

Ecological Impact Assessment

**Southern Policing Hub - Land at Mitre
Way, Old Sarum**

25 August 2026

Ecology
Arboriculture
Land Management



Report Details

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DRAFT	8 July 2026	Alexia Michaelides MBiol ACIEEM	Lindsay Taylor BSc MSC ACIEEM	Nick Hargreaves BSc MSc MCIEEM	

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Site Details

Site Name and Location	Southern Policing Hub - Land at Mitre Way, Old Sarum
Central OS Grid Reference	SU 14687 33595
Client	Wiltshire Police

Boundary



Executive Summary

Site Location	The Site is located on the south-eastern extent of Old Sarum, Wiltshire. It is surrounded by existing urban development to the north, east and south, with woodlands and agricultural fields forming the western surroundings.
Proposals	Outline application for development of a police hub building, associated outbuildings, carparking and landscaping.
Survey Work	Desk-based study, extended UK Habitat Classification survey, botany, bat activity survey, reptile survey.
Designated Sites with Potential Impacts	🦉 River Avon Hampshire SAC; 🦉 Salisbury Plain SAC; 🦉 Salisbury Plain SPA; 🦉 River Avon System SSSI; and 🦉 Seven LWSs. The Site lies within the nutrient neutrality catchment of the River Avon Hampshire SAC.
Baseline Habitats	The Site comprises a single other calcareous grassland field bound to the south west by a line of trees, and woodland boundaries, and to the south by an area of bramble scrub.
Protected/ notable Species	The Site is suitable for badger, bats including Annex II species, breeding birds, hedgehog and invertebrates.
Mitigation and Compensation	🦉 Retained habitats protected through provisions of a CEMP; 🦉 New and retained habitats to be managed for the benefit of biodiversity under provisions of a HMMP; 🦉 Sensitive light strategy for bats; 🦉 Precautionary approach to vegetation removal for nesting birds.
Biodiversity Net Gain (BNG)	A separate BNG Statement and Assessment Report is provided (GE Consulting, 2026).
Enhancements	3 no. integrated swift boxes to be installed within the new building and 3 no. bat boxes to be installed on suitable trees along the south-western boundary.

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1 Introduction

This Ecological Impact Assessment has been prepared in support of Outline Planning Application for the Land at Mitre Way, SP4 6GW. The report was commissioned by Wiltshire Police.

At this stage, all matters relating to design are reserved, apart from means of access.

All design elements shown are indicative of a potential design approach that may be taken by the Office of the Police and Crime Commissioner (PCC) and will be developed at the Reserved Matters stage.

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

1.1 Site Context

The site is located approximately 3.2 miles (5 km) north of Salisbury city centre, within Wiltshire in the Southwest of England. The Site lies to the east of the A345, which provides direct vehicular access and connections to the A36 and wider strategic road network.

The immediate surroundings comprise of a series of residential developments. The wider surroundings comprise of heritage assets, notably the Scheduled Monument of Old Sarum hillfort to the west. Salisbury historic city centre lies to the south.

The Site is well connected in terms of transport, with bus routes serving the wider Old Sarum area and Salisbury railway station located approximately 3 miles to the south, providing regular services to London, Southampton, and Exeter.

Overall, the Site is within the built form of the Old Sarum, part of the Wiltshire Local Plans mixed-used development area, with close functional links to Salisbury.

1.2 Description of Proposed Development

Proposals consist of the development of a police hub building, associated outbuildings, carparking and landscaping.

1.3 Consultation

Consultation has been sought from Wiltshire Council (WC) in relation to the Site's location within the catchment for nutrient neutrality of the Somerset Levels and Moors Ramsar site. Whilst this is discussed further in Section 5.1.3, correspondence received (see **Appendix 6**) indicates that WC are satisfied that the proposals will not have any Likely Significant Effects (LSE) on the Ramsar site therefore an sHRA is not required.

1.4 Aims

The aims of this report are to:

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

2 Methods

2.1 Ecological Scoping and Baseline Data Collection

2.1.1 Desk Study

A desk-based study was undertaken in June 2026 whereby:

- Wiltshire & Swindon Biological Records Centre (WSBRC) was contacted for records of protected/notable species and sites designated for nature conservation value within a 2km radius of the Site boundaries;
- MAGIC (www.magic.gov.uk) was searched for international designated sites (Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar) within 10km, Habitats of Principal Importance (HPI) and European Protected Species (EPS) Mitigation Licences within or adjacent to the Site;
- Wiltshire Planning Explorer was used to search for consultation zones that cover the Site;
- Aerial photography of the wider area was reviewed to identify possible important habitat features.

2.2 Field Surveys

Table 1 summarises the surveys undertaken to provide ecological baseline information for the Site. Full details are provided in the appendices.

Table 1: Summary of Baseline Data Collection Surveys

Survey Type	Date (s)	Relevant Appendix
Extended UK Habitat Classification Survey and Biodiversity Net Gain (BNG) condition assessment	24 October 2023 and 31 May 2024	3
Botanical survey	August 2025	3
Badger Survey	24 October 2023 and 31 May 2024	N/A
Bat Activity Surveys	July 2025 and June 2026	4
Reptile Survey	August – September 2025	5

2.3 Biodiversity Net Gain Assessment

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

2.4 Baseline Evaluation and Impact Assessment

Determining the importance of ecological features was undertaken in accordance with the Chartered Institute of Ecology and Environmental Management's Guidelines for Ecological Impact Assessment in the UK and Ireland (CIEEM, 2018). The guidelines recommend a scale of significance from International to Local ecological importance as a frame of reference, however, also notes that it can be adapted to suit local circumstances. As such, where ecological receptors are assessed to be of less than Local value, an additional valuation of 'Site value' has been included.

An assessment was then made of possible ecological impacts of the proposed development on each feature within the development's likely 'Zone of Influence' (Zol). Where uncertainty exists, a precautionary approach has been adopted.

Measures are described to ensure that any impacts can be avoided, minimised or compensated for by applying the mitigation hierarchy in accordance with NPPF (2026) paragraph 2 of Policy N2 which states:

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

2.5 Limitations

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

3 Baseline Conditions & Evaluation

3.1 Designated Sites

A summary of designated sites within the search area is provided in **Table 2**.

The Site lies within the Impact Risk Zones (IRZ) of multiple SSSIs and is of a type (**Rural Non-Residential**: Large non-residential developments outside of existing settlements/urban areas where the footprint exceeds 1ha) to have an effect on these sites.

Table 2: Designated Sites within 2km of Site boundary, 10km for European sites

Site Name	Proximity to Site	Description
<i>National Site Network ('European sites') and internationally designated sites</i>		
River Avon SAC	1.37km to the east of Site	Annex I habitats that are a primary reason for selection of this site: 3260 Water courses of plain to montane levels with the <i>Ranunculus fluitantis</i> and <i>Callitriche-Batrachion</i> vegetation. Annex II species that are a primary reason for selection of this site: 1095 Sea lamprey <i>Petromyzon marinus</i> 1096 Brook lamprey <i>Lampetra planeri</i> 1099 River lamprey <i>Lampetra fluviatilis</i> 1106 Atlantic salmon <i>Salmo salar</i> 1134 Bullhead <i>Cottus gobio</i> 1016 Desmoulin's whorl snail <i>Vertigo moulinsiana</i> 1831 Floating water-plantain <i>Luronium natans</i>
Salisbury Plain SAC	4.65km east of Site	Annex I habitats that are a primary reason for selection of this site: 5130 Juniperus communis formations on heaths or calcareous grasslands 6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>Festuco-Brometalia</i>) (*important orchid sites)

Site Name	Proximity to Site	Description
		Annex II species that are a primary reason for selection of this site:  1065 Marsh fritillary butterfly <i>Euphydryas (Eurodryas, Hypodryas) aurinia</i>
Salisbury Plain SPA	4.65km east of Site	Supports nationally important populations of two Annex 1 species. It supports 10% of the breeding population of stone curlew <i>Burhinus oedecnemius</i> and 1% of Britain's wintering hen harrier <i>Circus cyaneus</i> .
Statutory Wildlife Sites		
River Avon System SSSI	1.36km east	Designated for its biodiversity, it is one of the most diverse lowland chalk streams in the UK. It supports over 180 plant species, internationally renowned fish faunas, and diverse aquatic invertebrates.
County Wildlife Sites		
Old Sarum LWS	1.05km west	Hill fort with Roman and Norman archaeology with unimproved calcareous grassland on grazed ramparts, neutral grassland on mown areas within and rank mesotrophic grassland, scrub and scrub woodland elsewhere.
North Hill Down LWS	1.8km west	Unimproved calcareous grassland on a low, west-facing chalk bank with a larger area of improved grassland above.
Bishopdown LWS	1.83km south	A highly unusual urban park with semi-improved calcareous grassland.
Winterbourne Earls Meadows LWS	1.95km east	Former water-meadow adjacent to the River Bourne supporting a mosaic of neutral grassland and fen communities.
Avon and Judd's Meadow LWS	2km west	A large complex of former water-meadows on the River Avon with semi-improved neutral grassland and areas of fen vegetation.
Stratford-sub-Castle Meadow LWS	2km west	A series of former water-meadows in the Avon valley.
Devenish WWT Reserve LWS	2km north	A large WWT reserve overlooking the Avon valley, with broadleaved woodland, calcareous and neutral grassland.

The Site lies within the River Avon Hampshire catchment area for nutrient neutrality.

3.2 Habitats and Flora

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

The Site comprises a field of other calcareous grassland, other broadleaved woodland, broad-leaved plantation woodland, bramble scrub, developed land; sealed surface and a small line of trees.

3.3 Fauna

Full survey results are included in the relevant **Appendix**.

3.3.1 Amphibians

WSBRC identified no records of great crested newts (GCN) (EPS, SPI) within 2km of the Site in the last 10 years and MAGIC returned no European Protected Species Mitigation Licenses (EPSL). WSBRC returned one record of common toad within 2km of the Site in the last 10 years, located 1.6km south of Site.

The Site offers potential for GCN foraging, dispersal and shelter in the form of the other calcareous grassland, other broadleaved woodland, bramble scrub and the line of trees. It is connected to potentially suitable habitat in the wider landscape. However, there are no ponds or other waterbodies on the site or within a 250m radius of the Site. Therefore, the Site is considered to be of **Negligible** importance for GCN and other amphibian species, and as such are not considered further within this report.

3.3.2 Badger

WSBRC identified seven records of badgers within 2km of the Site in the last 10 years. The nearest was 0.7m east of the Site.

There was no evidence of badger within the Site, however the other calcareous grassland, woodland, bramble scrub and line of trees offer suitable habitat for foraging, commuting and dispersal.

Badger is not listed as a Species of Principal Importance (SPI) for the conservation of biodiversity in England and has therefore not been assigned a scale of importance in this case but will be considered further in this assessment in relation to their legal protection only.

3.3.3 Bats

WSBRC returned 118 records of bats within 2km of Site within the last 10 years; including 34 records of common pipistrelle, 22 records of soprano pipistrelle, 15 records of serotine, 23 records of *Nyctalus* species, 11 records of *Myotis* species, two records of barbastelle, 10 records of long-eared bat species and one record of Nathusius's pipistrelle. WSBRC returned seven records of bat roosts from the last 10 years within 2km of the Site, the closest being a soprano pipistrelle roost located 720m north from Site. MAGIC provided two records of EPSLs for bats within 10 years and 2km of the Site; including common pipistrelle, soprano pipistrelle, brown long-eared bats, serotine and Natterer's bat.

Bat activity surveys (NBW and automated static detector surveys) identified that the Site is utilised by multiple bat species for commuting and foraging purposes – see **Appendix 4** for full details.

A total number of 22,239 calls were recorded across the automated surveys; the vast majority of which were common pipistrelle (Total = 56.87%), followed by soprano pipistrelle (24.86%), which represented a cumulative 81.73%. Other species were recorded in lower numbers.

Location 1 to the south of the Site supported the highest number of bat passes per hour compared to Location 2, but Location 2 recorded the most passes from species considered to be more light-averse.

Annex II species were recorded on Site:

-  Barbastelle bat = 13 calls in total, 0.025 passes per hour (0.19%)
-  Greater horseshoe bat = 10 calls in total, 0.028 passes per hour (0.21%).

It is considered that the Site is of **Local** importance for commuting and foraging bats.

3.3.4 Birds

WSBRC returned over 1100 records of birds within a 2km radius in the last 10 years. This includes records for Red-listed BoCC (Stanbury *et al.*, 2021) greenfinch, linnet, skylark, hawfinch, yellowhammer, swift, nightingale, mistle thrush, corn bunting, grasshopper warbler and cuckoo. The red listed wetland bird lapwing was also returned, which would not be likely to utilise the Site itself.

The habitats on Site offer suitable habitat for a variety of bird species, including farmland and woodland specialists and ground nesting birds such as skylarks. The Site is therefore considered to be of **Local** importance for birds.

3.3.5 Dormouse

No records of dormouse were found within 2km of the Site from data searches on MAGIC maps and WSBRC.

The scrub within the Site boundary has continually been managed to near-ground level and therefore does not provide suitable habitat for dormice.

The boundary woodland and line of tree habitats do provide suitable habitat for dormice and are connected to other suitable habitats within the wider landscape, namely hedgerows and other small, wooded areas.

It is considered that the Site could be of **Local** importance for dormice, if present. However, all suitable habitat is to be retained and buffered from the proposed development therefore no further mitigation is required.

3.3.6 Invertebrates

There were 339 records of invertebrates within 2km of the Site in the WSBRC data search, most of which were butterflies, including a chalk hill blue, dingy skipper and brown hairstreak, and moths, including a white ermine, blood-vein and a September thorn.

The habitats on Site provide suitability for a variety of grassland invertebrates, including the dingy skipper the caterpillars of which feed on common bird's foot trefoil which is present within the Site. Other species listed above are not anticipated due to a lack of their foodplants being present.

The Site is considered to be of **Site** importance for the wider invertebrate community.

3.3.7 Reptiles

WSBRC returned three records of reptiles within 2km of the Site. This includes two records of slow worm, the closest located 1.67km southwest of Site and one record of common lizard located 1.2km west of Site.

Given the presence of suitable habitats within the grassland and boundary vegetation, surveys were undertaken in 2025. The reptile survey did not record any reptiles and so it is considered that they are absent from the Site and are not considered further within this report.

3.3.8 Other Notable Species

WSBRC returned three records of otter within 10 years and 2km of the Site, the closest located 1.3km southeast of the Site.

WSBRC also returned 20 records of water vole within 10 years and 2km of the Site, the closest located 1.97km east of Site.

The Site does not offer suitable habitat for otter and water vole and so the Site is considered to be of **Negligible** importance for these species.

WSBRC also returned 127 records of hedgehog within 10 years and 2km of the Site, the closest located 25m east of Site.

The Site offers suitable habitat for hedgehogs within the grassland and boundary woodlands/ tree line. Given the abundance of these habitats within the wider landscape, the Site is considered to be of **Site** importance for these species.

4 Further Survey Work

No further ecological survey work is considered necessary for this application; however, any changes to the proposed masterplan or if any significant amount of time has passed since the date of this report, a re-appraisal may be required.

5 Impact Assessment and Mitigation

5.1 Designated Sites

5.1.1 River Avon SAC

The River Avon SAC lies approximately 1.37km to the east of the Site. According to the Standard Data Form for this site¹, pathways for impacts are listed as:

- 👉 M02 – Changes in biotic conditions;
- 👉 H02 – Pollution to groundwater (point surfaces and diffuse sources); and
- 👉 J02 – Human induced changes in hydraulic conditions

5.1.1.1 Changes in Biotic Conditions

While the proposals will result in some habitat loss, significant areas of calcareous grassland as well as the woodland areas and line of trees in their entirety will be retained within the new development. Management of these habitats will include sensitive prescriptions to ensure their condition can the services they provide can be maintained following occupation of the Site.

As such, **no impacts are anticipated via this pathway and as such no further mitigation is required.**

5.1.1.2 Pollution to Groundwater (Point Surfaces and Diffuse Sources)

Stringent pollution control measures will be implemented during construction to ensure no leaks or spills enter the groundwater system. Measures will be in accordance with best practice within the CIRIA guidelines for pollution management during construction² and will include, amongst others, designated storage areas of any potential pollution sources and available spill kits throughout the Site. This can be controlled by a Construction Environmental Management Plan as a condition of the planning consent.

During occupation, a Surface Water Drainage Plan has been developed (Ridge, 2026a and b) to include a cellular attenuation infiltration system with associated catchpits in the hardstanding/ car park areas

¹ <https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0013016.pdf>

² Control of water pollution from construction sites (C532)

which will capture the main surface water run-off from these areas, and bioretention pond within the grassland to the south of the main development to provide attenuation storage and discharge via infiltration. The bioretention pond is to remain dry in normal condition but has capacity to accommodate run-off during a critical storm from a 1 in 100 year return period with a 40% allowance for climate change.

Providing the above measures are implemented, **no impacts are anticipated via this pathway and as such no further mitigation is required.**

5.1.1.3 *Human induced changes in hydraulic conditions*

There are no watercourses within or adjacent to the Site boundary therefore the River Avon is not directly connected to the Site. As such there will be no human-induced changes to hydraulic conditions of the SAC and **no impacts as a result of this pathway and as such no further mitigation is required.**

5.1.2 *Salisbury Plain SAC*

The Salisbury Plain SAC lies c. 4.65km east of the Site. According to the Standard Data Form for this site³, pathways for impacts are listed as:

- 🐾 M02 Changes in biotic conditions;
- 🐾 A04 Grazing; and
- 🐾 K04 Interspecific floral relations.

Given the nature of the proposals and the physical distances involved (>4.5km), there are **no anticipated impacts to this site via any of these pathways and as such no further mitigation is required.**

5.1.3 *Salisbury Plain SPA*

The Salisbury Plain SPA also lies c. 4.65km east from the Site. The main pathway for potential impacts to this site is via recreational pressures as a result of increased residential developments within the 6.4km buffer zone⁴.

Whilst the Site lies within the buffer zone, given that the proposals of this application do not involve residential dwellings, the scheme will not result in a net increase in recreational pressures. As such **no impacts on the site are anticipated as a result of increase recreational pressure, and as such no further mitigation is required.**

5.1.4 *River Avon Hampshire Nutrient Neutrality*

Consultation has been sought from WC on the likelihood of impacts to the nutrient levels within the River Avon Hampshire being increased as a result of the proposals. As discussed within the response provided (see **Appendix 6**), given that the proposals are for a police hub and do not include either additional overnight residential or tourist accommodation, industrial processes that result in significant water usage or the discharge of phosphorus into the catchment, or result in direct impacts on the river itself, *“it is likely that a Test of Likely Significance would conclude that there is no pathway for adverse effects on the SAC. Given the nature of the proposal (employment use) and the separation distance of*

³ <https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0013016.pdf>

⁴ https://www.wiltshire.gov.uk/media/994/Salisbury-Plain-SPA-HRA-and-mitigation-strategy/pdf/Salisbury_Plain_SPA_HRA_and_mitigation_strategy_June_2024_review_FINAL.pdf?m=1721133017827

approximately 1.37 km between the SAC and the application site, the development would likely be screened out of requiring Appropriate Assessment under the Habitats Regulations”.

As such, **no impacts are anticipated and no further mitigation is required.**

5.2 Habitats and Flora

The proposals will result in the loss of approximately 1.61ha of other calcareous grassland and 0.05ha of bramble scrub to make way for the development of a police hub building, associated outbuildings, carparking and landscaping. The woodland areas and line of trees are to be retained and buffered along the southwestern boundary.

The remaining c. 0.86 ha of other calcareous grassland will be retained and protected during construction. This will be via Heras fencing or similar to prevent disturbance and the storage of materials etc within these areas.

The retained woodland and line of trees will be safeguarded in line with best arboricultural practices during construction (in line with BS5837:2012) and all existing and newly created habitats will be managed to maximise biodiversity. This could be secured via a CEMP.

Proposed habitats will provide multi-functional roles as part of the blue/ green infrastructure and will comprise species considered resilient to climate change. The locations of newly created habitats will be chosen to minimise risk of failure, and long-term management will be secured via the HMMP.

Measures to restore and maintain existing habitats, to ensure successful establishment of new habitats, and to maintain the value of all ecological features in the long-term will be detailed within the Habitat Maintenance and Monitoring Plan (HMMP). The Arboricultural Impact Assessment (GE Consulting, 2026) details the root protection zones and hedgerow protection measures. A separate BNG statement and assessment report is provided (GE Consulting, 2026a) with the application along with the statutory metric (GE Consulting 2026c).

Some of the habitats present within the Site require further consideration in relation to supporting protected and notable species as further discussed below.

5.3 Fauna

5.3.1 Badger

Badgers and their setts (if relevant) receive protection under the Protection of Badgers Act 1992, which protects them from deliberate harm and injury.

Although evidence of badgers was not identified on Site, the Site does offer suitable habitat for badgers. Therefore, the following precautionary measures are recommended:

- 🦡 A survey update should be undertaken no more than a month prior to commencement of works.
- 🦡 Should any active setts be discovered that require removal/disturbance during the works, a Natural England badger licence will be obtained to close the sett.
- 🦡 Good practice construction measures to ensure badgers are either unable to access the construction site or cannot become trapped in excavations (e.g. through covering up at night or inserting an ‘escape ramp’).

5.3.2 Bats

5.3.2.1 Foraging and commuting

Lighting within the development has the potential to impact on commuting/ foraging bats by causing avoidance behaviour and therefore habitat fragmentation effects which can impact upon the success of roosts and viability of populations. A sensitive lighting strategy has been designed (Ridge, 2026c) implemented to keep all lighting on Site to a minimum, particularly along the south western corridor, adjacent to the woodland areas, where a darker buffer will be maintained to ensure bats of all species will continue to be able to commute and forage through the Site.

The Lighting Zone Layout within the lighting strategy report demonstrates areas where lighting will be installed. Any new external lighting will be in line with recommendations in the Guidance Note 8 - 'Bats and Artificial Lighting at Night' (ILP & BCT, 2023). Whilst the area along the north western boundary is located within the Primary Roads and Car Parks area and will require lighting, any luminaires installed along the north western boundary will be directional to prevent spill onto the offsite grassland and woodland areas, and will provide 0% up light. PIR will be utilised to ensure these lights are not on throughout the night.

Lighting on and around the new buildings should also be minimised, particularly adjacent to the boundaries, so as to avoid disturbance to bats utilising these for commuting and foraging. It is recommended that outdoor lighting erected within the Site should be on motion sensors (where appropriate) and use low wattage rated bulbs which do not emit light from the UV end of the spectrum. It is also recommended that the bulbs are covered and positioned downwards so as to minimise light spill. No windows are proposed within the buildings along the south western boundary therefore internal light spill will not have an impact on the darker corridor.

Between 1st April and 31st October, works during the construction phase should be undertaken starting no earlier than 30 minutes after sunrise and finishing no later than 30 minutes before sunset with no Site lighting overnight. Should this not be possible, any lighting considered necessary will have timers/ motion sensors fitted to reduce the duration they are on. Noise disturbance should also be kept to a minimum during this time.

The removal of habitats deemed necessary for the proposals, i.e. grassland and heavily managed bramble scrub, will initially reduce the foraging and commuting opportunities on Site. The retained grassland landscape buffers and open areas will however allow the low numbers of light-intolerant species currently utilising the existing habitats to continue to commute through the Site once developed.

It is therefore anticipated that the habitat retention and enhancement measures described will maintain the Site's capacity to support bats and will provide more diverse planting which will in turn provide increased foraging within the Site. The future management of the Site under the provisions of the HMMP will ensure successful establishment and long-term management of these features and have the potential to increase their value to foraging and commuting bats.

5.3.3 Birds

All wild birds, their nests and eggs are protected by the Wildlife and Countryside Act 1981 (W&CA) (as amended), with certain species afforded additional protection measures.

Any removal of or disturbance to any vegetation on Site that is considered to offer potential nesting habitat for breeding birds (i.e. should the scrub be allowed to grow to be suitable), should be undertaken between September and February inclusive or following inspection for active nests by a suitably

qualified ecologist. If nesting birds, including ground nesting birds, are found to be present then a buffer will be implemented around the nest, in which no works can take place until all birds have fledged. A toolbox talk will be prepared and delivered by a suitably qualified ecologist and kept on site for the duration of the works.

New mixed scrub and tree planting within the development will provide new nesting opportunities during occupation of the Site.

5.3.4 Invertebrates

Invertebrates will be impacted at no more than a local level through the removal of the other calcareous grassland and bramble scrub. The retained areas of grassland will continue to provide suitable habitat, and further compensation and enhancement of the Site will be undertaken through new grassland, mixed scrub, hedgerow and tree planting.

5.3.5 Hedgehogs

In the absence of mitigation, there is risk of harm to hedgehog, an SPI species, during vegetation removal. A check of the area immediately prior to removal should be undertaken. Any individuals found will be moved by gloved hand to a place of safety, such as the offsite woodland areas.

The measures described above for badgers will ensure hedgehogs are protected during the construction period.

The habitats created as part of the development, e.g. grassland, scrub and hedgerows will continue to provide foraging and commuting habitat during operation, allowing any existing population of hedgehog to be maintained. To ensure free movement through the Site, hedgehog holes (13cm x 13cm) must be provided at the base of any solid fencing between gardens.

The layout of the proposals provides continuity of commuting habitat, with new roads to be used infrequently by slow moving cars. As such it is considered that hedgehog and other species will continue to traverse freely through the Site.

6 Biodiversity Net Gain

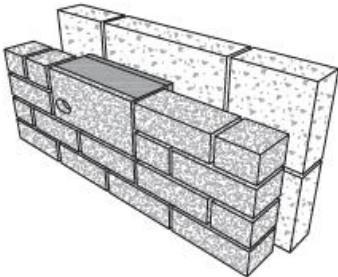
The baseline units for the Site comprise 20.67 habitat units and 0.07 hedgerow units. An indicative BNG assessment suggests that offsetting is likely to be required. Further details are provided in the BNG Statement and Assessment Report (GE Consulting, 2026a), which provides the BNG information required to support the planning application under Article 7 of The Town and Country Planning (Development Management Procedure) (England) Order 2015 as well as local information required by Wiltshire LPA, and in the submitted statutory biodiversity metric (GE Consulting, 2026b).

7 Protected/Notable Species Features

The following enhancements detailed in **Table 3** are recommended.

Table 3: Enhancement Features

Quantity & Type	Illustrations	 Description & Installation
3 no. integrated swift bricks		 Density: three boxes on the main building (clustered).  Fully integrated boxes to be built into the fabric of the building. These are

Quantity & Type	Illustrations	Description & Installation
	 WoodStone Build-in Swift Nest Box Deep (nhbs.com)  Afs 'S' brick  Installation – integral nestbox installed in outer leaf of brickwork in a traditional cavity wall construction	more secure and eliminate future maintenance requirements. - Suitable models include the PRO UK Rendered Build-in Swift Box, WoodStone Build-in Swift Nest Box Deep or the Action for Swifts (AfS) 'S' brick which can be chosen to suit the finish of the building. Suppliers include nhbs.com, wildcare.co.uk and actionforswifts.com/. - Swift boxes are recommended as they are considered a universal box suitable not only for swifts but also for house sparrows and other small birds (CIEEM, 2021). - Install at the highest point of the building, ideally at least 5m above ground level. - To be sited under the shelter of eaves or overhanging roofs where possible, avoiding locating above doors and windows. - Entrance out of direct sun and the prevailing weather and away from perches/ledges where birds are at risk from predators. - Ensure a clear flyway of ideally at least 5m, avoiding obstructions such as trees. - See swift-conservation.org for additional advice.
3 no. tree mounted bat box	 Schwegler 2F bat box	- Density: one box on three retained trees along the south western boundary. - To be externally mounted on trees at a height of at least 3m above ground level. - Fix securely to an open section of tree trunk. - Boxes are to be made of a durable material such as woodstone or woodcrete. - Suitable models include the Schwegler 2F bat box, Low Profile WoodStone Bat Box or similar approved. Suppliers include www.nhbs.com and www.wildcare.co.uk. - Locate where there is a clear, unlit flight path for bats to linear vegetation

Quantity & Type	Illustrations	Description & Installation
	 Low Profile WoodStone Bat Box	(e.g. hedgerows) and away from windows. Install away from any artificial light sources, to prevent light spill illuminating the boxes.
Hedgehog holes	 Example hedgehog hole and sign  Gravel board with in-built hole	- Include c.13cm x 13cm cut out through all close-boarded fences or walls (where levels allow) to allow hedgehog movement throughout Site. - These can be holes created during fence construction, or purpose-made products such as the Durapost Hedgehog Hole and Hedgehog Gravel Boards (or similar) available from suppliers including www.jacksons-fencing.co.uk or www.ibstock.co.uk/. - To reduce the risk of these being blocked, a small 'Hedgehog Highway Sign' should be attached. Available from www.nhbs.com. - Further information is available at: https://www.hedgehogstreet.org/help-hedgehogs/link-your-garden/

8 Monitoring

Monitoring should be undertaken to ensure that the mitigation described in this report has been undertaken to a satisfactory standard. This applies to both the construction and operation phases of the development.

9 Conclusions

In summary, the development of the Site has the potential to impact on a variety of protected species as a result of direct impacts due to loss of habitats as well as indirect impacts caused by disturbance factors both during construction and operation, particularly in regard to lighting.

Mitigation and compensatory measures have been designed to ensure that the proposals and work programme have minimal adverse impacts on ecological features.

Enhancement features have also been described with the aim of providing an increase in wildlife opportunities on Site post-development, contributing to the aims of National Planning Policy Framework and local policy.

An indicative Biodiversity Metric has been supplied which shows that off-setting is required. The assessment will be updated based on final plans for the development, as part of the pre-commencement BNG condition.

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Key:

-  Site Boundary
-  Line of Trees
-  g3c - Other calcareous grassland
-  h3d - Bramble scrub
-  u1b - Developed land, sealed surface
-  w1g - Other woodland-broadleaved
-  w1g7 - Other broadleaved woodland types

Plan is to Scale
Scale at A4: **1:1,250**



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

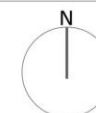
Figure 1:
BNG Baseline Plan

Project:
Old Sarum Employment Land

Client:
Wiltshire Police

Date:
11/6/2026
Ref:
2269-BNG-F1

Drawn:
AG
Revision:
-





Key:

 Site Boundary

Bat Transect

Transect Results

● Common pipistrelle

● Soprano pipistrelle

● Serotine

● Nyctalus species

Transect Start Points

① 1 - August

② 2 - October

③ 3 - April



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Figure 2:

Night-time Bat Walkover Survey Results

Project:

Old Sarum Employment Land

Client:

Wiltshire Police

Date:

23/6/2026

Ref:

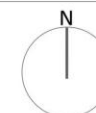
2269-EclA-F2

Drawn:

EEB

Revision:

-





Key:

Site Boundary

Static Locations

Static Direction

Static Results

All Bats

Annex II

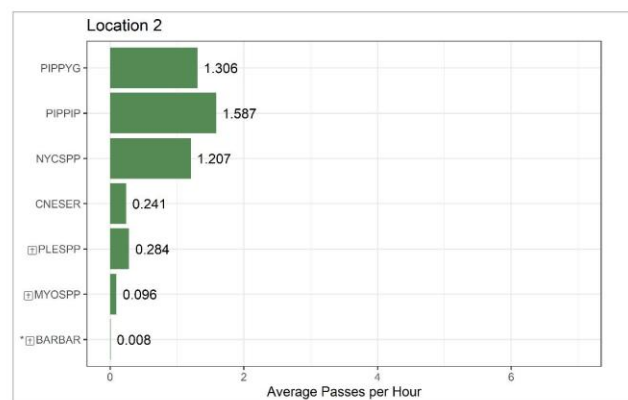
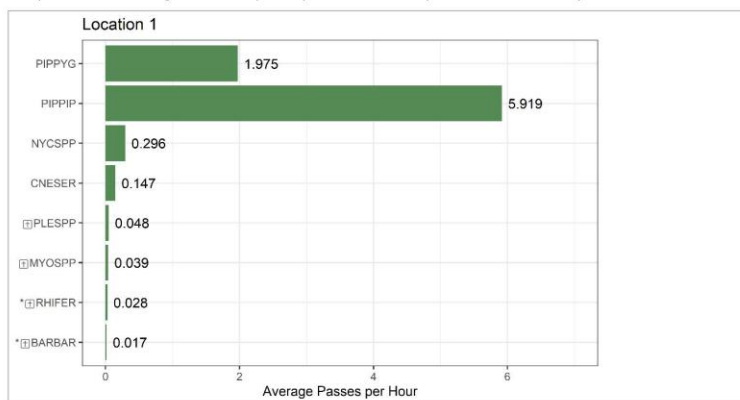
Light averse species

Excluding Pipistrelle species

Circles are indicative of the average number of bat passes per hour for monthly surveys conducted between April and October



Graphs show the average number of passes per hour for each species across the survey season at each location. Annex II bat species are indicated with an "X".



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Figure 3:
Automated Bat Detector Survey Results

Project:

Old Sarum Employment Land

Client:

Wiltshire Police

Date:

23/6/2026

Ref:

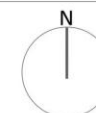
2269-EclA-F3

Drawn:

EEB

Revision:

-



Appendix 1 – General Glossary of Terms

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

Appendix 2 – Planning Policy and Legislation

Habitat and Species Legislation

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

- 🦋 The Wildlife and Countryside Act (WCA) 1981 (as amended);
- 🦋 The Conservation of Habitat and Species Regulations 2017 (as amended);
- 🦋 The Countryside Rights of Way (CROW) Act 2000;
- 🦋 The Hedgerows Regulations 1997;
- 🦋 The Protection of Badgers Act 1992; and
- 🦋 The Natural Environment and Rural Communities (NERC) Act 2006.

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

Environment Act 2021

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

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

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

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

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

Local Nature Recovery Strategies

Local Nature Recovery Strategies (LNRs) were introduced under the Environment Act 2021 as a key mechanism for delivering nature recovery in England. They are locally prepared, spatial strategies that identify priorities and opportunities for habitat creation, enhancement and restoration, helping to establish a coherent Nature Recovery Network across the country. Each LNR comprises a statement of biodiversity priorities and a habitat map identifying locations where actions for nature recovery are likely to provide the greatest benefit. LNRs are intended to guide and coordinate action by local authorities, landowners, developers, conservation organisations and other stakeholders, ensuring that efforts to restore biodiversity are targeted and strategic. They also support the delivery of wider environmental objectives, including Biodiversity Net Gain (BNG),

climate resilience, ecosystem services and species recovery. They are a material consideration in environmental planning and decision-making.

National Planning Policy Framework 2026

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how local planning authorities should incorporate them into their own policies and plans. Section 19 of the NPPF contains several policies targeted at enhancing the natural environment and requires local authorities to consider how impacts on biodiversity can be minimised and provide net gains in biodiversity.

Policy N2 states that:

1. *“To contribute positively to the natural environment, and support nature’s recovery, development proposals should:*
 - a. *Consider the environmental qualities of land proposed for development, including habitats, landscape character and the natural beauty of the countryside, and identify opportunities for those qualities to be conserved or enhanced (including through requirements for biodiversity net gain where these apply);*
 - b. *Take into account the quality of agricultural land (including that classified as best and most versatile agricultural land, and its grade), and if significant development of agricultural land is necessary, use areas of poorer quality land where possible;*
 - c. *Take suitable opportunities to connect to and strengthen ecological networks that extend beyond the site, drawing on the measures proposed by Local Nature Recovery Strategies, National Forest Strategies and Community Forest Plans, where present, and other relevant assessments;*
 - d. *Conserve and enhance existing natural features of visual, historic or nature conservation value (such as established trees and hedgerows) where possible; and use appropriate landscaping to help create a well-designed place and integrate the development into its surroundings;*
 - e. *Use green infrastructure provided as part of the scheme and nature-based solutions to secure multiple benefits: such as for biodiversity; surface water and pollution management (including maintaining flow rates and water quality); climate change mitigation and adaptation, and recreation;*
 - f. *Minimise any adverse impacts on biodiversity and include features which support priority or threatened species such as swifts, bats and hedgehogs. Development proposals should incorporate integrated nest boxes (commonly known as swift bricks) into their construction unless there are compelling technical reasons which prevent their use or would make them ineffective; and*
 - g. *Ensure that green infrastructure and other features to support nature are located and designed to minimise risk of future failure, and that appropriate measures are in place for any necessary long-term management.*
2. *If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated or, as a last resort, compensated for, then the development should be refused.*

3. *Development proposals may incorporate biodiversity enhancements which exceed the statutory objective for biodiversity net gain, but this should only be a requirement where it is set out in up-to-date development plan policies for specific site allocations. Decisionmakers should not give weight to other development plan policies which require biodiversity gains which go beyond the statutory framework, including where a policy requires gains for development proposals which are exempt.”*

In addition, Policy N3 states that:

1. *“In recognition of the benefits which trees can provide for biodiversity, climate change mitigation and adaptation, and the character and quality of the built environment, development proposals should:*
 - a. *Make new streets tree-lined (unless there are strong reasons why this would be inappropriate in specific streets), and incorporate trees in other suitable locations, such as in parks and through the provision of community orchards;*
 - b. *Ensure that the selection of species and their placement is compatible with highways and other infrastructure requirements and the needs of different users of public spaces; and will be effective in helping to adapt to the effects of climate change and delivering other environmental benefits. Suitable arboricultural advice should be sought, and proposals discussed with highways and trees officers where necessary, so that the right trees are planted in the right places; and*
 - c. *Make provision for the long-term maintenance of both existing and newly-planted trees which form part of the development.”*

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

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

Local Nature Recovery Strategies (LNRS) (see above) are a material consideration of planning applications and map areas important for existing biodiversity and priority areas for enhancement and restoration.

Regional/ Local Planning Policy

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

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

Neighbourhood Plan

The Site is located within the catchment of the Laverstock and Ford Communities Neighbourhood Plan (2021 to 2036). Policies of relevance to ecology and Biodiversity are listed below.

“Policy 2: Protection and enhancement of the distinctive landscape character, wildlife habitats and heritage assets

Development proposals shall, appropriately to their scale and location:

- a. as a minimum, maintain the visual character of the landscape when viewed from both inside and outside the Parish.*
- b. have regard to the Landscape Sensitivity Assessment (2020) (see Appendix 1) and in High and Medium/High sensitivity landscapes, as identified in the Assessment, and in other locations where the scale of impact requires, be accompanied by a Landscape and Visual Impact Appraisal.*
- c. provide an overall improvement to wild life habitats. To this end, development shall:*
 - ☐ be supported by an ecological assessment of the proposed development, including quantitative evidence of biodiversity net gain using Natural England's Biodiversity Metric*
 - ☐ avoid significant encroachment into the green areas on either side of the River Bourne, along Ford Down/Cockey Down/Laverstock Down and around Ford, including the Bat corridor along Green Lane*
 - ☐ replace any loss in hedgerows and woodland with at least the equivalent area planted with native species in an equivalent location.*
- d. where heritage assets are impacted (including but not restricted to any sub-surface archaeological remains), provide a heritage statement which should include:*
 - ☐ identification of heritage asset(s)*
 - ☐ statement of significance of the asset, including its setting*
 - ☐ assessment of impact of proposed development on the asset and its setting*
 - ☐ measures to mitigate any such impacts."*

UK Post-2010 Biodiversity Framework

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

Appendix 3 – Extended UK Habitat Classification Survey

Method

A site walkover was undertaken Anna Galvin BSc MSc ACIEEM on 24 October 2023 when weather conditions were dry with good visibility. An update walkover was undertaken by Lindsay Taylor on 31 May 2024.

An in-depth botany survey was undertaken on Hamish Kidd FISC 4 on 8 August 2025 when weather conditions were dry with good visibility.

A walkover of the grassland parcel was undertaken, followed by detailed sampling using 1m² quadrats, to collect detail on species and sward composition, the number of which was determined by the characteristics of each parcel. Where it became rapidly apparent that grasslands were clearly species poor modified grassland, three quadrats per parcel were sampled to evidence this. In parcels which were more diverse, six quadrats were sampled.

Estimated percentage cover of the below features were assessed based on a qualitative overall assessment of each parcel, along with data collected from quadrats:

- 🍷 Ryegrass and white clover;
- 🍷 Herbs, sedges and rushes;
- 🍷 ‘Undesirable species’ (as defined within Defra, 2024a); and
- 🍷 Bare ground.

Frequency of species was defined using the DAFOR methodology, adapted from that detailed within the Farm Environment Plan (Natural England, 2010):

- 🍷 Dominant: Recorded to cover a majority of the ground in all quadrats and qualitatively assessed as dominating the sward;
- 🍷 Abundant: Recorded in all quadrats, and qualitatively assessed as comprising a significant proportion of the sward;
- 🍷 Frequent: Recorded in >50% of quadrats;
- 🍷 Occasional: Recorded in 20-50% of quadrats; and
- 🍷 Rare: Recorded in <20% of quadrats.

All habitats within the Site were identified, described and mapped during the field survey in accordance with the UK Habitat Classification (UKHab) (UKHab Ltd., 2023 (V2.0)) and Statutory Biodiversity Metric (Defra, 2024b) classifications for hedgerows, with other linear and point features mapped using Phase 1 Habitat Survey symbology (JNCC, 2010). Primary habitats have been mapped to a minimum mapping unit (MMU) of 25m², although where features of note of a smaller scale are present, these have also been recorded and mapped.

Any habitats (e.g. traditional orchard) with no appropriate primary habitat label were assigned a secondary habitat code. Other secondary UKHab codes were recorded where relevant, although they are described qualitatively within this report for ease of reading.

Ditches were classified in accordance with best practice i.e. if considered likely to hold water for <4 months of the year, they were considered to be dry and as such are not included as a ditch within the BNG assessment (Defra, 2024b).

The survey was extended to highlight the potential presence of protected and notable species in accordance with CIEEM’s Guidelines for Preliminary Ecological Appraisal (2017). This involved a search to identify the presence or potential presence of species such as breeding birds, bats, badger, dormouse, reptiles and amphibians. Target Notes (TNs) were used to record any features or habitats of ecological interest. Where

access allowed, adjacent habitats were also considered in order to assess possible impacts of the proposal in a wider context.

A digital map was produced using QGIS. The habitat map is shown in **Figure 1**.

Results

Habitat Descriptions

The Site comprised a single other calcareous grassland field, bound to the southwest by a line of trees, and woodland areas, and to the south by an area of bramble scrub. Photographs and brief descriptions are provided below, including a list of dominant vegetative species within each habitat.

Table 4.1: Habitat Summaries

Habitat Summary	Photograph
Other calcareous grassland The majority of the Site comprises other calcareous grassland. The sward was uniformly long at the time of survey and is likely managed by hay cut. Clear signs of historical disturbance were present, with some undesirable species (creeping thistle, creeping buttercup, white clover) persisting as a result. Grasses comprised predominantly false-oat grass, rough meadow grass, red fescue and Yorkshire fog with less frequent timothy, perennial ryegrass and cock's-foot. A number of herbs were present across the parcel, with agrimony, bird's-foot trefoil, wild marjoram, ox-eye daisy, rough hawkbit and wild basil being indicators for calcareous grassland. All indicator species were recorded as 'Occasional' on the DAFOR scale, with wild marjoram recorded as frequent. Species diversity was recorded at 11 species per m², with cover of broadleaved herbs exceeding 20% across the parcel. Ryegrass and white clover cover was less than 30% across the parcel. Although calcareous indicator species were recorded within the parcel, the grassland does not meet the criteria for lowland calcareous grassland under the UKHab classification. Species richness	

Habitat Summary	Photograph
was below the threshold typically associated with lowland calcareous grassland, with fewer than 15 species recorded per m². In addition, whilst calcareous indicator species were present, their frequency across the parcel was insufficient to demonstrate the consistent floristic composition required for classification as lowland calcareous grassland. The habitat is therefore considered to represent a more species-poor calcareous grassland community and is most appropriately classified as other calcareous grassland.	
Bramble Scrub with Line of Trees in the background An area of managed bramble scrub is present on the southern boundary.	
Woodland (other broad-leaved woodland and plantation woodland) An even-aged woodland comprising predominantly sycamore is present on the western boundary.	

Habitat Summary	Photograph
Dry Ditch A dry ditch is present on the southern boundary and contains no aquatic vegetative species. Species composition is similar to that of the calcareous grassland albeit with a higher proportion of ruderal vegetation.	

Appendix 4 - Bat Activity Surveys

Methods

Survey Effort

During the walkover the Site was assessed as having Moderate suitability for bats in accordance with best practice guidance (Collins, 2023), based on the presence of woodland boundary habitats:

Moderate – Continuous habitat connected to the wider landscape providing shelter and/or invertebrate prey sources such as tree lines, scrub, water courses, linked back gardens and grassland.

Considering the predicted impacts of the proposed development on bats it was therefore proportionate to undertake automated detector surveys once a month between April and October 2025-2026, in accordance with Collins (2023) and BS42020 (BSI, 2013). These surveys were supplemented by three seasonal night-time bat walkover surveys.

Night-time Bat Walkover Surveys

Night-time bat walkover (NBW) surveys comprised two experienced surveyors observing and recording bat behaviour on Site. Surveys commenced 15 minutes before sunset, with surveyors positioned on potential flyways, or close to potential roost features, previously identified as part of the walkover survey. Starting locations were altered between surveys to assess the importance of different features to bats. Surveyors initially remained in place to record early emerging behaviour and commuting bats - tracking the bat movement towards a roost, if appropriate. After 30 minutes to an hour from sunset, surveyors then walked a pre-defined transect route (no more than 3km) covering all suitable foraging and commuting habitats within the Site. During the walked survey surveyors responded dynamically to bat activity on Site, occasionally stopping or detouring to observe bat behaviour. The survey concluded two hours after sunset/ when it became too dark to see bat activity.

Surveyors were equipped with a manual hand-held detector and recorder (Elekon Batlogger). When a bat was encountered the time, species and flight behaviour, direction and height was noted.

Surveys were completed during optimal weather conditions, as detailed in Table 4.1. Exceptions are discussed further in Limitations (Section X.X).

Table 4.1: Bat Activity Transect Survey Dates and Personnel

Date	Sunset/ start time	End time	Transect length (time)	Weather	Personnel
13/08/2025	20:17	22:32	2.25 hours	Dry, 18-21°C, 100% cloud cover (cc), wind (Beaufort) 0 – 3.	EEB, AR
09/10/2025	18:12	20:22	2.25 hours	Dry, 15-13°C, 100% cc, wind 0.	MW, AJ
09/04/2026	19:37	21:52	2.25 hours	Dry, 9-5°C, 40-10% cc, wind 0-1.	ET, RH

EEB = Eliane Bornoff BSc MbyRes; ET = Emma Thornton MBIol; MW = Mille Williams BSc; AJ = Adam Jeffries BSc; AR = Asher Rees BSc; RH = Ryan Hobbs BSc.

Automated Detector Surveys

Night-time bat walkover surveys were supplemented with the use of static automated detectors to increase survey effort.

This involved the deployment of two static detectors (Titley Scientific Anabat Swift or Wildlife Acoustics Song Meter SM2), in hedgerows and woodland edge. Locations were chosen through a “*judgmental*” strategy, considering features of greatest interest and those most likely to be impacted by proposals. Detectors were positioned on the leeward side of hedges and habitats, facing into the field, to avoid noise from wind and vegetation. Statics were deployed for a minimum of five nights per month between April and October 2025-2026, on the following dates:

- 🦇 9th – 13th April 2026;
- 🦇 6th – 10th May 2026;
- 🦇 2nd - 6th June 2026;
- 🦇 28th – 31st July 2025;
- 🦇 13th – 17th August 2025;
- 🦇 9th – 13th September 2025; and,
- 🦇 9th – 13th October 2025.

Bat Data Analysis

Recordings from NBW surveys were analysed through Wildlife Acoustics Kaleidoscope Pro software and processed through Microsoft Excel, R Statistical Software (R Core Team, 2021) and QGIS to produce a point map showing locations at which bat passes were recorded. The map was annotated to provide qualitative information about bat use of the Site, including key foraging areas and commuting routes.

The latest version of Wildlife Acoustics Kaleidoscope Pro software was used for processing and analysing static bat data. The confidence settings used were “liberal (this will produce more identifications but have more false positives)” with an audit of all recordings, including “noise” files. Batches of noise files and pipistrelle calls were checked depending upon their characteristics which are grouped by a range of variables including background noise and strength of calls. *Myotis*, long-eared (*Plecotus*) and *Nyctalus* species were identified to genus level. All bat calls other than common, soprano pipistrelle and *Nyctalus* species were verified manually in full, with at least 10% of calls checked again to confirm verification. A three-stage quality assurance process was undertaken, focusing on cryptic species. Where necessary further identification of more cryptic species such as *Myotis* and long-eared bats was undertaken using Titley Scientific Analook software.

Data from the automated surveys was then analysed and presented, using R Statistical Software (R Core Team, 2021). A bat pass is defined as a sequence of echolocation calls separated from another call by a minimum of 2 seconds. The number of bat passes per hour for each species was calculated (bat pass/night length), allowing comparison between different seasons and locations on Site. The time of calls relative to sunset/sunrise was also calculated, using the ‘bioRad’ R package, and considered in relation to expected emergence times for each species (Andrews and Pearson, 2022).

QGIS was used to produce a map showing static locations and Euler graphs of bat activity showing the passes per hour for all bat species, all bat species excluding pipistrelles, light averse species and Annex II species. Light averse species are defined as showing no positive or negligible effect from artificial light at night as shown in Table 1 of Bats and Artificial Lighting at Night Guidance Note 08/23 (BCT & ILP, 2023).

As they are a cryptic species, and are not recorded in proximity to the Site, any potential Bechstein’s have been aggregated with the other *Myotis* species and are not considered along with the Annex II species.

Results

Seven records of bat roosts were provided by WSBRC from the last ten years within 2km of the Site, a summary of the species and their legal/ conservation status is provided in Table 4.2 below.

Table 4.2: Summary of Bat Roost Records within 2km of Site (provided by WSBRC)

Species	Status/ Distribution in South-west England & South Wales ⁵	Record Summary
Common pipistrelle	EPS. Widely distributed.	One record, the closest located approximately 1.60km southwest from the Site.
Soprano pipistrelle	EPS, SPI. Widely distributed.	Four records, the closest being approximately 720m north from Site.
Brown long-eared bat and long eared species.	EPS, SPI. Widely distributed.	Two records, the closest being approximately 3.05km west of Site.

EPS = European Protected Species; Annex II = species listed in the Habitat Directives Annex II; SPI= Species of Principal Importance under S41 of NERC Act 2006.

MAGIC provided two records of roosting bats as shown in the table below.

Table 4.3: Bat Mitigation Licences Granted within 2km of the Site (MAGIC)

Licence No.	Species	Impact/ Roost Type	Dates of Licence	Distance from Site
EPSM2011-3675	Brown long-eared (EPS, SPI).	Destruction of a resting place	18/11/2011 - 30/09/2013	1.46km west of Site
EPSM2010-2618	Common pipistrelle (EPS), soprano pipistrelle (EPS, SPI), brown long-eared (EPS, SPI), serotine (EPS. Rare but widespread) and natterer's bat (EPS. Widespread in many geographies, but not abundant in all)	Destruction of a resting place	04/07/2011 - 30/09/2014	1.88km west of Site.

Night-time Bat Walkover Survey Results

During the NBW surveys, soprano pipistrelle (43.75% of activity) was the most frequently recorded species, followed by common pipistrelle (34.38%) and noctule (15.62%). Serotine (6.25%) were also recorded on Site in low numbers (Table 4.4).

⁵ Status/distribution according to the UK Bat Mitigation Guidelines (Reason and Wray, 2025).

Table 4.4: Summary of Total Bat Passes Recorded during NBW Surveys

Survey Month	PIPPIP	PIPPYG	CNESER	NYCSPP	Grand Total
April	1	0	0	0	1
August	10	14	2	4	30
October	0	0	0	1	1
Grand Total	11	14	2	5	32

PIPPIP = common pipistrelle; PIPPYG = soprano pipistrelle; NYCSPP = *Nyctalus* species; CNESER = Serotine.

Bat activity was concentrated along one of the four site boundaries, specifically the western edge (see **Figure 3**). Pipistrelle activity was largely confined to this boundary, which lies adjacent to a wooded area. Common pipistrelles were recorded in the north-western corner during both the spring and summer surveys.

Nyctalus activity was also focused along the western boundary. In contrast, serotine bats were only occasionally recorded across the site and did not show any clear spatial pattern.

Automated Detector Survey

During the automated detector surveys, statics were placed at the following locations (illustrated in **Figure 3**):

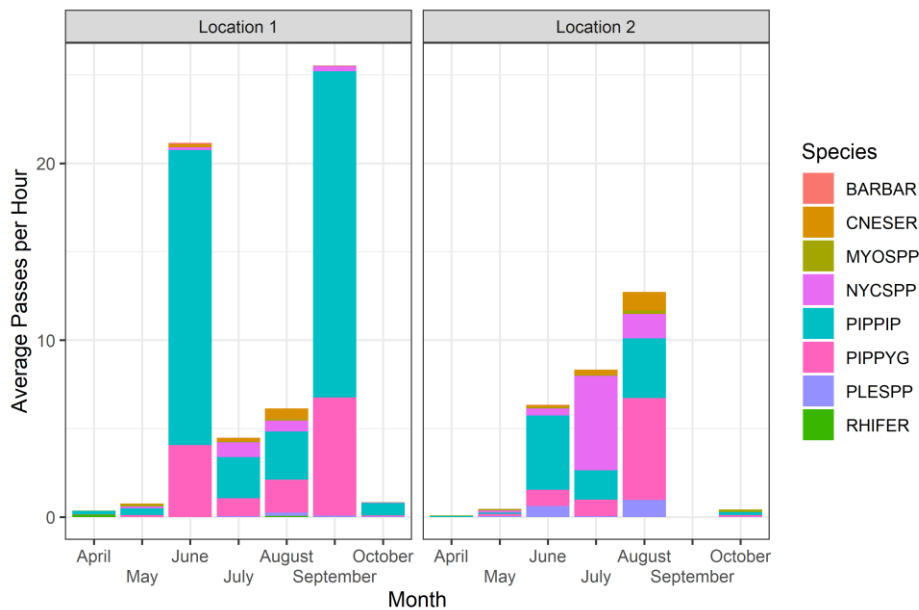
-  Location 1 – western hedgerow within trees;
-  Location 2 - northern boundary adjacent to grassland.

Graph 1 below illustrates the relative abundance of bat activity recorded during the survey period. Location 1 supported the highest number of bats passes per hour overall, though Location 2 recorded the most passes from species considered to be more light-averse.

Common pipistrelle was the most frequently recorded bat species (56.87% of recorded bat passes; 7.506 passes per hour across all surveys), followed by soprano pipistrelle (24.86%; 3.28 passes/hour). Both species showed greatest affinity to Location 1.

Nyctalus activity was also frequently recorded (11.39%; 1.503 passes/hour) with highest levels of activity at Location 2. However, it should be noted that due to the strength of noctule calls, this species can be detected from >100m and they also commute and forage over open habitat; therefore, it indicates that bats are using this general area of the Site, not necessarily the hedgerow itself.

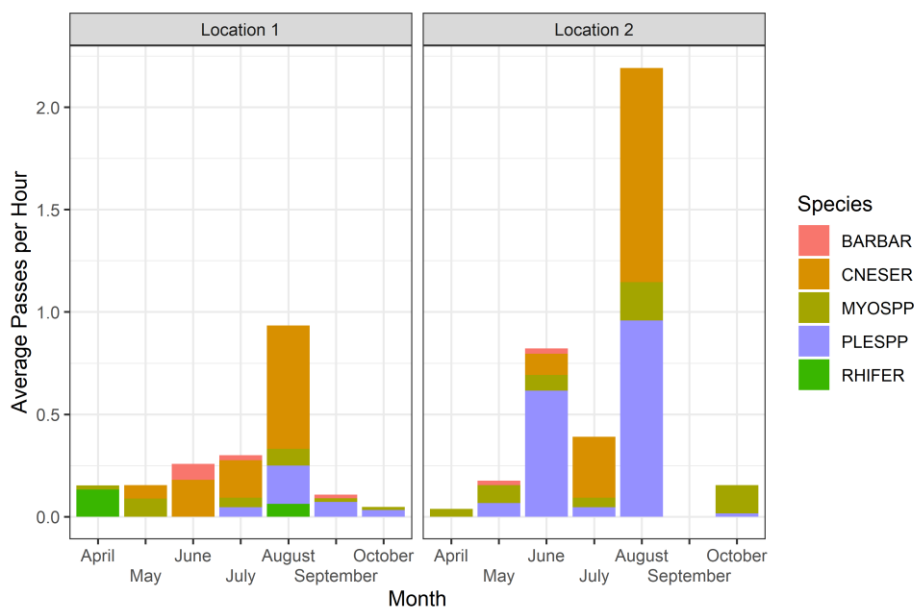
Graph 1: Average Bat Passes per Hour During the Automated Detector Survey Period



PIPPIP = common pipistrelle; PIPPYG = soprano pipistrelle; PIPNAT = Nathusius' pipistrelle; NYCSPP = *Nyctalus* species; CNESER = Serotine; MYOSPP = *Myotis* species; RHIHIP = lesser horseshoe bat.; RHIFER = greater horseshoe bat; BARBAR = barbastelle; CNESER = Long-eared bat species.

Graph 2 below excludes pipistrelles and noctules for a clearer picture of activity for other species⁶. Serotine were recorded occasionally on Site, showing the greatest affinity to Location 2 (2.94%; 0.39 passes/hour). *Myotis* species (1.02%; 0.14 passes/hour), which are considered to be more light averse, were recorded at all locations, but with highest levels of activity recorded at Location 2. Similarly, long-eared bats were recorded at each location (2.52%; 0.33 passes/hour), showing the greatest affinity to Location 2.

Graph 2: Average Bat Passes per Hour during the Automated Detector Survey Period, excluding Pipistrelles and *Nyctalus* sp.

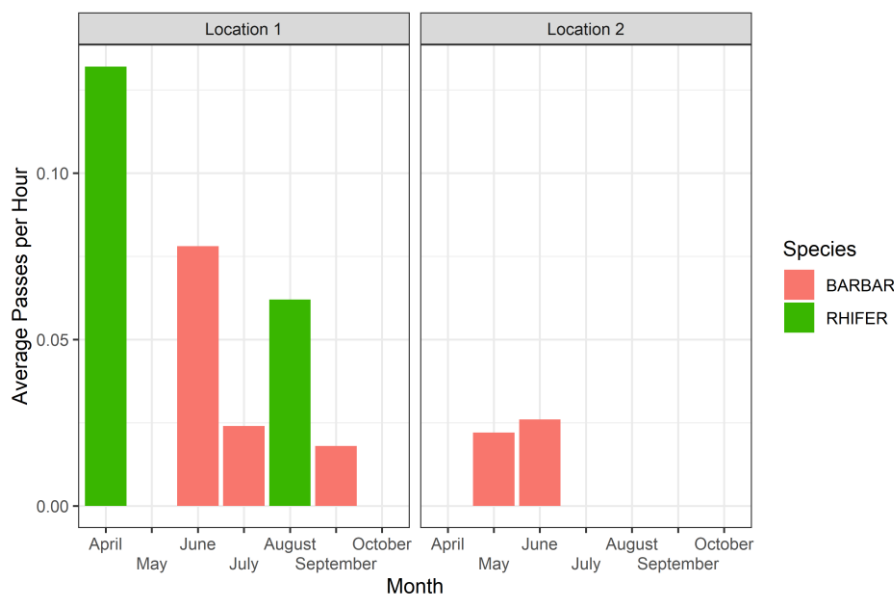


BARBAR = barbastelle; CNESER = Serotine; MYOSPP = *Myotis* species; PLESPP = Long-eared bat species.; RHIHIP = lesser horseshoe bat; RHIFER = greater horseshoe bat.

⁶ Pipistrelles are excluded due to the abundance of calls recorded, and noctule are excluded as they have strong calls that can be detected from >100m away and therefore do not specifically reflect levels of bat activity at the specific location of the detector.

Graph 3 illustrates the abundance of activity by Annex II species only. Low levels of activity by barbastelle and greater horseshoe bats were recorded on Site. Barbastelle (0.19%; 0.025 passes/hour) were recorded at all detector locations. Conversely, greater horseshoe (0.21%; 0.028 passes/hour) were only recorded at Location 1.

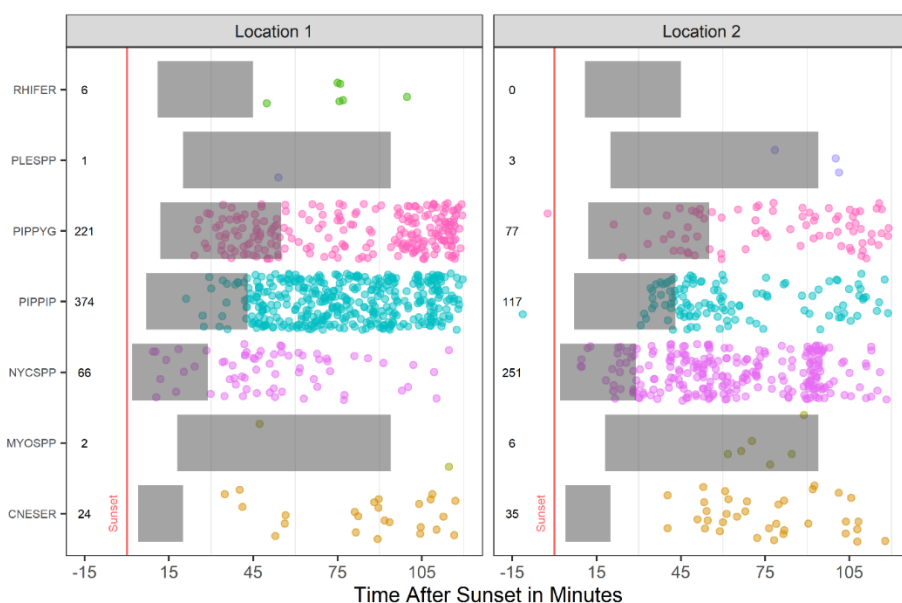
Graph 3: Average Bat Passes per Hour during the Automated Detector Survey Period, for Annex II species



BARBAR = barbastelle; RHIFER = greater horseshoe bat.

Graph 4 shows passes of species in relation to expected emergence times from Andrews and Pearson (2022), included on pp.34-35 in the BCT survey guidelines (Collins, 2023). The graph shows that common pipistrelle, soprano pipistrelle and *Nyctalus* species were recorded on Site during their expected emergence periods and therefore may be emerging from a roost nearby and commuting through the Site. These species are highly likely to be using the Site for foraging close to their roosting site/ commuting through the Site before heading further afield. Low numbers of *Myotis* and long-eared species at emergence indicates that there may be a roost in the vicinity, but that the Site does not appear to be of high importance as a commuting route. No recordings of serotine or greater horseshoe at emergence indicates the unlikelihood of a roost in the vicinity.

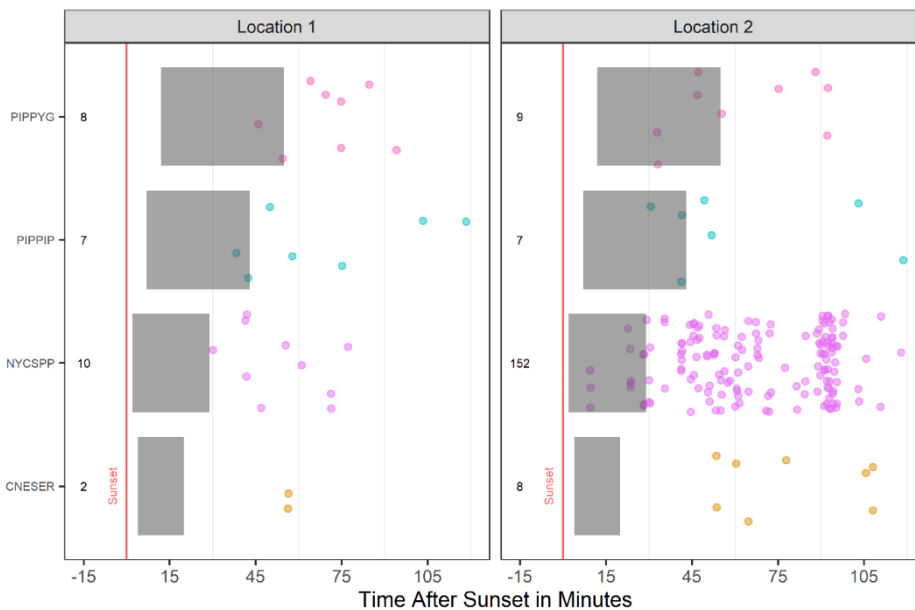
Graph 4: All bat passes in relation to emergence periods for each species



RHIFER = greater horseshoe bat; PLESPP = Long-eared bat species; PIPPIP = common pipistrelle; PIPPYG = soprano pipistrelle; NYCSPP = *Nyctalus* species; CNESER = Serotine; MYOSPP = *Myotis* species; BARBAR = barbastelle.

Graph 5 shows passes of species in relation to expected emergence times from Andrews and Pearson (2022), included on pp.34-35 in the BCT survey guidelines (Collins, 2023) during the maternity period of 15 June – 30 July. The graph shows that low numbers of common pipistrelle, soprano pipistrelle and *Nyctalus* bats were recorded on Site during their expected emergence period during the maternity period and therefore indicate that there may be a maternity roost in the vicinity, but that the Site does not appear to be of high importance as a commuting route. No recordings of serotine indicate the unlikelihood of a maternity roost in the vicinity.

Graph 5: All Bat Passes in Relation to Emergence Periods for each Species within the Maternity Period (15th June – 30th July)



PIPPYG = soprano pipistrelle; PIPPIP = common pipistrelle; NYCSPP = *Nyctalus* species; CNESER = Serotine;

Summary

Automated bat detector surveys recorded an assemblage of bat species across the Site, with activity dominated by common pipistrelle and soprano pipistrelle. Overall bat activity was highest at Location 1, while Location 2 supported the greatest levels of activity by more light-sensitive species, including *Myotis*, long-eared bats and serotine although passes from these species was infrequent.

Activity by light-averse and Annex II species was generally low. *Myotis*, long-eared bats and serotine were recorded at low frequencies across the Site, with the highest activity concentrated at Location 2. Annex II species were recorded only occasionally, comprising low levels of barbastelle activity across all detector locations and very limited greater horseshoe activity restricted to Location 1.

Analysis of activity relative to species-specific emergence periods suggests that common pipistrelle, soprano pipistrelle and *Nyctalus* species may be roosting within the local area and using the Site for commuting and/or foraging. Low levels of *Myotis* and long-eared bat activity during emergence periods indicate the possible presence of nearby roosts, although the Site does not appear to function as a particularly important commuting route for these species. The absence of emergence-period records for serotine and limited records of greater horseshoe bats indicate that roosts of these species are unlikely to be present in the immediate vicinity.

During the maternity season, only low levels of emergence-period activity were recorded for common pipistrelle, soprano pipistrelle and *Nyctalus* species, suggesting the possible presence of maternity roosts in



the wider area but indicating that the Site is not of particular importance as a commuting corridor associated with such roosts. No evidence of nearby serotine maternity roosts was identified.

The Site is predominantly used by common and widespread species, with most recorded activity comprising passes by light-tolerant bats. The south-eastern wooded boundary is of moderate importance for commuting and foraging bats and likely functions as a corridor facilitating movement into the wider landscape. Activity at Location 2 was lower; however, passes by light-averse species were recorded, albeit infrequently. This indicates that the north-western boundary is of limited importance for commuting and foraging bats and serves as a component of a broader commuting corridor.

Appendix 5 – Reptile Survey

Methods

Surveys to ascertain the likely presence/ absence of reptiles were undertaken following current good practice methodologies (Froglife, 1999). This involved the deployment of 50 0.5m x 0.5m artificial refuges (roofing felt) on 31 July 2025 by Adam Jeffries BSc in areas of suitable habitat.

Refuges were left to ‘bed-in’ for one week prior to a series of seven visits in which a search for reptiles was made both under/ on-top of refuges and within open habitats. Dates, personnel and weather conditions for visits are detailed in Table 5.1.

Table 5.1: Reptile Survey Dates and Weather Conditions

Visit	Date	Time	Surveyor	Temperature (°C)	Weather
1	07/08/2025	10:35-11:15	HK	19°C	100% cloud cover, calm and dry.
2	13/08/2025	19:20-19:50	EEB + AR	21°C	100% cloud cover, calm and dry.
3	18/08/2025	11:15-11:45	AR	20°C	100% cloud cover, calm and dry.
4	27/08/2025	9:00-9:30	CD	19°C	90% cloud cover, calm and slightly damp.
5	04/09/2025	10:00-10:30	NC	17°C	95% cloud cover, calm and dry.
6	09/09/2025	10:00-10:30	BS	16°C	95% cloud cover, calm and dry.
7	15/09/2025	11:00-11:50	AR	14°C	95% cloud cover, calm and wet.

Results

No reptiles were recorded during any of the surveys, indicating that it is unlikely the grassland or woodland boundaries on Site support a reptile population.



Appendix 6 – Consultation with WC on Nutrient Neutrality



File

Message

Help

Tell me what you want to do

Copilot

Ignore

Block

Delete

Archive

Report

Reply

Reply All

Forward

Meeting

IM

More

Share to Teams

All Apps

2104 Western Ex...

To Manager

Team Email

Done

Reply & Delete

Create New

Move

Rules

Send to OneNote

Actions

Assign Policy

Mark Unread

Categorize

Follow Up

Find

Related

Select

Read Aloud

Immersive Reader

Translate

Zoom

Reply with Scheduling Poll

Viva Insights

RE: Hampshire Avon Nutrient Neutrality

Summarize

BE

Burrows, Elizabeth <elizabeth.burrows@wiltshire.gov.uk>

To

Lindsay Taylor

Cc

PARRY-JONES Daniel

You replied to this message on 15/10/2025 15:19.

Hi Lindsay,

Thank you for your email regarding a potential development within the River Avon Hampshire catchment, situated on allocated employment land and comprising a police hub and a storage building of approximately 3,000m² and 1,500m² respectively, both intended for 24-hour use without overnight accommodation.

On the assumption that the development does not involve industrial processes that result in significant water usage or the discharge of phosphorus into the catchment, and that the development will not result in direct impacts on the river itself, it is likely that a Test of Likely Significance would conclude that there is no pathway for adverse effects on the SAC. Given the nature of the proposal (employment use) and the separation distance of approximately [insert distance] km between the SAC and the application site, the development would likely be screened out of requiring Appropriate Assessment under the Habitats Regulations.

Please note that this response does not constitute formal advice in relation to a planning application.

I hope this is helpful. Should you have any further queries, please contact the Case Officer assigned to the planning application

Kind regards,

Lizzie

25 August 2026

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