is a Full Member of CIEEM.

2 AIMS AND OBJECTIVES

Aims

2.1. The aims of this CEMP: Biodiversity and how this relates to specific sections of this report are as follows:

- Provide a summary of the previous ecology surveys and results in order to provide the context to subsequent recommendations (**Section 3.0**).
- Provide details of the roles and responsibilities for future actions (**Section 4.0**).
- Identification of 'Biodiversity Protection Zones' (BPZs) in respect of protected and notable species and habitats (**Section 5.0, Appendix 2**).
- Risk assessment and of potentially damaging construction activities (**Section 5.0 and 6.0**).
- Provide details on protection measures and protocols to be implemented during the construction phase with reference to habitats (**Section 5.0**) and species (**Section 6.0**).
- Provide details on monitoring and review (**Section 7.0**).
- Provide details of a schedule of works for timing of sensitive works to avoid harm to biodiversity features (**Section 7.0**).
- Provide conclusions to the points raised (**Section 8.0**).

Objectives

2.2. This report aims to achieve the following objectives throughout the construction phase of the project:

- To implement measures and methodologies to protect BPZs including dark corridors and buffer zones, and the species/habitats within these from unnecessary damage and disturbance.
- To deliver construction phase maintenance measures.
- To deliver construction phase monitoring and review measures.

3 BASELINE ECOLOGICAL CONDITIONS

3.1. The Approved Development Site comprises approximately 3ha of land. The Ordnance Survey Grid Reference for the approximate centre of the site is ST 84807 49923.

3.2. The Approved Development Site is located to the north of the High Street within the village of Dilton Marsh, Wiltshire. The location of the Approved Development Site is shown within **Image 1**.

Image 1: Approximate boundary of the Approved Development Site (red line).

3.3. The Approved Development Site has been subject to a range of ecological surveys, which were undertaken in 2017 by Danny Alder Ecology & Conservation, and in 2021, 2022 and 2024 by Grass Roots Ecology Ltd. The surveys undertaken at the Approved Development Site are summarised within **Table 1**.

Table 1: Details of field surveys.

Survey	Survey date
Extended Phase 1 Habitat Survey	April 2017 (Danny Alder Ecology & Conservation) November 2021 Various checks between April - October 2022 May 2024
Targeted botanical survey	April and June 2022 May 2024
Bat activity transect surveys	April - September 2022 (total five visits) April - September 2024 (total five visits)
Static bat monitoring surveys	April - September 2022 April - September 2024

3.4. An update ecological walkover was undertaken by ACD Environmental Ltd on 14th January 2026 to update the baseline, and to inform the recommendations within this CEMP: Biodiversity.

3.5. An update targeted botanical survey was also undertaken on 20th May 2026 to assess whether any grassland areas outside of the lowland meadow are worthy of translocation in line with Condition 12. Please refer to **Appendix 6** for the appended Botanical Technical Update by ACD Environmental Ltd.

3.6. A summary of the results of the update walkovers and previous surveys is provided below for context. For further details, please refer to the original EcIA (Grass Roots Ecology, 2024). The updated Baseline Habitats Plan has been provided within **Appendix 1** alongside site photographs from January 2026, which are provided within **Appendix 5**.

Designated Sites

Bath and Bradford-on-Avon Bats Special Area of Conservation

3.7. The Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC) is made up of a network of underground sites, including Box Mine Site of Special Scientific Interest (SSSI), Winsley Mines SSSI, Combe Down and Bathampton Down Mines SSSI, and Brown's Folly SSSI, all of which form an underground network that supports 15% of the UK's greater horseshoe *Rhinolophus ferrumequinum* bat population as well as supporting small numbers of hibernating Bechstein's *Myotis bechsteinii* bats; these features are the primary reason for the SAC designation. The SAC also supports populations of lesser horseshoe *Rhinolophus hipposideros* bat.

3.8. The Approved Development Site is located approximately 12km south-east of the Bath and Bradford-on-Avon Bats SAC at its nearest point (Winsley Mines SSSI) and is within the Bath and Bradford-on-Avon Bats SAC 'Core Area' buffer zone for impacts. The original EcIA (Grass Roots Ecology, 2024) also details that the Approved Development Site is within the 4km buffer zone of a greater horseshoe 'Core Roost' site, which is functionally linked to the Bath and Bradford-on-Avon SAC and must be duly considered.

3.9. The Approved Development Site is sufficiently distant from the Bath and Bradford on Avon Bat SAC that direct impacts from construction are considered highly unlikely. Therefore, no mitigation measures to protect the Bradford on Avon Bats SAC during construction are considered necessary.

3.10. However, the Approved Development has potential to impact bats associated with the Bath and Bradford-on-Avon SAC and surrounding functionally linked roosts during the construction phase due to increases in lighting, noise and vibrations. Mitigation measures to protect all commuting bats are provided in **Section 6**.

Salisbury Plain SAC/SPA/SSSI

3.11. The Approved Development Site lies approximately 3km west of the Salisbury Plain SAC, Special Protection Area (SPA) and SSSI. The Salisbury Plain upholds designations as a large chalk plateau supporting internationally important habitats, namely lowland juniper *Juniperus communis* scrub on chalk or heath, and semi-natural dry grassland, as well as protected species such as the marsh fritillary *Euphydryas aurinia* and internationally important populations of stone curlew *Burhinus oedicnemus*, hence the site retains a 6.4km impact buffer zone from surrounding developments.

3.12. The Approved Development Site is sufficiently distant from the Salisbury Plain SAC/SPA/SSSI that direct impacts from construction are considered highly unlikely. Moreover, whilst the Approved Development Site is within the buffer zone of impacts, the intent is to mitigate potential impacts derived from increased recreational pressure. This will be accomplished by means of an appropriate Section 106 planning obligation or Community Infrastructure Levy funded mechanism via Wiltshire Council in line with the Salisbury Plain SPA Mitigation Strategy[4]. Accordingly, there are no additional measures required within this CEMP: Biodiversity in relation to Salisbury Plain SPA/SSSI during the construction phase.

3.13. Notwithstanding the above, the measures outlined in **Section 6** to mitigate any potential lighting impacts on bats will also protect stone curlew associated with the Salisbury Plain SAC/SPA/SSSI.

Habitats

Lowland meadow

3.14. The Approved Development Site is predominantly comprised of grassland habitats. The majority of the Approved Development Site has been subject to intensive horse grazing with some areas cut for haylage as determined during the 2022 and 2024 surveys. During these surveys, an area of grassland to the north of the site was observed to support greater botanical diversity than the rest of the Approved Development Site, accounting for approximately 20% of the survey area within the red line boundary (**Image 1**).

3.15. Grassland species observed during previous surveys included common bent *Agrostis capillaris*, red fescue *Festuca rubra*, crested dogs-tail *Cynosurus cristatus*, rough meadow-grass *Poa trivialis*, sweet vernal-grass *Anthoxanthum odoratum*, cock's-foot *Dactylis glomerata* and false oatgrass *Arrhenatherum elatius*. A large range of herbaceous species including common sorrel *Rumex*

[4] Wiltshire Council 2024). *HRA and Mitigation Strategy for Salisbury Plain SPA (in relation to recreational pressure from residential development)*. June 2024. Available at: Evidence Base for Developer Contributions to Deliver Mitigation Measures for Development around Salisbury Plain SPA.

acetosa, selfheal *Prunella vulgaris*, meadow buttercup *Ranunculus acris,* goat's beard *Tragopogon pratensis*, common mouse ear *Cerastium fontanum*, yarrow *Achillea millefolium*, bugle *Ajuga reptans*, meadow vetchling *Lathyrus pratensis*, bird's-foot trefoil *Lotus corniculatus* and common knapweed *Centaurea nigra* were observed. As a result, and following discussions between Grass Roots Ecology, Wiltshire Council and Natural England, this species-rich grassland was determined as 'lowland meadow' priority habitat on a precautionary basis to ensure retention of the species-rich grassland habitat.

3.16. The May 2026 update botanical survey concluded that the area of lowland meadow classified in 2022 has remained broadly the same and the translocation recommendations remain valid. The meadow habitat was recorded with up to 20 species per m^2.

3.17. During the 2026 update surveys in January and May, it was observed that grazing on-site had ceased. Some rabbit grazing was observed however the relaxation of horse grazing has allowed the vegetation to return to the areas that were short and bare in 2022/2024. The implications for this with regards to protected species is discussed in **Section 6**.

Semi-improved grassland

3.18. Grasslands to the south of the lowland meadow were noted as less diverse with more frequent occurrences of nutrient enrichment, heavy poaching and disturbed/bare soil also present during the 2022 and 2024 surveys. Therefore, these grasslands were recorded as improved/semi-improved grassland. The Statutory Biodiversity Metric calculations have classified this habitat as 'modified grassland' in line with UKHabitat Classifications (UKHab) methodology[5].

3.19. In addition, areas indicative of seasonally damp soil were recorded in the north-eastern section of the Approved Development Site and in close proximity to the boundary flowing ditch/watercourse. Species recorded included field wood-rush *Luzula campestris*, silverweed *Potentilla anserina*, Yorkshire fog *Holcus lanatus* and occasional meadowsweet *Filipendula ulmaria*.

3.20. Areas indicative of high nutrient enrichment were scattered throughout the grasslands, comprising pioneering species such as goosefoot *Chenopodium* sp., broad-leaved dock *Rumex obtusifolius*, common nettle *Urtica dioica* and creeping thistle *Cirsium arvense*.

3.21. The May 2026 update botanical survey concluded that the area of lowland meadow classified in 2022 has remained broadly the same, however, some improvements to other areas of the grassland were observed. This included areas of g3c other neutral grassland previously classified as 'semi-improved' grassland / g4 modified grassland.

[5]UKHab (2023). UK Hab V2. Available at: https://ukhab.org/

3.22. Areas of other neutral grassland were recorded to the south and east of the existing lowland meadow. The other neutral grassland to the south of the meadow contained some indicator species of lowland meadow habitat, however it was recorded as 10-12 species per m^2 which was significantly less than the meadow. In addition, the area of grassland to the east of the meadow was noted as ecologically valuable and contained spring sedge *Carex caryophyllea* which is classed as near threatened on the UK red-list of vascular plants[6].

3.23. Notably, neither of these other neutral grassland habitats are considered ecologically valuable enough for mandatory translocations, however it is recommended that they are retained wherever feasible. As such, it is recommended that an area with lower forb densities is utilised as the translocation 'receptor zone' instead of the area in the south-west previously proposed (see **Appendix 3**), since this has been re-classified as other neutral grassland. It is also recommended that the spring sedge plants are rescued by digging out prior to works. For full details of the botanical update survey including methodology and results, please refer to the botanical technical note[7].

3.24. Overall, the Approved Development Site was split into 10 separate areas based on species composition during the targeted botanical survey, though these comprised modified grassland, other neutral grassland, and lowland meadow habitats (**Appendix 1**).

Hedgerows

3.25. A hawthorn *Crataegus monogyna* hedgerow was recorded along the western boundary comprising a low number of spaced hawthorn trees. This formed a gappy hedgerow that has been considered defunct since 2017.

3.26. Similarly, a hawthorn hedgerow was noted within the mid-eastern area of the Approved Development Site, adjacent to the wet ditch. This hedgerow was noted as approximately 30m in length, comprising spaced hawthorn trees that also formed a defunct hedgerow.

3.27. Short lengths of neatly trimmed ornamental hedgerows were noted in the south of the Approved Development Site associated with 117 High Street. These hedgerows comprised hawthorn, blackthorn *Prunus spinosa*, cherry laurel *Prunus laurocerasus*, privet *Ligustrum ovalifolium*, Leyland cypress *Cupressus × leylandii,* and lilac *Syringa vulgaris*.

3.28. In addition, a network of species-rich native hedgerows overhung the northern and eastern boundaries of the Approved Development Site during baseline surveys, comprising hawthorn *Crataegus monogyna*, blackthorn *Prunus spinosa*, elm *Ulmus procera*, field maple *Acer campestre*

[6] https://bsbi.org/learn/publications/other-books/a-new-vascular-plant-red-list-for-great-britain. Qualifies as NT on Criterion A as its geographic range (as measured by AOO) has declined by 28% over 3 generations. It was assessed as LC for the 2005 GB Red List.
[7] ACD Environmental Ltd. 2026. Botanical Techn Note. Document ref: REDC25060_Botanical_Technical_Note.

and hazel *Corylus avellana*. Non-native (but naturalised) horse chestnut *Aesculus hippocastanum* was also present. These species-rich native hedgerows were brought forward in the EcIA due to proximity to the Approved Development Site boundaries despite their placement beyond the red line boundaries.

3.29. The results of the 2026 update survey are in line with the above, with the addition of encroaching bramble *Rubus fruticosus* agg. scrub along the western boundary.

3.30. The mitigation outlined in this CEMP: Biodiversity to protect on-site habitats will also protect boundary hedgerows during the construction phase of the Approved Development.

Trees

3.31. There are various trees on-site, as well as overhanging the Approved Development Site, all of which are largely concentrated to the boundaries. Species composition is a mixture of native and ornamental species, including hawthorn, blackthorn, beech *Fagus sylvatica*, elder *Sambucus nigra*, horse chestnut, Lombardy poplar *Populus nigra*, hybrid poplar *Populus* sp. and tulip tree *Liriodendron tulipifera*.

3.32. The original ecological appraisal noted cultivar apple *Malus* sp. trees in the north-eastern corner of the Approved Development Site. A total of three apple trees were observed in this area during the 2026 update walkover. This is below the minimum threshold of five fruit trees and is therefore not classified as an orchard. A fourth tree appeared to have been present in previous years, however this has since been removed and was recorded as a deadwood stump during the update walkover. The deadwood stump correlates with tree T27 as shown on the Tree Protection Plan by Bosky Trees (2023)[8], which was likely removed due to its determination as an unsafe 'U' category tree in arboricultural reports.

3.33. Mitigation measures to protect trees during the construction phase are outlined in **Section 5**. The importance of trees in relation to protected species is discussed in below.

Wet ditch

3.34. A ditch network runs along the northern boundary of the Approved Development Site and southward from the north-eastern boundary of the Approved Development Site into the interior of the Approved Development Site. The ditches contained flowing water at the time of the survey in 2022 and were noted as approximately 1-2m in width, and there were stretches of the ditch network totally devoid of vegetation during these baseline surveys. Where vegetation was recorded, this was limited to

[8] Bosky Trees (2023). *Arboricultural Impact Assessment and Tree Protection Plan*.

fool's-water-cress *Helosciadium nodiflorum* and great willowherb *Epilobium hirsutum*.

3.35. The ditch network contained slow flowing water during the 2026 update walkover, particularly along the northern boundary of the Approved Development Site, and its condition was largely in line with the original EcIA. However, the water extending southwards towards the interior of the Approved Development Site was almost still in places, in contrast to the baseline assessment. The implications of this with regards to protected species considerations are further discussed below.

Other

3.36. There were two built structures on-site at the time of the 2022 surveys; one comprising a timber cladded frame and corrugated slanted roof, and the other was a modified metal storage trailer with a timber frame and ply-sheeted extension.

3.37. There was one temporary built structure noted on-site during the update 2026 survey comprising a series of wooden and corrugated metal sheets as the frame and a slanted tarpaulin roof. This structure was considered to be of negligible intrinsic value and offers negligible opportunities for protected species.

Fauna

3.38. For ease of reference, descriptions of relevant fauna have been provided alphabetically, below.

Badger

3.39. Evidence of badger *Meles meles* activity was confirmed in 2017 comprising an active sett with three entrance holes. The sett was located off-site, adjacent to the northwestern corner of the Approved Development Site and on the opposite side of the ditch. Although off-site, the sett was noted as close to the Approved Development Site boundary.

3.40. No signs of recent activity were observed during surveys by Grass Roots Ecology, and it was considered that the Approved Development Site was used by badger on an occasional basis only in the EcIA.

3.41. During the 2026 update survey, the off-site badger sett holes were visible, and it was noted that they tunnelled away from the Approved Development Site.

3.42. No badger setts have been found within the Approved Development Site to date, however various well-worn mammal paths were noted throughout the Approved Development Site, and it is considered highly likely that badgers will be utilising the Approved Development Site for commuting and foraging.

3.43. Due regard must be given to the potential for badgers to be present within the Approved Development Site given their known presence within the local area. Measures to protect badgers are outlined within **Section 6**.

Bats

Roosting bats

3.44. The EcIA by Grass Roots Ecology notes that no trees with bat Potential Roost Features (PRFs) were present during surveys in 2022 and 2024.

3.45. In contrast, the 2026 update survey identified three apple trees within the Approved Development Site with bat PRFs. Notable features identified were predominantly knot holes following previous limb pruning (see **Appendix 5**).

3.46. With reference to the Arboricultural Impact Assessment and Tree Protection Plan by Bosky Trees (2023), the tree numbers corresponding with these apple trees are T28, T29 and T30.

3.47. All trees are scheduled to be removed to facilitate the Approved Development. Therefore, due regard must be given to the potential for roosting bats to be present within T28, T29 and T30 given the presence of potential roosting features. **Section 6** outlines precautionary measures of working to account for the unexpected presence of bats.

Foraging and commuting bats

3.48. The Approved Development Site provides suitable habitat for foraging and commuting bats in the form of hedgerows, trees, meadow and wet ditches. The network of linear features also acts as a green corridor, providing connectivity for commuting bats to and from high-quality habitats such as woodland and pasture in the wider area.

3.49. A series of bat activity surveys were undertaken between April and September 2022 and 2024, utilising both walking transect and static monitoring methodologies. The surveys recorded activity within the Approved Development Site by greater horseshoe *Rhinolophus ferrumequinum*, lesser horseshoe *R. hipposideros*, common pipistrelle *Pipistrellus pipistrellus*, soprano pipstrelle *P. pygmaeus*, serotine *Eptesicus serotinus*, noctule *Nyctalus noctula* and *Myotis* spp. Overall, activity was dominated by common pipistrelle for both mobile transect and static surveys.

3.50. Notably, greater horseshoe and lesser horseshoe bats are Annex II species, with greater horseshoe forming the primary reason for the designation of Bath and Bradford on Avon Bats SAC (along with Bechstein's bat presence) and lesser horseshoe one of the qualifying features (though not the primary reason). These bat species are rare but are known to be present in Wiltshire.

3.51. The bat activity surveys undertaken by Grass Roots Ecology identified that horseshoe bat activity was largely concentrated to the northern and western boundaries of the Approved Development Site. Moreover, the timing of recorded bat calls appeared to coincide with use of the Core Roost site situated within 4km to the east of the Approved Development Site. It was therefore concluded that greater and lesser horseshoe bats were predominantly utilising the Approved Development Site as a commuting route from the Core Roost site to nearby cattle-grazed pasture and woodland.

3.52. All horseshoe and *Myotis* sp. bats are particularly intolerant of artificial lighting, and due regard must be given to the presence of these species during the construction phase. Measures to protect all commuting and foraging bats are provided in **Section 6**.

Birds

3.53. The trees and hedgerows within the Approved Development Site provide suitable habitat for nesting birds, and all habitats within the Approved Development Site are likely to be utilised by a variety of foraging birds.

3.54. During the various visits to the Approved Development Site by Grass Roots Ecology, the following bird species were noted as heard and/or seen: dunnock *Prunella modularis*, robin *Erithacus rubecula*, wren *Troglodytes troglodytes*, house sparrow *Passer domesticus*, magpie *Pica pica*, blackbird *Turdus merula*, chaffinch *Fringilla coelebs*, great tit *Parus major*, swallow *Hirundo rustica*, jackdaw *Corvus monedula*, woodpigeon *Columba palumbus*, blue tit *Cyanistes caeruleus* and goldfinch *Carduelis carduelis*.

3.55. Habitats with suitability for nesting birds are scheduled for removal. This includes three trees and small sections of hedgerow. Precautionary measures of work with regards to nesting birds are outlined within **Section 6** below.

Great crested newt

3.56. The EcIA concluded that the Approved Development Site did not support suitable aquatic habitat for great crested newt *Triturus cristatus* due to the flow of the wet ditch, inhibiting any breeding opportunities for this species.

3.57. A search on the Multi-Agency Geographical Information for the Countryside (MAGIC)[9] website shows no ponds within 250m of the Approved Development Site, which is the typical terrestrial dispersal range for this species[10]. However, as discussed in the EcIA, Wiltshire & Swindon Biological Records Centre returned an unverified record for great crested newt(s) approximately 90m to the

[9] DEFRA. MAGIC Maps. Available at: https://magic.defra.gov.uk/
[10] Langton, T., Beckett, C., and Foster, J. (2001). *Great Crested Newt Conservation Handbook*. Froglife, Halesworth.

east of the Approved Development Site. It was concluded that this was likely to be a residential pond nearby as no pond could be seen on OS maps. Attempts to locate and survey the pond were not made due to project sensitivities, therefore, presence of great crested newts within the Approved Development Site could not be ruled out.

3.58. During the 2026 update survey, the Approved Development Site was identified to support suitable aquatic and terrestrial habitat for great crested newts. The ditch protruding south and into the interior of the Approved Development Site was almost still in places and considered suitable for great crested newts. In addition, grazing appears to have ceased within the Approved Development Site, and the grassland was noted as long and tussocky, providing suitable terrestrial habitat for great crested newts.

3.59. The Approved Development Site is situated within an overlap of amber and green risk zones for great crested newts[11] and is connected to surrounding amber risk zones. The colour coded zones represent likely presence of great crested newts, with amber indicating important connecting habitat that aids natural dispersal, with great crested newts likely to be present, and green indicates less suitable habitat with sparsely distributed great crested newts.

3.60. The Approved Development Site has low potential to support great crested newts during both terrestrial and aquatic phases of their life cycle. The meadow translocation, removal of hedgerows, and loss of *c.*50m of the ditch network have potential to impact this species should any individuals be present.

3.61. As such, mitigation measures are discussed in **Section 6** to protect great crested newts during the construction phase of the Approved Development.

Other mammals

3.62. There is a concrete platform in the eastern section of the Approved Development Site, and a hole was observed underneath this during the 2026 update survey (**Photograph 1**). The species responsible could not be concluded at the time of the survey, though it was considered highly unlikely to be badger due to its size and shape.

[11] Natural England Open Data Geoportal. (2023). *great crested newts Risk Zones (Swindon and Wiltshire).* Available at: great crested newts Risk Zones (Swindon and Wiltshire) | Natural England Open Data Geoportal.

Photograph 1: Hole beneath a concrete platform in eastern section of Approved Development Site.

3.63. The Approved Development Site as a whole has potential to support mammals, such as fox, rabbits *Oryctolagus cuniculus* and rodents e.g. mice and voles. Although these species are not subject to legal protection in terms of their conservation status, they are subject to protection from cruelty under the Wild Mammals Protection Act and the Animal Welfare Act 2006 (hedgehog *Erinaceous europaeus* is also protected under this legislation). Therefore, care must be taken at all times during clearance/groundworks to ensure any small mammals that may be present are not harmed.

<u>Otter and water vole</u>

3.64. The wet ditch network within the Approved Development Site was assessed for signs of use by otter *Lutra lutra* and water vole *Arvicola amphibus* during both baseline and update surveys.

3.65. No evidence of otter or water vole have been identified during any surveys to date. Grass Roots Ecology (2024) discounted use of the ditch network by water vole due to the lack of sufficient bankside vegetation and because the ditches likely did not hold water for sufficient periods. That being said, otter underwent further consideration since commuting and foraging by otter could not be ruled out.

3.66. The results of the update survey are largely in line with baseline surveys; however, it was noted that the ditch running along the northern boundary of the Approved Development Site was sufficiently deep and vegetated for use by water vole.

3.67. Suitable mitigation measures are provided in **Section 6** to ensure otters are not harmed or adversely impacted by the Approved Development. These measures will also protect any potential water voles.

Reptiles

3.68. Areas of rank vegetation were noted along the Approved Development Site boundaries and considered suitable for slow-worm *Anguis fragilis* and grass snake *Natrix helvetica* during baseline surveys. Other areas were considered unsuitable due to intensive grazing across the Approved Development Site, and due to the limited extent of suitable reptile habitat, further surveys were not scoped in for the EcIA.

3.69. The 2026 update survey concluded that the grazing regime had ceased as grasslands across the Approved Development Site were long and tussocky, thereby providing suitable reptile habitat throughout, as opposed to along the boundaries only.

3.70. Similar to great crested newts, construction activities such as the meadow translocation and hedgerow removals have potential to impact reptiles should any individuals be present.

3.71. The mitigation measures outlined in **Section 6** to protect great crested newts will also protect reptiles.

4 ROLES AND RESPONSIBILITIES

4.1. This report should be read in conjunction with other environmental reports for Land at 117 High Street, Dilton Marsh.

4.2. The overall responsibility for the design of the scheme under The Construction (Design and Management) Regulations 2015 is with the Principal Designer.

4.3. The implementation of this CEMP: Biodiversity is the responsibility of the Project Manager and/or Contractor on behalf of the Developer, who will collectively be responsible for ensuring that the appointed subcontractors and all site staff are aware of the ecological constraints and the distribution of this CEMP: Biodiversity document accordingly.

4.4. An appropriately qualified Ecological Clerk of Works (ECoW) will be appointed during the construction phase. Reference is made within this document as to when the ECoW would need to be present in order to implement mitigation. The ECoW will also be required to take photographic evidence and include this within the compliance report for submission to Wiltshire Council following the meadow translocation and within three months following the commencement of construction works.

4.5. The appointed Site Manager will be responsible for the day-to-day implementation of the CEMP: Biodiversity and ensuring that the site staff and contractors adhere to the measures set out within the CEMP: Biodiversity. The Site Manager will also be responsible for identifying when the ECoW is required based upon the recommendations in this report.

5 PROTECTION MEASURES - HABITATS

5.1. The Approved Development will result in the loss of 2.32ha grassland, 19m of hedgerow, and a total of three trees (not including T27 that has already been removed).

5.2. This section details the practical measures to avoid or reduce impacts on habitats within the Approved Development Site. This includes physical measures, timing restrictions, sensitive working practices and biosecurity protocols.

5.3. This CEMP: Biodiversity must be read in accordance with the forthcoming Landscape and Ecological Management Plan (LEMP), which will detail site management measures during the operational phase.

General Measures

5.4. During the construction phase, the following general measures will be implemented to ensure protection of retained habitats on and off-site:

Pollution prevention:

- The works will be undertaken in accordance with Guidance for Pollution Prevention (GPPs)[12] to prevent pollutants from entering any terrestrial and aquatic habitats, which includes the on-site and off-site habitats, and to appropriately deal with any pollution incidents should they arise.
- All general construction material and chemicals will be carefully stored within the site compound/s.

Pollution prevention - chemical contamination

- Should any chemical spills occur then they must be traced, recorded and addressed in compliance with COSHH.
- A spill kit must be available at all times.
- Information on dealing with chemical spills is contained in PPG21 'Dealing with Spills' and a copy of this guidance should be kept on-site.
- Any refuelling of vehicles or any use of chemicals is to be undertaken within designated areas

[12] Net Regs (2021). *Guidance for Pollution Prevention*. Version Available at: guidance-for-pollution-prevention-1-2022-update.pdf

on an impermeable surface.

- Should any drums be damaged or leaking then these should be removed from the site immediately and disposed of in an appropriate manner.

Pollution prevention - noise:

- A noise control plan will be implemented following best practice guidelines, to include measures such as use of silencers or mufflers on plant and machinery; use of the quietest possible plant; and minimising on-site cutting operations and other noisy activities through off site fabrication where possible.

Pollution prevention - dust:

- Any exposed areas of soil and piles of sand, soil or other small particle materials should be kept damp and/or covered as appropriate whilst not being worked on, especially on days of high winds.

- Where required, geotextile membrane will be installed on the Heras fencing surrounding the site.

- Dust suppression is to be used across the Approved Development Site as appropriate, running surfaces are to be kept clean and watered down where required. Dust generation is to be reduced by suppression systems (water, air extraction, etc.) in accordance with each task as appropriate to suit conditions.

Groundworks

- If soil is imported to the Approved Development Site, it must be sourced from an approved supplier, and a record should be made as to where the imported soil is distributed. If any soil is imported to the Approved Development Site, areas where topsoil is used must be checked annually between May and September. The check will comprise a search for invasive species, such as Japanese knotweed *Fallopia japonica*.

Waste management

- Materials on-site must be recycled within the completed development/recycled at suitable facilities off-site/disposed of at suitable facilities off-site as appropriate with no dumping of waste on or adjacent to the Approved Development Site under any circumstances.

- Waste from the construction works will be placed into skips and transported to waste

recycling centres.

- Pallets will be kept and recycled for future use and collected for recycling by contractors where required. Timber waste will be recycled for use on the Approved Development Site and where appropriate collected in dedicated skips.

- Plasterboard will be separated within dedicated skips.

5.5. Further details of local highway mitigation measures can be found in the Construction Environmental Management Plan by Pegasus Group.

Retained Habitats

5.6. As shown in the Eco Parameters Plan (**Appendix 3**), the Approved Development will retain lowland meadow, modified grassland, hedgerows, trees, and the wet ditch network.

Lowland meadow

5.7. Most of the lowland meadow habitat (0.67ha) will be retained *in situ* and enhanced with sensitive management practices during the operational phase as prescribed in the LEMP.

5.8. All retained lowland meadow, including the area that will be subject to translocation, must be protected during the construction phase to prevent any damage or disturbance of this habitat. The lowland meadows will be pegged out using markers and protected with Heras fencing (or similar) to avoid access and trampling/ damage by personnel, vehicles and heavy plant machinery.

5.9. The retained lowland meadow must also undergo regular condition monitoring during the construction phase of the Approved Development (see **Section 7**).

5.10. The remaining *c.*232m^2 of lowland meadow will be translocated to an area in the south of the Approved Development Site (receptor site – see **Appendix 2**), approximately 20m east of the area proposed in the approved Eco Parameters Plan (**Appendix 3**). Please see below for the lowland meadow translocation methodology.

Meadow translocation - method statement

5.11. The translocation will be timed to avoid peak summer, when plants are flowering and the potential for drought conditions could jeopardise the success of translocated turves. In addition, peak winter, when excessive wet and cold conditions are likely, will also be avoided. As such, it is recommended for the meadow translocation to take place in late summer to autumn (August - November).

5.12. The receptor site will be ploughed and stripped in preparation for the planting works.

5.13. The lowland meadow to be translocated (donor site) will be cut and lifted as turves for a direct translocation with minimal damage and fragmentation to existing plant communities.

5.14. Firstly, the donor site will be mown to 15cm in a directional manner, starting at the centre and moving outwards. The grassland should then be left for 24 hours to allow any inhabitant wildlife that may be present to move out of the area into surrounding habitats. The grassland can then be cut to 50-75mm above ground level and arisings removed.

5.15. Within 24 hours following grassland cutting, the soil will be cut into 1.5m rows using an excavator and bespoke turf cutting/lifting bucket. The turves will be cut to a maximum depth of 30cm and minimum of 10cm so that the topsoil layer is fully retained as this will contain majority of the seed bank. Due care must be taken to minimise turf slump and soil crumb at the cut edge.

5.16. Following cutting, the turves will be lifted using the excavator and bespoke bucket and placed on a large trailer or flatbed in preparation for transportation to the receptor site.

5.17. If transportation of turves will not be undertaken on the same day, turves will be stored carefully with use of polythene liner (or similar) to maintain structural integrity of the turves. Turves must not be stored for any longer than 48 hours.

5.18. A separate bespoke bucket with a large flat base will be used to unload turves from the trailer/flatbed and load onto the receptor site; the flat base will support the turves during translocation and will also be used to press down the turves once they are in place.

5.19. Each turf will be laid directly next to one another with a distance of no more than 50mm between each turf.

5.20. Any remaining soil that has broken off from translocated turves will be used to infill gaps throughout the receptor site.

5.21. The translocation will be undertaken following a logical order to minimise trampling over the laid turves. Moreover, a single access route will be used by heavy machinery to limit the extent of trampling across the grasslands and no heavy machinery is to be driven on meadow grassland habitat at any time.

5.22. The translocated meadow turves must be regularly watered and inspected for signs of distress.

5.23. A suitably qualified ecologist/ECoW will be present throughout the translocation.

Spring sedge translocations – method statement

5.24. A translocation of the spring sedge plants will take place prior to the commencement of the construction phase.

5.25. The plants will be translocated to a suitable area of retained grassland in the south of the Approved Development Site near to the lowland meadow receptor area (see **Appendix 2**). Initially, individual plants will be excavated with a minimum 20cm root ball. Following this, the turf and topsoil that supported and surrounded the plants will be translocated into the receptor area to indoctrinate the soil with important mycorrhizal fungal communities and minimize enrichment. Following this, the plants will plug-planted back into the turf.

5.26. This methodology will minimise any potential harm to the conspicuous plants and increase capture of dormant plants in the turf, whilst ensuring the soil conditions and seed bank remain intact.

Hedgerows and trees

5.27. All retained hedgerows and trees have potential to be damaged during works throughout the construction phase of the Approved Development. Therefore, all retained hedgerows and trees will be protected in line with the Tree Protection Plan by Bosky Trees (drawing ref TPP-1).

5.28. As such, Root Protection Zones (RPZs) will be established around trees to be retained in line with BS5837:2012, through use of Heras fencing or similar.

5.29. The protective fencing must be installed before any heavy plant machinery is used on-site and will remain in place until completion of the construction phase, unless these works take place under supervision.

5.30. It should be noted that, although not listed on Schedule 9 of the Wildlife & Countryside Act 1981 (as amended)[13], cherry laurel is considered invasive in the absence of management and must not be allowed to spread. In addition, Leyland cypress is a dominant species and must be carefully managed to minimise growth and over shading of other species.

5.31. Where tree removal or pruning is required, such works are to be undertaken in accordance with the British Standard BS3998:2010 'Tree Work Recommendations', by recognised tree contracting companies from the Arboricultural Association's list of registered contractors. Proof of experience and insurance provision will be required, and any timing restrictions detailed for the protection of fauna will be adhered to.

[13] Invasive non-native plants (Section 14) on Schedule 9 of the Wildlife & Countryside Act 1981 (as amended).

5.32. The retained hedgerows and trees and their RPZs are classified as Biodiversity Protection Zones (**Appendix 2**) and will be protected throughout the construction phase through fencing as outlined above. During construction, the vegetation behind protective fencing will be unmanaged and provide a refuge for wildlife.

Wet ditch

5.33. In the absence of appropriate measures, there is potential for the retained wet ditch network to be impacted by construction activities such as pollution.

5.34. No chemicals should be used in/near the ditches.

5.35. All chemicals should be refilled at least 2m from any/ all ditches, where this is not possible all chemical refills must be done on a spill mat.

5.36. If any spills occur and enter the ditches, they must be reported and appropriately cleaned up.

5.37. Full pollution prevention measures are provided in **Section 6**.

6 PROTECTION MEASURES - SPECIES

General measures

6.1. General measures will be adopted to safeguard any wildlife that may be present on the Approved Development Site during site preparation and construction phases. These are as follows:

- BPZs as shown within **Appendix 2** will be protected behind Heras (or other suitable) fencing at all times. Contractors will not be permitted to enter BPZs unless in exceptional circumstances.
- Machinery and building materials must not be stored within or in close proximity to BPZs. Where possible machinery and building materials should be stored in containers, on raised pallets or on areas of hardstanding.
- Heras fencing (or similar) protecting BPZs will be subject to weekly checks by the site manager to ensure this is still in place and is not damaged or compromised.
- Any excavations will be covered at night. Where this is not possible a means of escape must be provided. This could simply be in the form of a roughened plank of wood placed in the trench as a ramp to the surface.
- Excavations must be managed to avoid the formation of temporary waterbodies.
- All temporarily exposed pipes must be capped overnight to prevent animals gaining access and later becoming trapped.
- 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 construction site must be left as tidy as possible at the end of each working day. Food and litter must not be left out overnight.

Badger

6.2. An updated site walkover is required within three months prior to the commencement of works to ensure that there continues to be no evidence of badger on-site.

6.3. Throughout the construction phase, any trenches/pits will be inspected each morning to ensure no animals 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 should 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.

6.4. The storage of topsoil or other 'soft' building material within the construction site will be given careful consideration. Badgers may readily adopt such mounds as setts. To avoid this, mounds will be kept to a minimum and any essential mounds will be subject to daily inspections.

Bats

Roosting bats

6.5. Trees T28, T29 and T30 have potential to support roosting bats due to the presence of various knot holes. All trees will be felled to facilitate the Approved Development. In the event that bats had begun roosting in any of these trees, felling could lead to injury/death of bat(s) and destruction of a bat roost.

6.6. To eliminate the risk of accidental injury being caused to bats during the felling of T28, T29 and T30, these trees will be subject to pre-felling endoscope surveys undertaken by a Level 2 licenced bat ECoW. Providing no bats or evidence of bats are found within any trees, felling will take place within 24 hours under supervision of an ECoW, using soft-felling techniques where possible. In the event that a bat or evidence of bats is found during the pre-felling checks, works will stop immediately, and a bat EPS licence secured.

Foraging and commuting bats

6.7. Bat activity surveys confirmed use of the Approved Development Site by species particularly intolerant of light pollution, namely greater horseshoe, lesser horseshoe and *Myotis* spp. bats. Lighting measures will be implemented with regards to construction site lighting to minimise light spill onto the surrounding habitats and protect commuting/foraging habitat for bats as follows:

- A dark buffer zone must be maintained across the Approved Development Site's boundaries, particularly the northern and western boundaries, to maintain sufficient dark foraging habitat for all bat species, including both horseshoe and *Myotis* spp. that are less tolerant of artificial light pollution. That being said, lighting requirements during the construction phase will likely be during winter months when bat activity will be minimal due to hibernation/reduced activity.

- All works will be undertaken between 07:30 to 18:00 Monday to Friday and 07:30 to 13:00 on Saturdays in accordance with Condition 12 of the planning consent. Temporary and task-specific lighting may be required during working hours in the winter months.

- No artificial lighting will be left on outside of working hours.

- Where security lighting is required, it is recommended that these are motion-activated with hooded luminaires, and these must be directed away from vegetated boundaries and trees. 'Warm white' light (~2700-3000K, >550nm peak wavelength) with no UV component should be used to avoid the most disruptive wavelengths to bats.

- Where temporary lighting is required, this will be minimised to task related lighting only must only be used if absolutely required.

- All lighting must be directed within the construction site to minimise light spill on adjacent habitats.

6.8. These lighting measures will also protect nocturnal wildlife that may occur within the Approved Development Site.

Birds

6.9. There is the potential for nests to be destroyed during the construction phase during felling of trees and removal of hedgerows. There is also the potential for nesting birds to be disturbed by construction noise, dust and vibration.

6.10. Installation of fencing to protect BPZs will prevent accidental destruction of bird's nests beyond the construction zone.

6.11. To avoid impacts on nesting birds, trees and sections of hedgerow should be cleared outside of the bird nesting season, which is generally considered to be March - August inclusive.

6.12. Where this is not feasible, trees and hedgerows scheduled for clearance must first be thoroughly checked by a suitably qualified ECoW within 48 hours prior to any work starting. If a nest is identified, the ECoW will establish a suitably sized buffer around the nest with high visibility tape (usually 5m, dependent on species). No works will be permitted within the buffer, which must remain in place and undisturbed until the ECoW has confirmed that the young have fledged and that the nest is no longer in use. This work is to be undertaken using hand tools only. If a nest is identified in the absence of the ECoW, works will stop immediately and advice from a suitably qualified ecologist sought immediately.

6.13. The provision of bird boxes must be kept in mind during the construction phase of the development. As many of the boxes specified are integrated boxes, they must be installed during the construction phase and are difficult/not possible to fit retrospectively. It is recommended that nesting provision is included within the architect's drawing to ensure boxes are installed as required.

Great crested newt/reptiles

6.14. The Approved Development Site contains a wet ditch network and is considered of importance at the site-level only. The ditch network was considered unsuitable for great crested newts in 2022 and 2024 due to flowing water, which inhibits suitability for breeding great crested newts. Moreover, the grassland was subject to intensive grazing and subsequently unsuitable for both great crested newts and reptiles with the exception of rank vegetation along the Approved Development Site boundaries.

6.15. The grazing regime across the Approved Development Site has since ceased, and there were sections of the wet ditch network that were almost still. Therefore, the presence of low numbers/individual great crested newts and reptiles throughout the Approved Development Site cannot be ruled out.

6.16. Approximately 50m of the ditch network will be lost to facilitate the Approved Development. These works to the ditch network must proceed with caution to ensure no common amphibians/great crested newts/reptiles are harmed during excavations or other works. Works to the ditch network should be undertaken outside of the great crested newt breeding season, which is April - June inclusive. Moreover, they will be checked for presence/absence of protected species by a suitably qualified ecologist within 24 hours preceding the works.

6.17. If any common amphibians are found, they will be moved to retained grasslands outside of the construction zone. In the unlikely event any great crested newt are found, works must stop and Natural England contacted/an EPS licence secured.

6.18. In addition, any grasslands scheduled for clearance or translocation must be mown between March – October inclusive and using a phased approach whereby the grassland is first cut to 15cm in a directional manner, starting at the centre and moving outwards. The grassland should then be left for 24 hours to allow any common amphibians/great crested newts/reptiles (and other fauna such as small mammals) that may be present to move out of the area into surrounding habitats. The grassland can then be cut down to ground level, again using directional cutting. Cuts to ground level should be under supervision of an ECoW. Cuts should only take place on dry days when temperatures are above 10°C. Following the cut to ground level, a soil strip can take place as necessary.

6.19. In addition to the phased approach outlined above, the meadow translocation will be undertaken under supervision of an ECoW, which will also protect any common amphibians/great crested newts/reptiles should they be found during the works.

6.20. As outlined above, maintaining BPZs will ensure any individual/small numbers of common amphibians/great crested newts/reptiles that may be present within the area have sufficient shelter

during construction.

Other mammals

6.21. A hole was observed beneath a concrete platform in the eastern section of the Approved Development Site (**Photograph 1**).

6.22. This hole must therefore undergo a pre-commencement check within three months prior to the commencement of works.

6.23. In addition, the concrete platform should be removed sensitively. This could entail the use of machinery to slowly lift/flip the concrete slabs upwards to reveal the underneath without crushing. This will ensure no inhabitant animals would be harmed, should they be present.

6.24. In the unlikely instance that a protected species is found (e.g. badger), works must stop, and an ecologist contacted immediately.

Otter and water vole

6.25. The precautionary measures outlined above to protect great crested newts and reptiles during works to the wet ditch network will also protect otter and water vole should they be present.

6.26. In the unlikely event any otter/water vole or features associated with these species are found, works within 30m of the animal or identified feature must stop, and advice from a suitably qualified ecologist sought immediately.

7 SCHEDULE OF WORKS

7.1. The work schedule relating to ecology during the construction phase is set out within **Table 2** below. For the full planting schedule relating to habitat creation and landscape works, please refer to the forthcoming soft landscape proposals.

7.2. In the instance that any deviance from the schedule below is required, the Developer and/or the Site Manager is to contact an ecologist at ACD Environmental Ltd to confirm agreement to any amendments.

7.3. A written record should be kept of actions taken to protect the biodiversity at the Approved Development Site during the construction phase. This should include a record of ECoW presence, supporting photographs, any discovery of protected/notable species and actions taken to protect wildlife and their habitats. If required, these documents should be submitted to Wiltshire Council.

7.4. The colour coding within **Table 2** is as follows:

	Suitable months - no ECoW supervision required
	Suitable months - ECoW supervision/ecologist presence required
	Unsuitable months

7.5. Where ECoW presence is required, the relevant species/species group consideration is demonstrated as follows:

	Badger/hedgehog
	Nesting birds
	Roosting bats
	Amphibians
	Reptiles
	Otter/water vole
	Lowland meadow/ plants

Table 2: Schedule of works during construction showing suitable months and when ECoW supervision/ecologist presence will be required.

Action	J	F	M	A	M	J	J	A	S	O	N	D
PRE-CONSTRUCTION PHASE												
Within three months prior to the start of construction, an ecologist will carry out an update site walkover to check for any evidence of new badger setts and assess the inconclusive hole identified beneath the concrete platform within the Approved Development Site.												
Updated botanical assessment of the Approved Development Site to assess whether any additional grassland areas are worthy of translocation. Translocation will follow accordingly (see below).												
Installation of Heras fencing (or similar) to protect RPZs and BPZs. This fencing will undergo weekly checks to ensure it remains in place.												
SITE CLEARANCE WORKS												
Pre-felling endoscope survey undertaken by a Level 2 licenced bat ECoW of tree T28, T29 and T30.												
Clearance of T28, T29 and T30 and sections of hedgerow within the Approved Development Site should be undertaken outside of bird nesting season. Where this is not feasible, habitats will undergo nesting bird checks within 48 hours prior to clearance.												
Cutting of grasslands to be cleared/translocated using phased approach. First cut grassland to 15cm starting at centre and moving outwards. Leave for 24 hours and then cut to ground level (second cut to be under supervision of ECoW). Cuts to take place on warm (≥10°C), dry days.												
Lowland meadow translocation in accordance with method statement and under supervision of ECoW. Peak summer and winter conditions (e.g. drought, flooding, and frost) must be avoided to maximise chances of translocation success.												

Spring sedge individual plant translocations in accordance with method statement and under supervision of ECoW. Peak summer and winter conditions (e.g. drought, flooding, and frost) must be avoided to maximise chances of translocation success.												
Where work is proposed to the wet ditch network, ditches will be checked by the ECoW within 24 hours of commencement of works to ensure that there is no presence or evidence of water vole/otter/great crested newt/reptiles.												
THROUGHOUT CONSTRUCTION PHASE												
Monthly attendance by an ecologist to monitor the condition of lowland meadow habitats (retained and translocated). To be reviewed following 12 months.												
Regular watering of the translocated meadow (as required depending upon weather conditions).												
Checks to be undertaken each day to include a check of any exposed excavations/pipes to ensure no animals have become trapped overnight and a check of any mounds for potential mammal burrows.												
Checks to be undertaken at the end of each working day to include: ensuring the construction site is clean and tidy, all chemicals/materials are safely stored, any excavations are covered, pipes are capped and all lighting (except security lighting) has been switched off.												
Weekly check of all protective fencing and signage to ensure this is still in place and functioning.												
Annual check of imported top soil (where relevant) for presence of invasive species.												
Ensure inclusion of integrated bat and bird boxes throughout the build.												
Compliance report including photographic evidence to be produced by the ecologist/ECoW and issued to Wiltshire Council. The compliance report will include evidence of the meadow												

translocation and must be submitted within three months prior to the commencement of works.												

8 CONCLUSIONS

8.1. This CEMP: Biodiversity has been produced to fulfil **Condition 12** of the planning consent for the Approved Development Site (planning appeal reference **APP/Y3940/W/24/3352160** and outline application reference **PL/2023/01880**).

8.2. The Developer will be responsible for ensuring that the Site Manager is aware of the mitigation detailed within this report and that the mitigation is undertaken accordingly. The Site Manager is responsible for making sure that the ECoW is contacted when there are any potential risks to protected species or habitats of ecological value, as identified within this report.

8.3. All works must be undertaken as detailed in this report, to include the sensitive working practices, phasing of work as appropriate and working within the seasonal restrictions detailed. It is essential that the lighting specification detailed is adhered to in full to protect the integrity of the commuting corridors found to be used by bats. The methods detailed will protect the value of the Approved Development Site to protected species.

8.4. This CEMP: Biodiversity is a working document and will be reviewed periodically by the Site Manager, with input from the ECoW as required. Any necessary changes will be agreed upon and included within this CEMP: Biodiversity.

8.5. Providing that the mitigation measures recommended within this report are adhered to, the development will be in accordance with current legislation for protected and notable species present within the Approved Development Site.

APPENDIX 1: UK HABITAT CLASSIFICATION BASELINE PLAN

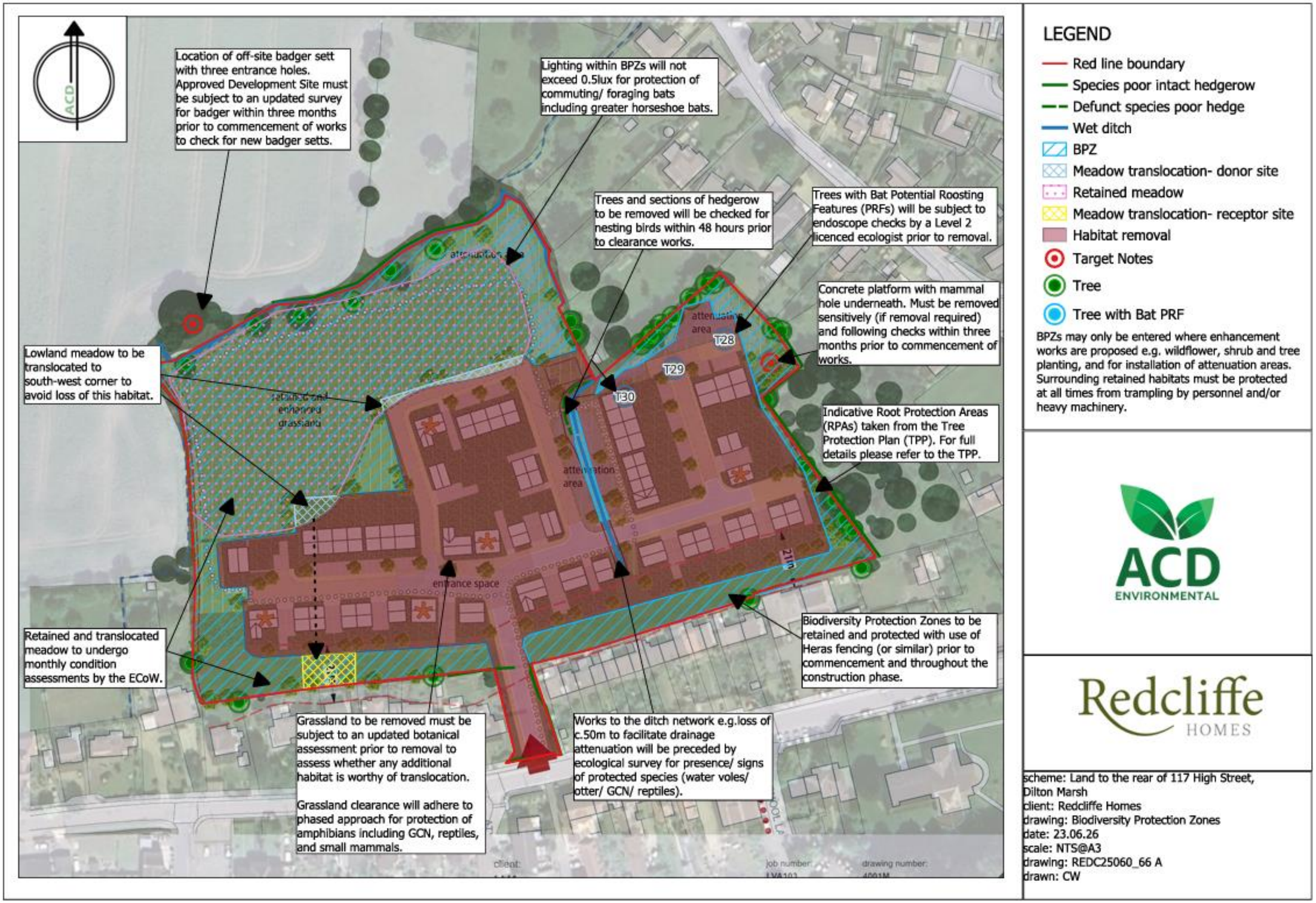
Red line boundary
Ornamental hedgerow
Defunct species poor hedge
Wet ditch
Tree
g3a - lowland meadow
g3c - other neutral grassland
g4 - modified grassland

ACD ENVIRONMENTAL

Redcliffe HOMES

scheme: Land rear of 117 High Street, Dilton Marsh
client: Redcliffe Homes
drawing: UKHab Baseline Plan
date: 23.06.26
scale: NTS@A3
drawing: REDC25060_60 A
drawn: CW

APPENDIX 2: BIODIVERISTY PROTECTION ZONES



LEGEND

- Red line boundary
- Species poor intact hedgerow
- Defunct species poor hedge
- Wet ditch
- BPZ
- Meadow translocation- donor site
- Retained meadow
- Meadow translocation- receptor site
- Habitat removal
- Target Notes
- Tree
- Tree with Bat PRF

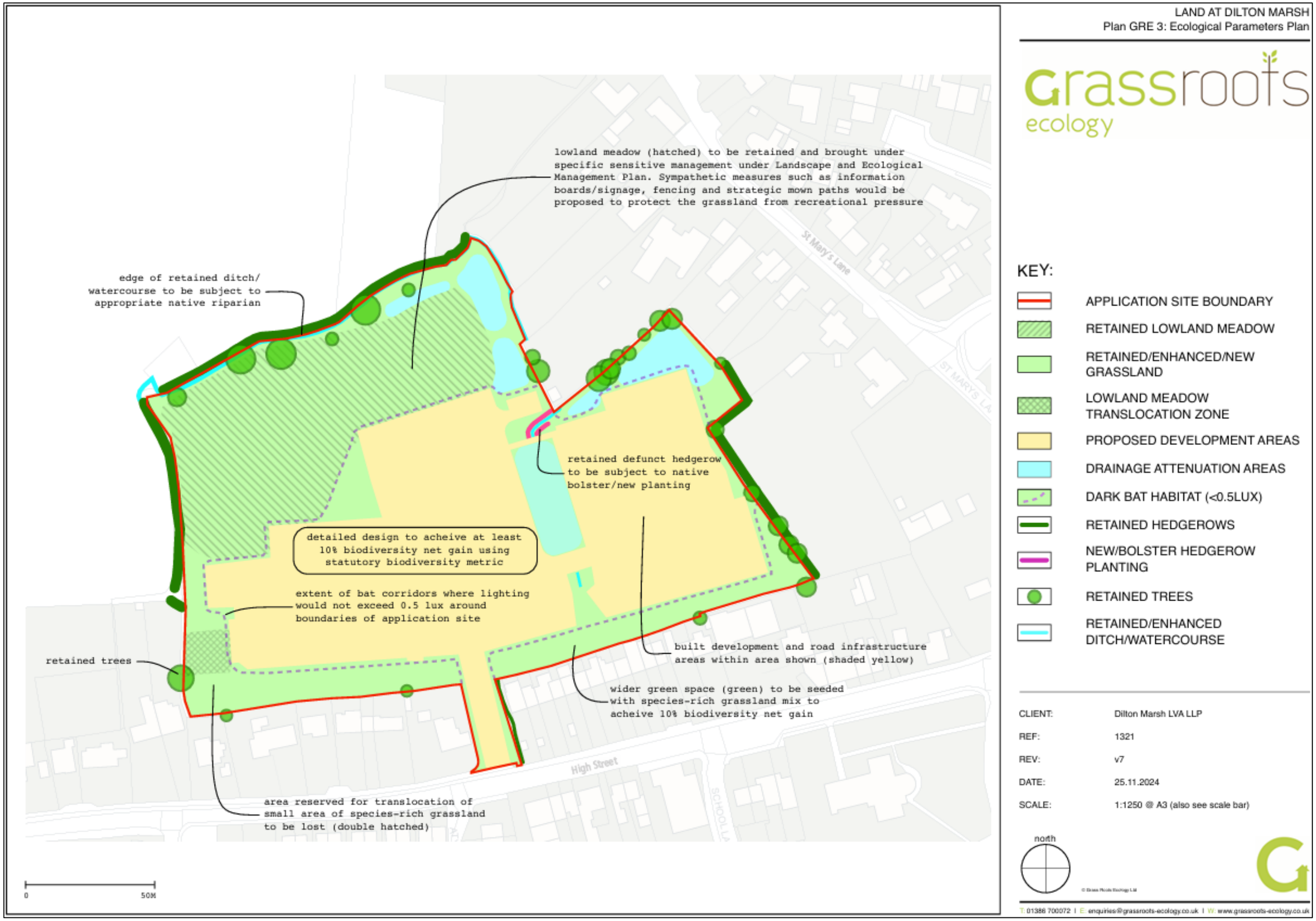
BPZs may only be entered where enhancement works are proposed e.g. wildflower, shrub and tree planting, and for installation of attenuation areas. Surrounding retained habitats must be protected at all times from trampling by personnel and/or heavy machinery.

ACD ENVIRONMENTAL

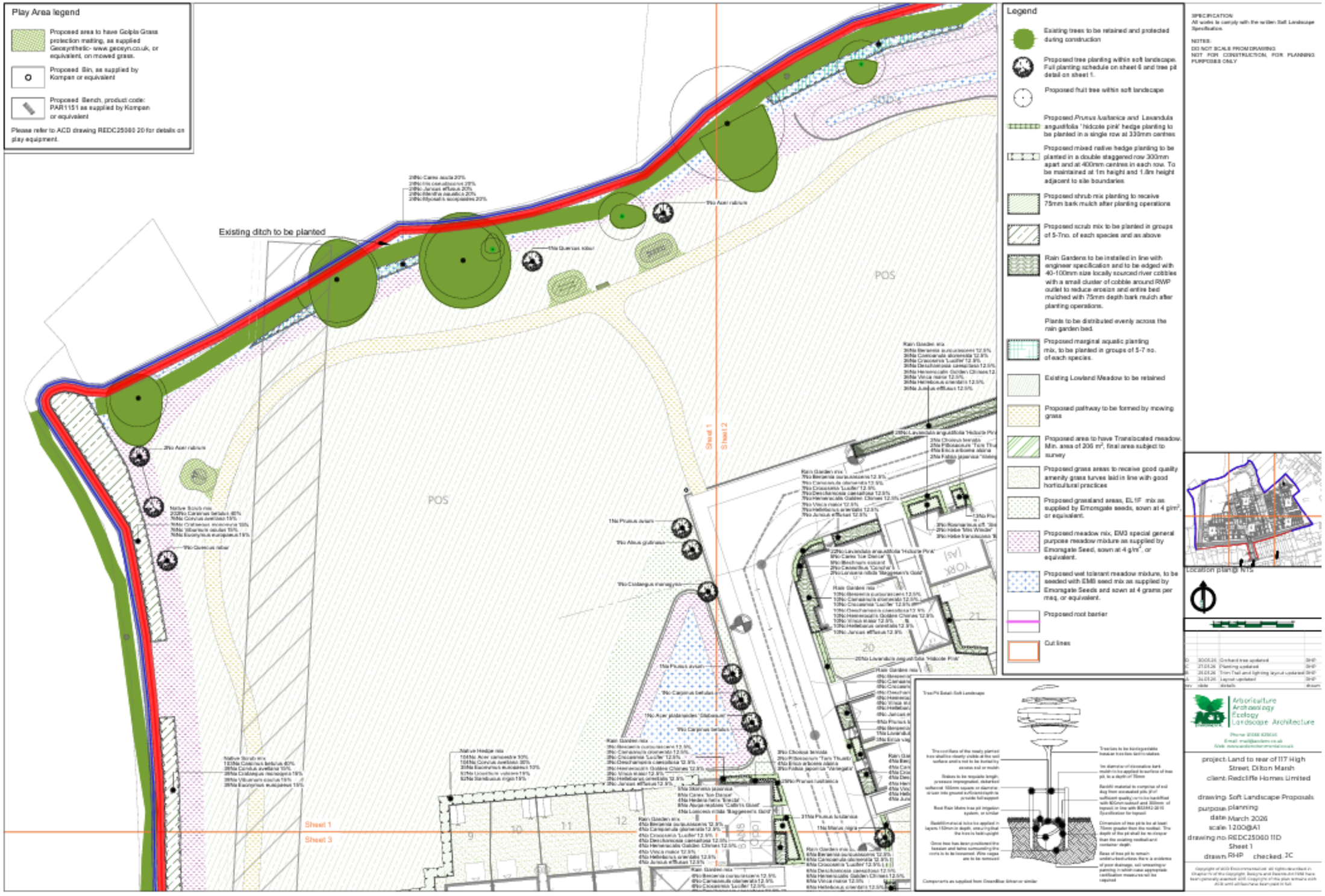
Redcliffe HOMES

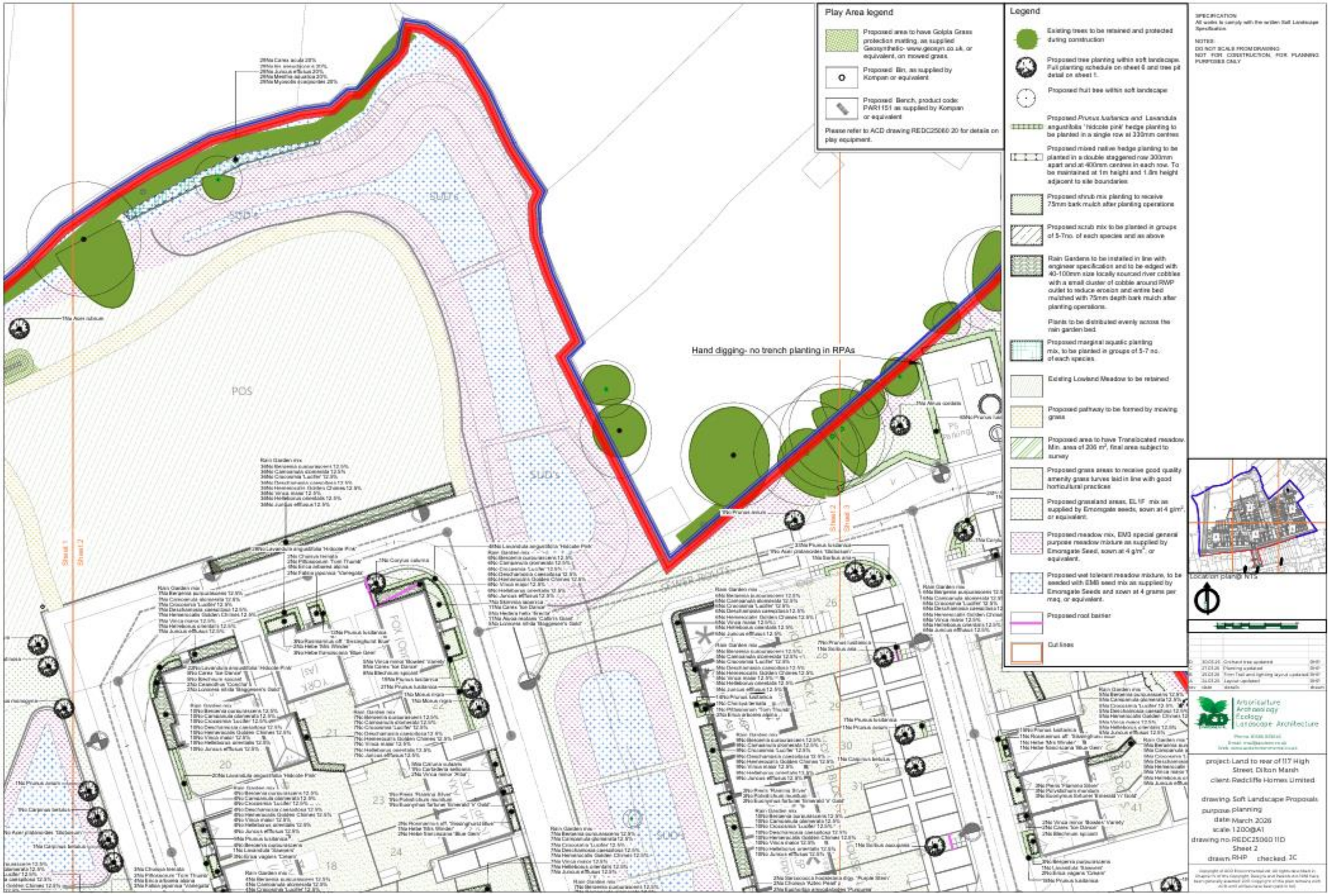
scheme: Land to the rear of 117 High Street, Dilton Marsh
client: Redcliffe Homes
drawing: Biodiversity Protection Zones
date: 23.06.26
scale: NTS@A3
drawing: REDC25060_66 A
drawn: CW

APPENDIX 3: ECO PARAMETERS PLAN



APPENDIX 4: SOFT LANDSCAPE PLANS




Play Area legend
Proposed area to have Golpla Grass protection matting, as supplied Geosynthetic- www.geosyn.co.uk, or equivalent, on mowed grass.
Proposed Bin, as supplied by Kompan or equivalent
Proposed Bench, product code: PAR1151 as supplied by Kompan or equivalent
Please refer to ACD drawing REDC25060 20 for details on play equipment.
Legend
Existing trees to be retained and protected during construction
Proposed tree planting within soft landscape. Full planting schedule on sheet 6 and tree pit detail on sheet 1.
Proposed fruit tree within soft landscape
Proposed Prunus lusitanica and Lavandula angustifolia 'Hidcote pink' hedge planting to be planted in a single row at 330mm centres
Proposed mixed native hedge planting to be planted in a double staggered row 300mm apart and at 400mm centres in each row. To be maintained at 1m height and 1.8m height adjacent to site boundaries
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Proposed scrub mix to be planted in groups of 5-7no. of each species and as above
Rain Gardens to be installed in line with engineer specification and to be edged with 40-100mm size locally sourced river cobbles with a small cluster of cobble around RWP outlet to reduce erosion and entire bed mulched with 75mm depth bark mulch after planting operations.
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Proposed area to have Translocated meadow. Min. area of 200 m², final area subject to survey
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Proposed grassland areas. EL1F mix as supplied by Emorgate seeds, sown at 4 g/m², or equivalent.
Proposed meadow mix, EM3 special general purpose meadow mixture as supplied by Emorgate Seed, sown at 4 g/m², or equivalent.
Proposed wet tolerant meadow mixture, to be seeded with EM8 seed mix as supplied by Emorgate Seeds and sown at 4 grams per mq, or equivalent.
Proposed root barrier
Cut lines
SPECIFICATION
All works to comply with the written Soft Landscape Specification
NOTES:
DO NOT SCALE FROM DRAWING
NOT FOR CONSTRUCTION, FOR PLANNING PURPOSES ONLY
Hand digging- no trench planting in RPAs
POS
SUDS
Sheet 1
Sheet 2
Sheet 3
Location plan: N/a
Arboriculture
Archaeology
Ecology
Landscape Architecture
project Land to rear of 117 High Street, Dilton Marsh
client Redcliffe Homes Limited
drawing Soft Landscape Proposals
purpose planning
date March 2026
scale 1:200@A1
drawing no REDC25060 11D
Sheet 2
drawn RHP checked JC

Hand digging- no trench planting in RPAs

Proposed orchard trees

Sheet 2

Sheet 3

Sheet 6

Legend

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- Proposed root barrier
- Cut lines

SPECIFICATION
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NOTES:
DO NOT SCALE FROM DRAWING.
NOT FOR CONSTRUCTION, FOR PLANNING PURPOSES ONLY

Location plan@ N.T.S

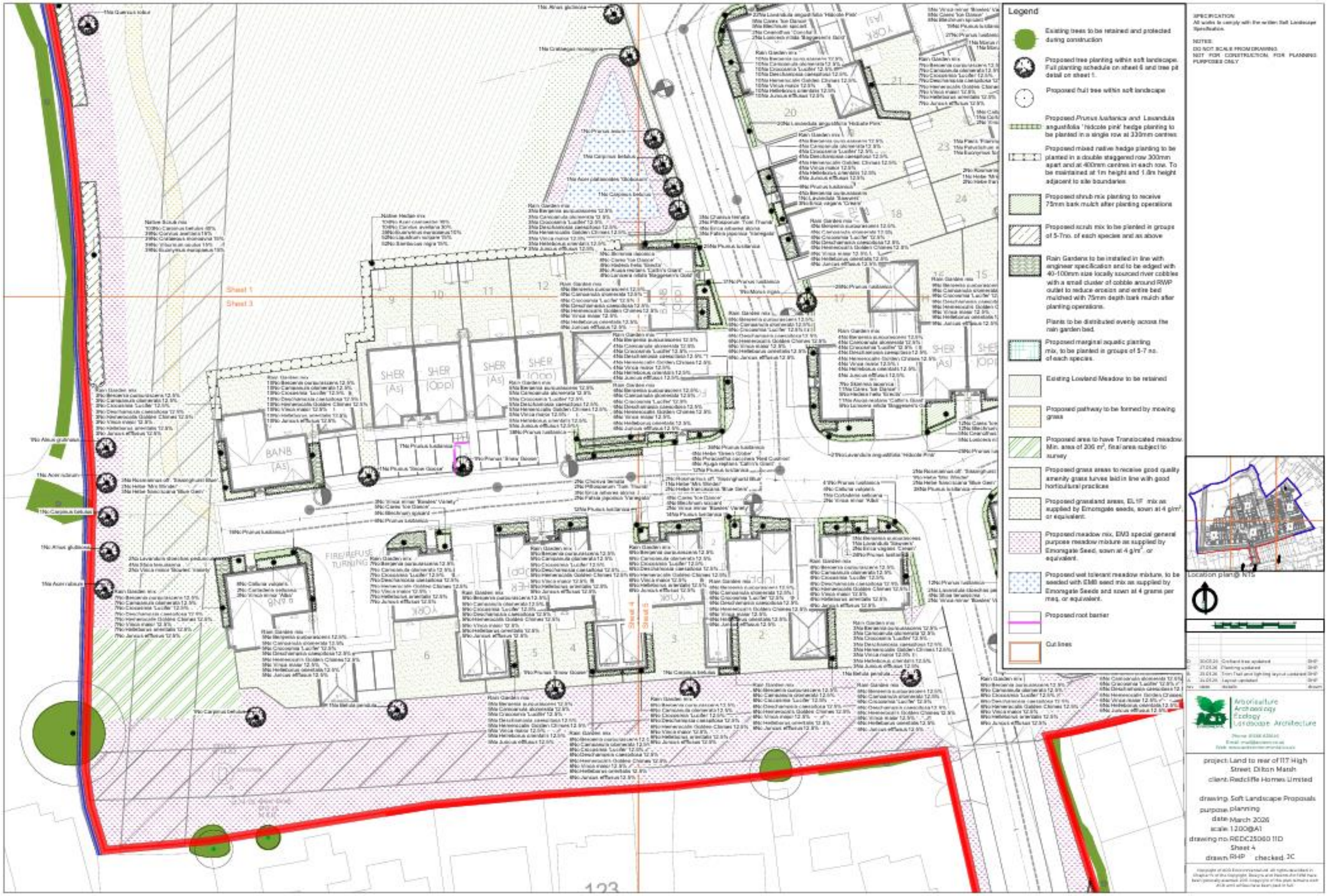
rev	date	details	drawn
D	30.03.26	Orchard tree updated	SHP
C	27.03.26	Planting updated	SHP
B	25.03.26	Trim Trail and lighting layout updated	SHP
A	24.03.26	Layout updated	SHP

Arboriculture
Archaeology
Ecology
Landscape Architecture

project. Land to rear of 117 High Street, Ditton Marsh
client. Redcliffe Homes Limited

drawing. Soft Landscape Proposals
purpose. planning
date. March 2026
scale. 1:200@A1
drawing no. REDC25060 110
Sheet 3
drawn. RHP checked. JC

Copyright of ACD Environmental. All rights reserved. Except in chapters of this Copyright Designs and Patents Act 1988 has been generally asserted. ACD Copyright of this plan remains with ACD until all has been paid in full.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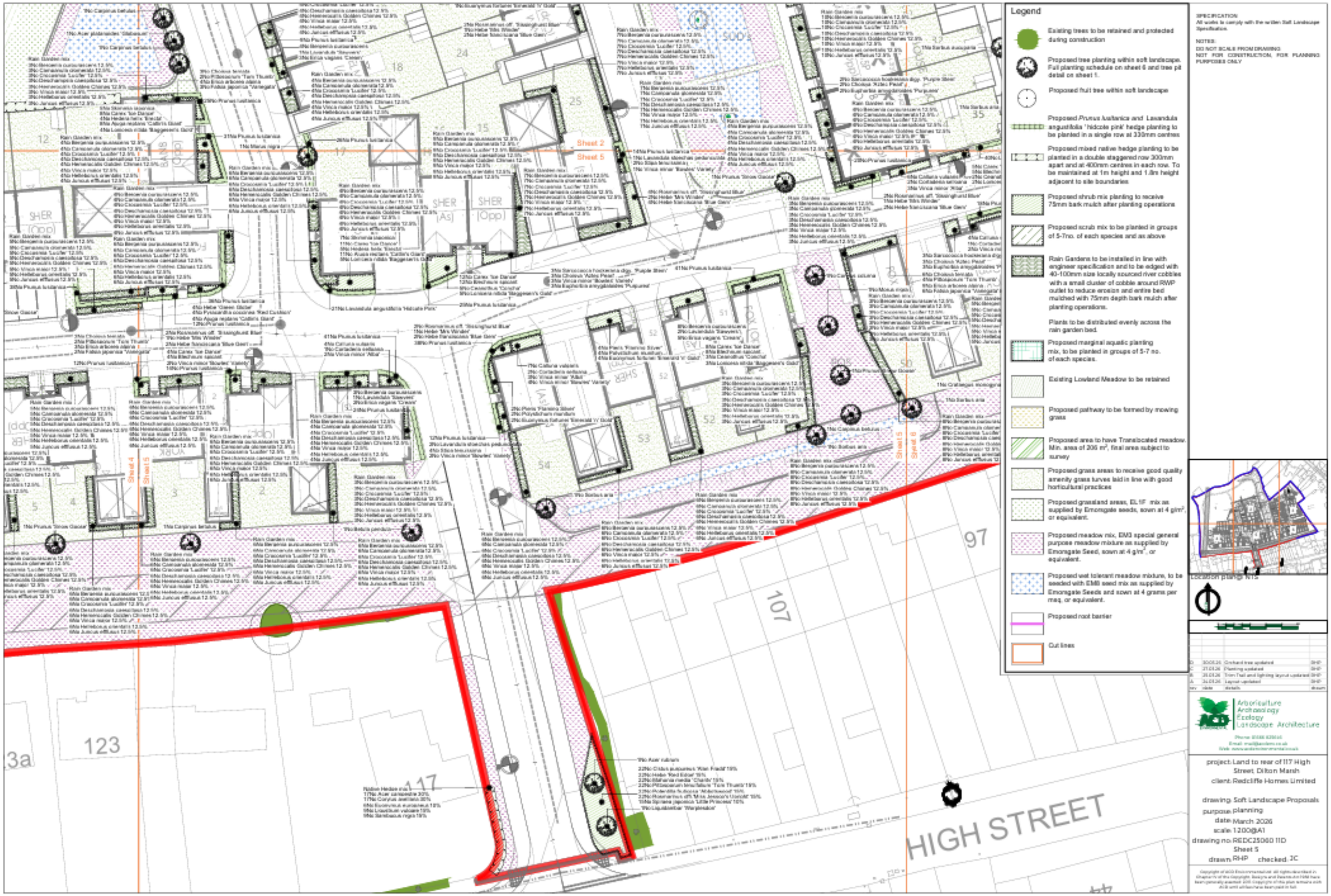
Archaeology
Ecology
Landscape Architecture
project: Land to rear of 117 High Street, Dilton Marsh
client: Redcliffe Homes Limited
drawing: Soft Landscape Proposals
purpose: planning
date: March 2026
scale: 1:200@A1
drawing no: REDC25060 11D
Sheet 4
drawn: RHP checked: JC
Sheet 1
Sheet 3
Sheet 4
Sheet 5
SHER (As)
SHER (Opp)
BANB (As)
FIRE/REFUSE TURNING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Arboriculture
Archaeology
Ecology
Landscape Architecture
project: Land to rear of 117 High Street, Dilton Marsh
client: Redcliffe Homes Limited
drawing: Soft Landscape Proposals
purpose: planning
date: March 2026
scale: 1:200@A1
drawing no: REDC25060 11D
Sheet 5
drawn: RHP checked: JC
HIGH STREET
123
117
107
97
Sheet 2
Sheet 5
Sheet 4
Sheet 6

Proposed orchard
Sheet 2
Sheet 3
Sheet 5
Sheet 6
Sheet 8
Trees
Shrubs
Perennials
Hedgerows
Grasses
Legend
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project Land to rear of 117 High Street, Dilton Marsh
client Redcliffe Homes Limited
drawing Soft Landscape Proposals
purpose planning
date March 2026
scale 1:200@A1
drawing no. RED.C25060.110
Sheet 6
drawn RHP checked JC

Sheet 6 of 6

APPENDIX 5: SITE PHOTOGRAPHS

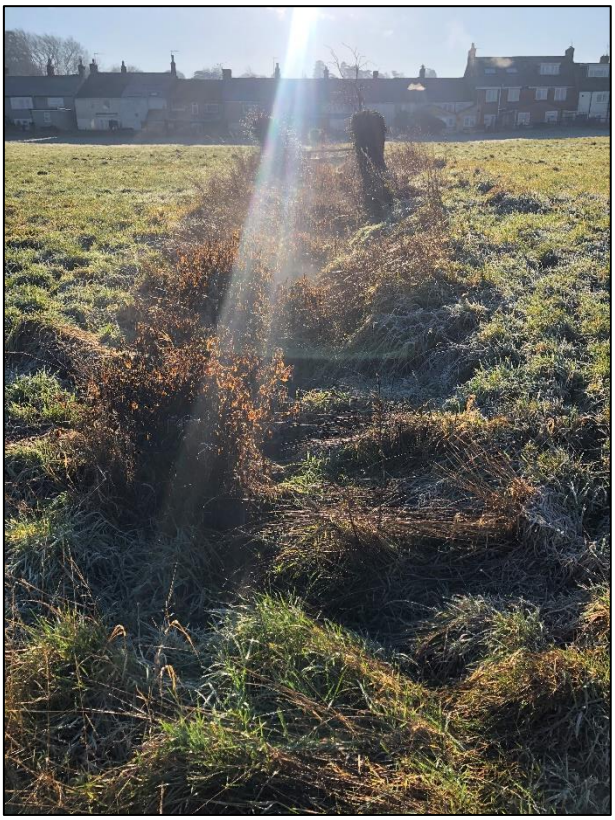
Photograph 2: Grassland. Photo taken facing north-east.

Photograph 3: Lowland meadow (not in flower). Photo taken facing south-west.

Photograph 4: Tree and hedgerow along/ abutting northern boundary.

Photograph 5: Hedgerow along north-eastern boundary.

Photograph 6: Flowing wet ditch along northern boundary.

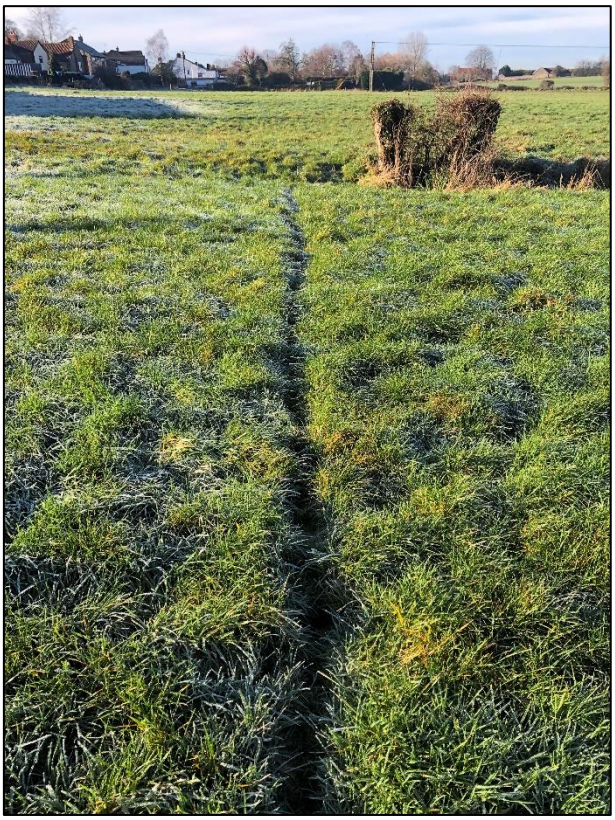


Photograph 7: Wet ditch protruding south from north-east boundary. Water level low and almost still. Photo taken facing south.

Photograph 8: Tree with knot holes suitable for bat roosts.

Photograph 9: Tree with knot holes and cavities suitable for bat roosts.

Photograph 10: Mammal hole underneath concrete platform.



Photograph 11: Mammal paths were present throughout the Approved Development Site.

APPENDIX 5: ILLUSTRATIVE MASTER PLAN BY URBAN DESIGN BOX

1:1250

0 50m

client: LVA	job number: LVA103	drawing number: 4001M	
project: Dilton Marsh	scale 1:1250 @ A3	drawn ER	
drawing title: Illustrative Masterplan	date: September 2024	status: Post Submission	

urbandesignbox.co.uk

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Urban Design Box

APPENDIX 6: BOTANICAL TECH NOTE BY ACD ENVIRONMENTAL LTD

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ACD ENVIRONMENTAL
Ecology
Archaeology
Arboriculture
Landscape Architecture

LAND AT 117 HIGH STREET
DILTON MARSH
ECOLOGY TECHNICAL UPDATE – 2nd JULY 2026

1. INTRODUCTION

1.1. This report provides the results of the update botanical survey of land at 117 High Street, Dilton Marsh (OS grid reference: ST 84807 49923) hereafter referred to as the Approved Development Site.

1.2. The Approved Development was allowed at appeal subject to conditions on 12th March 2025 (Wiltshire Ref. PL/2023/01880; Appeal Ref. APP/Y3940/W/24/3352160) for '*the development of up to 54 dwellings, including 30% affordable, and supporting infrastructure on land to the rear of 117 High Street, Dilton Marsh'.*

1.3. The Approved Development Site is a large field previously utilised as pasture for horses, bounded by a line of trees and hedgerows to the north and east, a defunct hedgerow to the west, and residential development to the south. A ditch runs along the northern boundary and into the interior of the Approved Development Site from a corner of the north-eastern boundary. Beyond the boundaries of the site is further residential development to the east and agricultural fields to the north and west (see **Figure 1** below).

1.4. The Approved Development Site has been subject to a range of ecological surveys including a Preliminary Ecological Appraisal in 2017 by Danny Alder Ecology & Conservation and Ecological Appraisals and bat activity surveys in 2021, 2022 and 2024 by Grass Roots Ecology Ltd, the results of which are contained in the Ecological Impact Assessment (EcIA) by Grass Roots Ecology[1].

1.5. A large area of grassland within the northern portion of the Approved Development Site was recognised as having a high level of species diversity during previous surveys by Grass Roots Ecology Ltd, and following consultation with Wiltshire Council and Natural England, this area of grassland was classified as 'lowland meadow'. As such, this area of grassland has been recognised as priority habitat under

[1]Grass Roots Ecology (2024). Ecological Impact Assessment, Document ref: 1321.

Schedule 42 of the Natural Environment and Rural Communities (NERC) Act, 2006[2].

1.6. As a result, the scheme design was altered to allow for retention of the lowland meadow as far as possible, with an area of 252m^2 scheduled for translocation to avoid/ minimise loss of this priority habitat.

1.7. An update walkover was undertaken on 14th January 2026 by ACD Environmental Ltd to inform post-consent reports to address planning conditions 12 and 14 for a Construction and Environmental Management Plan (CEMP) and Landscape and Ecological Management Plan (LEMP) respectively. In addition, a targeted botanical survey was undertaken on 20th May 2026 by ACD Environmental Ltd to assess whether any other areas of the grassland are worthy of translocation in line with Condition 12 of the consent and to prevent loss of priority meadow habitats.

1.8. This Technical Note has been written to conclude the results of the targeted botanical survey and associated requirements to ensure no priority lowland meadow habitat is lost in line with Condition 12 and as a supplement to the CEMP report.

1.9. This report was written by Charlene Watts, Ecologist at ACD Environmental Ltd and Qualifying member of the Chartered Institute of Ecology and Environmental Management (CIEEM). Charlene has experience of undertaking a wide range of surveys including UK Habitat Classification Surveys and Phase 2 surveys for protected species. Charlene has written various reports to present ecological findings and is experienced in Biodiversity Net Gain.

[2]Great Britain. *Natural Environment and Rural Communities Act 2006* [online]. Available from: http://www.legislation.gov.uk/ukpga/2006/16/contents.

Figure 1: Approved Development approximate red line boundary (QGIS, 2026)

2. METHODOLOGY

2.1. The Approved Development Site was subject to a targeted botanical survey using UK Habitat Classifications Ltd methodology[3] on 20th May 2026. The survey was undertaken by Principal Ecologist Jane Cole who holds a Field Identification Skills Certificate (FISC) Level 4 for botanical survey.

2.2. May is within the optimal period for UK Habitat Classification Surveys, and the vegetation present was clearly visible and allowed an accurate assessment to be made.

2.3. Areas that appeared to have a different species composition were mapped and plant species recorded using the DAFOR scale of abundance as shown in the recording sheet copied at **Appendix 1**. Using this methodology, the grassland was classified into areas of similar botanical community types.

2.4. The grassland habitats were mapped approximately by walking the Approved Development Site and relating to landmarks within the site and at the boundaries, and also by taking occasional coordinate references in the field. These habitat areas are shown in **Figure 2**.

Figure 2: Map of various grassland habitats (May 2026).

[3] UKHab Ltd (2023). UK Habitat Classification Version 2.0 (at http://www.ukhab.org)

Limitations

2.5. Due care was given to allocate grasslands to their corresponding habitats (or "*areas*") as accurately as possible, however, given the nature of plants, the grassland habitats do not have neat edges but transition into one another. In addition, the species compositions of habitats may change over time as a result of natural succession and due to seasonal changes e.g. flowering times. As such, it is possible that grassland habitats/ areas will vary slightly from those provided in this report. In accordance with the planning consent condition 12, due care must be exercised at the time of translocation works to avoid disturbance, degradation and/or loss of valuable grassland habitats, and an Ecological Clerk of Works shall be present for such works. Therefore, any variation in grassland edge habitats is not considered to be a significant limitation.

3. RESULTS

3.1. As a whole, the Approved Development Site is no longer grazed by horses and therefore conditions at the site have changed significantly. There is still some rabbit grazing however the relaxation of horse grazing has allowed the vegetation to return to the areas that were short and bare in 2022.

3.2. Notably, the botanical survey revealed that the area of lowland meadow remained largely in line with previous survey results. A summary of the grassland habitat communities with reference to labels in **Figure 2** is provided in order of importance below:

Lowland meadow

Area 3:

3.3. Area 3 remains lowland meadow in approximately the same location as in 2022. This area was measured with up to 20 species per m^2. It fades into Area 2 with species diversity increasing to the north and reducing to the south.

3.4. Other species present in Area 3 but not in Area 2 were cat's ear *Hypochaeris radicata*, oxeye daisy *Leucanthemum vulgare*, bulbous buttercup *Ranunculus bulbosus*, creeping cinquefoil *Potentilla reptans*, common sorrel *Rumex acetosa*, dandelion *Taraxacum* agg., Autumn hawkbit *Scorzoneroides autumnalis*, meadowsweet *Filipendula ulmaria* and bugle *Ajuga reptans*.

Other neutral grasslands

Area 2:

3.5. Area 2 is relatively similar to Area 3 with sweet vernal grass *Anthoxanthum odoratum*, crested dog's tail *Cynosurus cristatus* and red fescue *Festuca rubra* the most common species, all of which are regarded as typical grasses of lowland meadow as per the UK Habitat Classification definition, however Area 2 had fewer forbs than Area 3. Significantly, Area 2 did not contain any meadowsweet or oxeye daisy, both of which are lowland meadow indicators and are present in Area 3.

3.6. Area 2 also has a very small amount of creeping thistle *Circium arvense* which is not present in Area 3. Area 2 is therefore marked separately as not being as species rich as Area 3 and although it has some good species indicators of lowland meadow habitat, it was recorded as 10-12 species per m^2, which is significantly less than in Area 3.

3.7. Area 2 qualifies as gc3 other neutral grassland in line with UK Habitat Classifications.

Area 6:

3.8. Area 6 had species indicative of wet ground including abundant meadowsweet, creeping Jenny *Lysimachia nummularia*, and ragged robin *Silene flos-cuculi*. A small number of spring sedge *Carex caryophyllea* plants were identified, which is classed as near threatened on the UK red-list of vascular plants[4].

3.9. Area 6 qualifies as g3c other neutral grassland in line with UK Habitat Classifications.

Area 8:

3.10. Area 8 was mostly long grasses, with more forbs than Area 7 at approximately 7-8 species per m^2. This area qualifies as g3c grassland in poor condition under UK Habitat Classifications. It was observed that Area 6 fades down to Area 8 with reducing numbers of species overall and reducing forbs/increasing grasses.

Modified grasslands

Area 1:

3.11. Area 1 was largely grasses with fewer forbs, although those present were meadow indicators but at low densities. There was a patch with locally frequent creeping thistle and dock species, that most likely colonised the bare ground when this area was over-grazed.

Area 4:

3.12. Longer grass and edge species often shaded by trees.

[4] https://bsbi.org/learn/publications/other-books/a-new-vascular-plant-red-list-for-great-britain. Qualifies as NT on Criterion A as its geographic range (as measured by AOO) has declined by 28% over 3 generations. It was assessed as LC for the 2005 GB Red List.

Area 5:

3.13. A narrow (1m) section of rough grassland running almost the whole depth of the field, also in a slight dip, possibly a drainage feature.

Area 7:

3.14. Area 7 was mostly long grasses with few forbs, qualifying as g4 modified grassland under UK Habitat Classifications.

Area 9:

3.15. Area 9 contained a large concrete capping structure surrounded by long rank grasses with tractor damage to the ground.

Area 10:

3.16. Area 10 was similar to Area 9 underneath a telegraph pole, where cutting is not possible and so rank grasses and nettle *Urtica dioecia* dominate.

4. MITIGATION AND RECOMMENDATIONS

Recommendation 1 – retention of lowland meadow

4.1. In line with previous findings, Area 3 comprises a high level of species diversity (up to 20 species per m^2), qualifying as lowland meadow priority habitat, with the total area broadly in line with previous results. Therefore, the recommendation for retention of Area 3 and translocation of areas overlapping with the development footprint remains valid.

4.2. Full details regarding the translocation, including timing of works and methodology are outlined in the Construction Environmental Management Plan (CEMP) by ACD Environmental Ltd[5].

Recommendation 2 – reuse of topsoil

4.3. The proposed 'lowland meadow translocation zone' i.e. the translocation 'receptor site' (**Appendix 2**) situated within Area 2 (**Figure 2**) was observed to be of a similar condition to the edge of the lowland meadow that is proposed for translocation (the 'donor site'). Albeit with slightly less species diversity in comparison to Area 3 overall, the grassland within Area 2 contained approximately 10-12 species per m^2 at the time of the updated botanical survey in May 2026. As a result, Area 2 qualifies as g3c 'other neutral grassland' in line with UK Habitat Classifications as opposed to its previous classifications of 'modified grassland' within the approved Biodiversity Net Gain Assessment[6].

4.4. Notably, Area 2 is not considered to be ecologically valuable enough for mandatory translocations. However, retention and reuse of the topsoil and seed bank would retain species native to the Approved Development Site and would be more likely to establish in comparison to an introduced seed mix, particularly within the narrow strips of land they are proposed, thereby resulting in a more efficient and economic use of resources. The existing seed bank in Area 2 also contains lowland meadow indicator species, therefore retention of this topsoil and seed bank (in combination with retention of the lowland meadow) may present a practical course of action to retain the Approved Development Site's ecological interest.

[5] ACD Environmental Ltd. 2026. *Construction Environmental Management Plan*. Document ref: REDC25060_CEMP_C.
[6] Grass Roots Ecology. 2024. *CD7.6 - 1321.Statutory.Biodiversity.Metric.September.2024.*

4.5. Therefore, it is recommended that the edges of Area 2 which fall outside of the development footprint are retained and protected during the construction phase, and it is recommended that Area 1 or other areas of lower forb densities are utilised as the translocation receptor zone.

4.6. Where Area 2 must be removed to facilitate the Approved Development, it is recommended that excavated topsoil is retained and reused within the final landscape scheme. The southern and eastern edges of the Approved Development are particularly suitable areas for this (see **Appendix 3**), where a species-rich seed mix (e.g. EM3 Special General Purpose Meadow Mixture by Emorsgate Seeds[7]) is currently proposed to achieve Biodiversity Net Gain as shown on the soft landscape proposals[8].

Recommendation 3 – rescue of red-listed plants

4.7. Area 6 was deemed as ecologically valuable during the update botanical survey on 20th May 2026. Notably, this habitat contained a number of spring sedge plants which are classed as near threatened on the UK red-list of vascular plants.

4.8. It is recommended that the spring sedge plants in this area are rescued by digging out prior to excavations that will be required to create the attenuation basin in this corner.

4.9. It is also recommended that the topsoil from Area 6 is retained and re-used within the excavated basin in order to retain the seed bank and encourage establishment of plants native to the Approved Development Site within the Sustainable Drainage System (SuDS) basin.

[7] Available at: EM3 Special General Purpose Meadow Mixture - Emorsgate Seeds
[8] ACD Environmental Ltd. 2026. *REDC25060 11D – Soft Landscape Proposals Sheet 1-6.*

5. CONCLUSIONS

5.1. The area of the lowland meadow remains largely in line with previous findings in 2022 and 2024, therefore the existing recommendations for retention of the lowland meadow and areas for translocation remain valid.

5.2. No other areas of the Approved Development Site qualify as lowland meadow, nor are any other areas worthy of mandatory translocations. However, Area 2 exhibited around 10-12 species per m^2 and qualifies as other neutral grassland. Therefore, the edges of this grassland which fall outside of the development footprint should be retained and Area 1 or other areas of lower forb densities should be utilised as the translocation receptor zone instead.

5.3. Where Area 2 falls within the development footprint and will be removed, it is recommended that the excavated topsoil is retained for re-use in the final landscape scheme in place of the previously proposed Emorsgate EM3 seed mix. Re-distributed topsoil is considered more likely to establish than the introduced seed mixes, particularly along the retained narrow strips of land along the south and east.

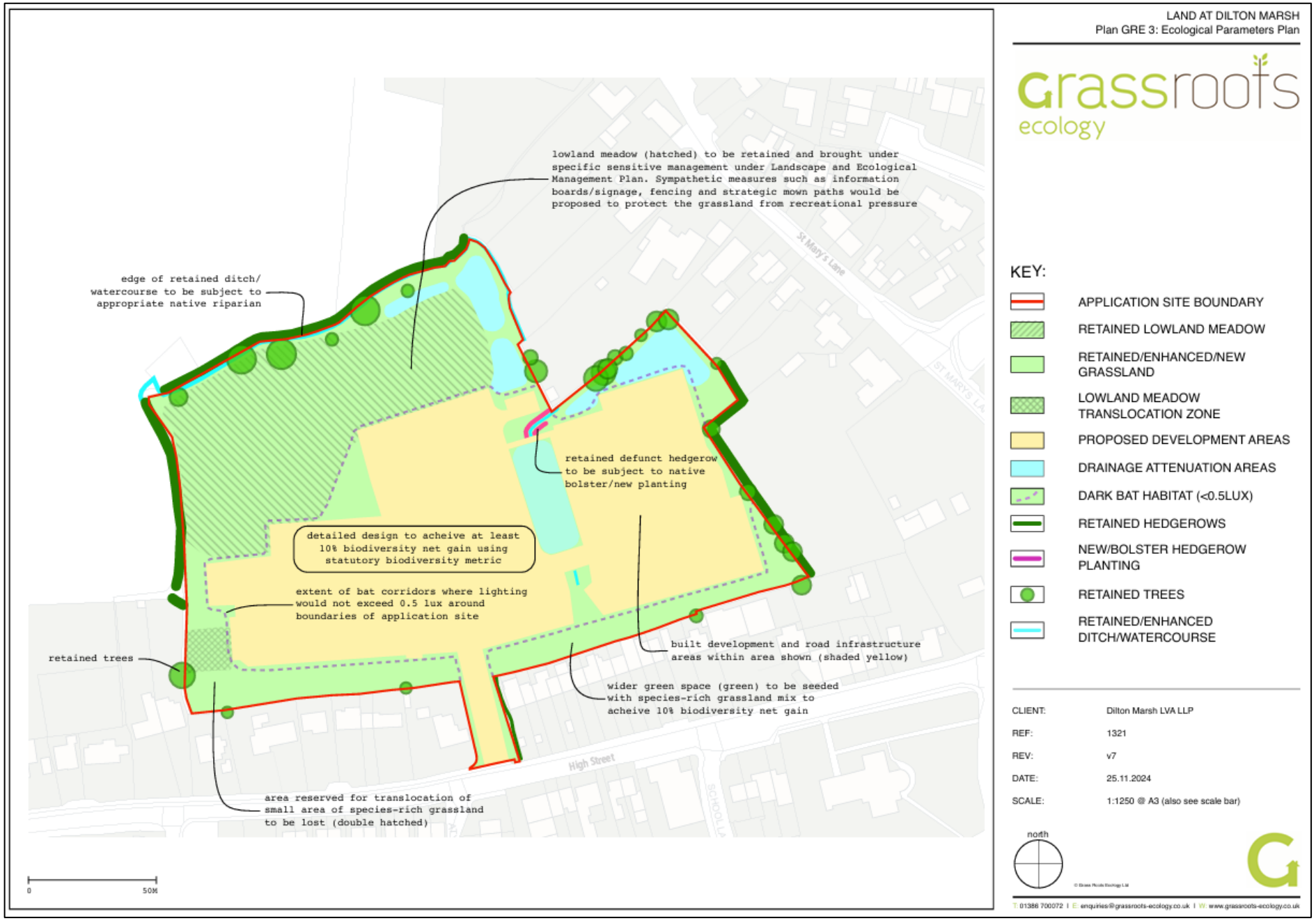
5.4. Similarly, Area 6 was identified as ecologically valuable and contained red-listed spring sedge plants. This area will be excavated to create an attenuation basin. It is recommended that the spring sedge plants are dug up prior to works and replanted in a safe and suitable location. The topsoil of Area 6 could be retained and re-used within the attenuation basin to retain the seed bank of this diverse damp grassland habitat.

APPENDIX 1: TABLE OF BOTANICAL SPECIES IDENTIFIED DURING BOTANICAL SURVEY 2026

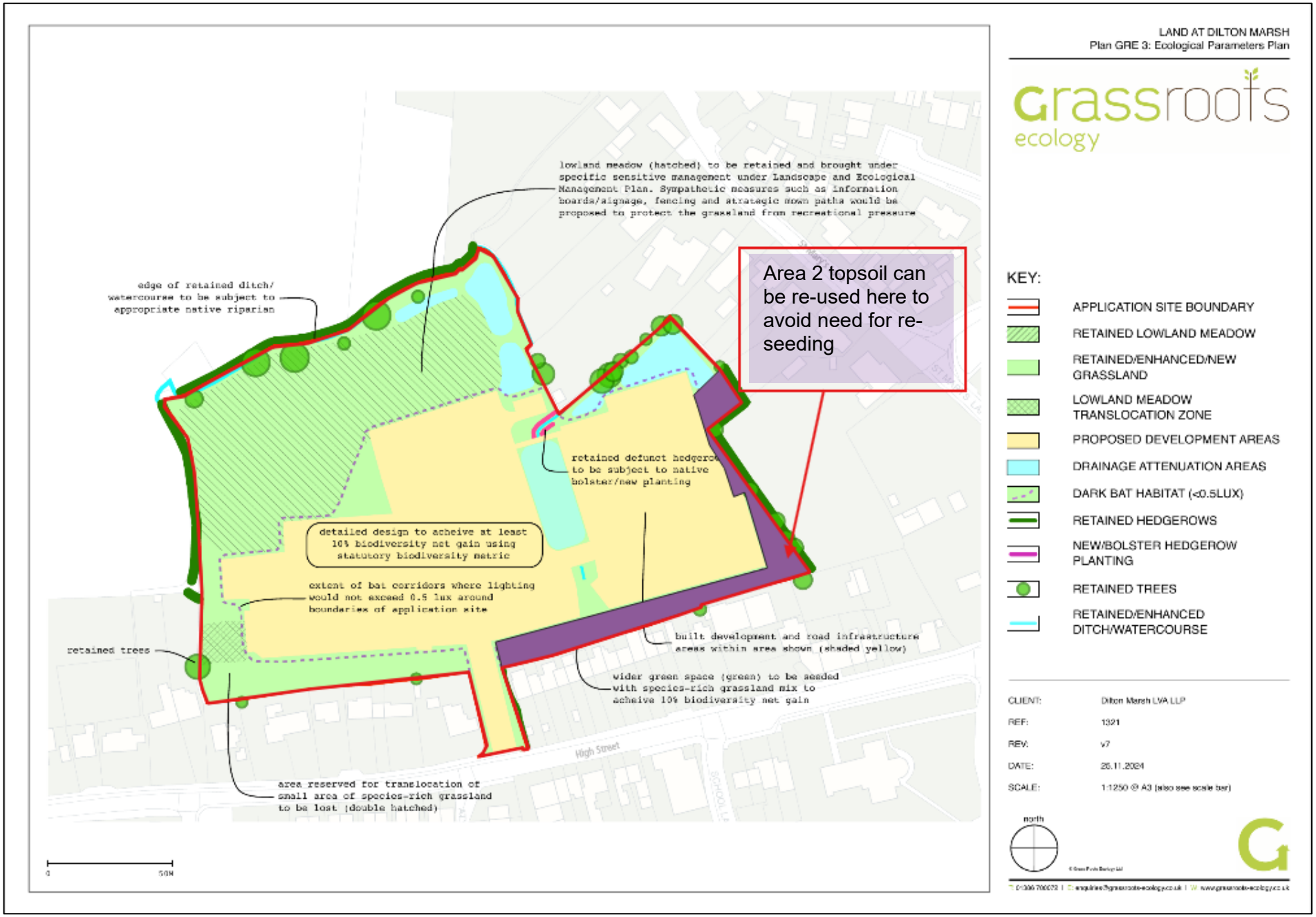
Species	1	2	3	4	5	6	7	8	9	10
Agrostis capillaris			O							
Agrostis stolonifera	O				F					
Alopecurus geniculatus		O				R				
Alopecurus pratensis	O		F	A	A		A	A		
Anisantha sterilis					A					
Anthoxanthum odoratum	O	A	A	A		A	A	O		
Arrhenatherum elatius									D	A
Bromus hordeaceus	D		R	F	O		O	O		
Cynosurus cristatus		A	O							
Dactylis glomerata	R		F	A	O		O		A	
Festuca rubra agg	F	A	A	A	R	F		F		
Holcus lanatus	F	R	R	F		O	D	D		A
Lolium perenne	O	O	R		R		O	F		
Poa pratensis			O							
Poa trivialis	F		O		R	O	A	A		
Schedonorus pratensis	O							O		
Ajuga reptans			R							
Carex caryophyllea						R				
Centaurea nigra	O	F	O			O				
Cerastium fontanum	O	R	O			O	O			
Circium arvense		R								
Convolvulus arvensis	O	R				R				
Equisetum arvense						R				
Ervilia hirsuta							R			
Fillipendula ulmaria			O	F		A				
Gallium aparine	O									
Geranium disectum	F	R	O	A	R	O	F	F		
Heracleum sphondylium	O	R	R	R	R	O				
Hypericum tetrapterum						R				
Hypochaeris radicata	R		O							
Jacobea vulgaris	R					R				
Lamium album	O									
Lathyrus pratensis	F	O	F	R		O		O		
Leucanthemum vulgare	R		F							
Lotus corniculatus	O	F	F	R		R	R	F		
Luzula campestris	R	O	F	A						
Lysimachia nummularia						O				
Plantago lanceolata	F	F	F			A	O	O		O
Potentilla anserina	O	R	O			O	O	O		
Potentilla reptans			O							
Ranunculus acris	O	O	O			O	R	O		
Ranunculus bulbosus			A	R						
Ranunculus repens		R					O			

Rubus fruticosus agg	R						R			
Rumex acetosa			R	F		O	R	R		
Rumex crispus										
Rumex obtusifolius	O					R	O	R		F
Silene flos-cuculi						F				
Scorzoneroides autumnalis			O							
Sonchus asper				R						
Taraxacum agg	R		R			R	O			
Trifolium dubium		R	R							
Trifolium pratense	O	A	A			R	O			
Trifolium repens	R									
Urtica dioecia	R								A	A
Vicia sativa	O	O				R	O			
Calliergonella cuspidata			O							

APPENDIX 2: ECOLOGICAL PARAMETERS PLAN (1321.v7) BY GRASS ROOTS ECOLOGY (2024)



APPENDIX 3: RECOMMENDED SECTIONS FOR AREA 2 TOPSOIL RE-DISTRIBUTION (APPROXIMATE)



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