



Gaston Farm

Gaston

Holt

Trowbridge

BA14 6QA

**Biodiversity Statement and
Draft Biodiversity Gain Plan**

Luscinia Ecology

On behalf of

R. Greenman (Agriculture)



Document Properties

Reference	Revision	Date	Author	Reviewer
LUS25073 BS&BGP	Draft	09/06/2025	Greg Nightingale	Greg Nightingale
LUS25073 BS&BGP	Submission	26/06/2025	Greg Nightingale	Greg Nightingale



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Chapter 1: Biodiversity Statement

Do you believe that, if the development is granted permission, the general Biodiversity Gain Condition (as set out in Paragraph 13 of Schedule 7A of the Town and Country Planning Act 1990 (as amended) would apply?	Yes
Please provide the pre-development biodiversity value of the onsite habitats on the date of the calculation. <i>- If the planning portal only allows a single figure, we advise that the largest figure is used</i>	Habitat: 0.24 Hedgerow: 0.26 Watercourse: 0.0
Please provide the date the onsite pre-development biodiversity value was calculated.	20/05/2025
If an earlier date, to the date of the planning application, has been used, please provide details why this date has been used.	Date of the ecological survey
Which version of the biodiversity metric was used?	The Statutory Biodiversity Metric
When was the version of the biodiversity metric used published?	06/08/24
Please provide the reference or supporting document/plan names for the: 'Biodiversity metric calculation', 'Onsite irreplaceable habitat (if any)', and 'Onsite habitats existing on the date of the application for planning permission (if applicable)'.	LUS25073 BS&BGP
Does the pre-development biodiversity value and date used above factor in the loss of any onsite habitat because of activities carried out before the submission of this application? (i.e., has degradation occurred?)	No, degradation has not occurred
Does the development site have irreplaceable habitats (corresponding to the description in column 1 of [Schedule to the biodiversity Gain Requirements (Irreplaceable Habitat) Regulations (2023)] which are: i. on land to which the application relates; and ii. existed on the date of the application for planning permission, (or an earlier agreed date)	No
The name and address of the person submitting this plan:	Simon Chambers LPC (Trull) Ltd Trull Tetbury Gloucestershire GL8 8SQ
Luscinia Ecology Ltd has provided the above Biodiversity Statement and this report in good faith and using reasonable care and due diligence. However, in relation to statement around degradation and any associated retrospective assessment, Luscinia Ecology Ltd cannot be held accountable or liable for inaccuracies or alternative interpretations.	



Chapter 2: Summary

- 2.1 The Statutory Biodiversity Metric has been completed in relation to Gaston Farm, Gaston, Holt, Trowbridge, BA14 6QA.
- 2.2 Current Biodiversity Net Gain policy requirements relating to development in the Wiltshire Council area require a 10% Biodiversity Net Gain outcome.
- 2.3 This assessment has been based upon a site visit and has been completed by an ecologist experienced in the Biodiversity Net Gain Assessment process. Full methods and assessments are included within this report. The completed Statutory Biodiversity Metric excel file will be submitted alongside this report.
- 2.4 Following the Mitigation Hierarchy and the Biodiversity Gain Hierarchy, the Proposed Development will not remove any irreplaceable habitats, or habitats of very high, high, or medium distinctiveness.
- 2.5 Proposed Development will achieve a Biodiversity Net Gain of 0.04 habitat units (+18.30%) and 0.10 hedgerow units (+39.53%), with the Trading Rules met.
- 2.6 This assessment has been undertaken using illustrative design. The measures within this report should be secured by conditions for a Soft Landscape Plan or similar.
- 2.7 The applicant is aware of, and has committed to, all the mitigation, compensation, and enhancement measures set out within this report.
- 2.8 Based on the results from the survey, context of the Site, and overall low ecological importance of the Site, this report is valid for a period of 18 months (i.e., the 20/11/2026).



Chapter 3: Introduction

Planning Context

3.1 This report sets out a Biodiversity Statement and Draft Biodiversity Gain Plan in relation to Gaston Farm, Gaston, Holt, Trowbridge, BA14 6QA (referred to as ‘the Site’ throughout this report). This report is supported by a site visit undertaken on 20/05/2025 and a Preliminary Ecological Appraisal¹.

3.2 The Environment Act 2021 sets out a mandatory requirement for all planning permissions in England (with a few exemptions) to deliver a 10% Biodiversity Net Gain (BNG) using the Statutory Biodiversity Metric.

3.3 In accordance with the National Planning Policy Framework (NPPF)² proposals should seek to demonstrate BNG. The NPPF states:

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

...

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;”

3.4 And:

“To protect and enhance biodiversity and geodiversity, plans should:

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

3.5 There are no current local policies, Supplementary Planning Guidance, or Supplementary Planning Documents in the Wiltshire Council area which relate to the BNG assessment process. However, the Local Plan³ is under review as of February 2025, with a view to implement a minimum of 20% BNG⁴. This is not yet policy but should be reviewed dependent on the submission date of the planning application.

3.6 In accordance with Environment Act, NPPF, and Wiltshire Council policies, the Proposed Development has a targeted BNG outcome of at least 10%.

¹ Luscinia Ecology (2025). *Gaston Farm, Gaston, Holt, Trowbridge, BA14 6QA: Preliminary Ecological Appraisal: LUS25073 PEA Submission*. Luscinia Ecology, Bristol.

² MHCLG (2025). *National Planning Policy Framework*. February 2025. Ministry of Housing, Communities and Local Government, London.

³ Available at: <https://www.wiltshire.gov.uk/planning-policy-core-strategy>

⁴ Available at: <https://www.wiltshire.gov.uk/planning-bio-development>



Site Description

- 3.7 The Site is located along the B3106 between Staverton and Holt, to north of Trowbridge, Wiltshire. The Site includes a length of native hedgerow set between the B3106 road to the west and grassland to the east. The hedgerow and grassland form part of a wider network of farmland (**Figure 1**).



Figure 1. Aerial image – Site boundary in red line⁵

Proposed Development

- 3.8 The Proposed Development includes the creation of a new field access and the closure of an existing access via the planting of a section of hedgerow (**Figure 2**). No other works will take place. The construction footprint will be minor, and construction will be completed using small machinery and hand tools. The impacts are expected to be localised and small in scale.

⁵ Image used under licence (©2024 Google): Accessed: 09/06/2025.



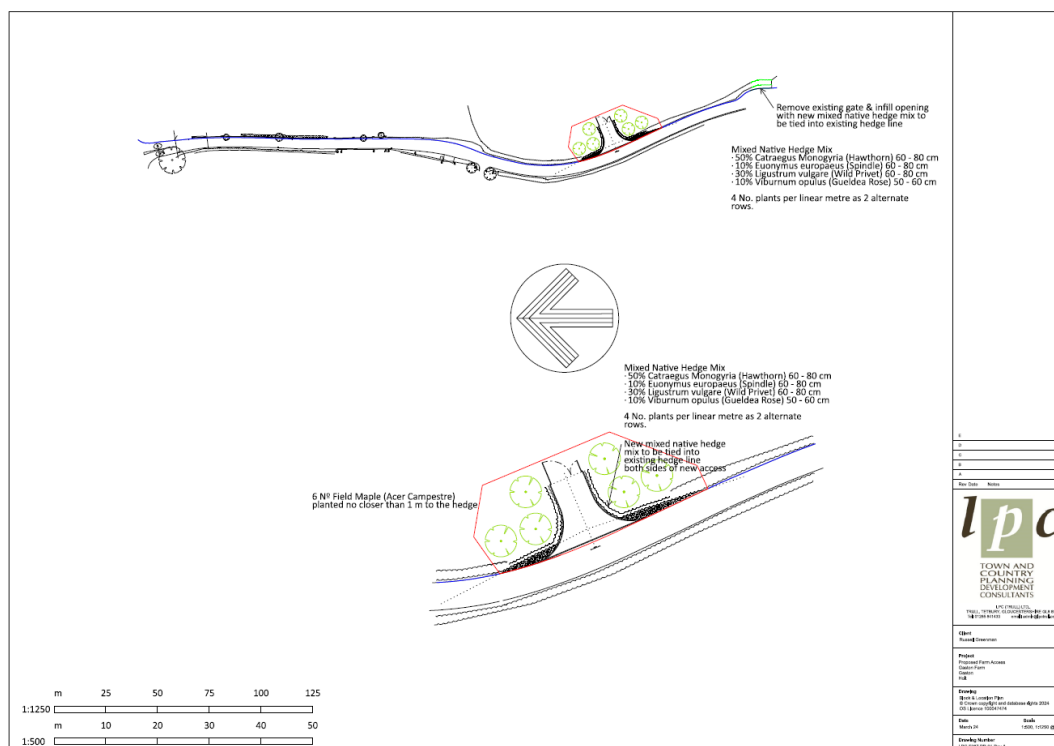


Figure 2. The Proposed Development

Purpose of this report

- 3.9 The purpose of this report is to provide sufficient information for the Local Planning Authority to fully assess the ecological impacts of the Proposed Development, via the BNG Assessment process.
- 3.10 The key objectives of this Biodiversity Statement and Draft Biodiversity Gain Plan are to:
- Determine the BNG percentage required to be delivered by the Proposed Development.
 - Outline the BNG Assessment method, including any limitations, assumptions, clarifications, and/or deviations.
 - Follow the Mitigation Hierarchy and the Biodiversity Gain Hierarchy, and outline if irreplaceable habitats will be lost.
 - Undertake the BNG Assessment:
 - Determine the BNG on-site baseline using the data search, ecological reporting, BNG Condition Assessments, and The Statutory Biodiversity Metric.
 - Determine the BNG on-site post development outcome, using the details within **Figure 2**.
 - Compare the on-site baseline with the on-site post development outcome to determine the overall BNG net change.



- Outline the agreed management activities, including the identification of the On-site Significant Enhancements.
- Outline the agreed monitoring and adaptive management requirements.
- Determine if a require percentage increase in BNG has been achieved, or the measures required to achieve the BNG.



Chapter 4: Method

Biodiversity Net Gain

- 4.1 Calculations have been carried out with regards to Biodiversity Net Gain: Good Practice Principles for Development guidance⁶ and in line with the Statutory Biodiversity Metric guideline⁷. **Appendix A** sets out how each of the BNG Good Practice Principles⁸ have been applied. In this way, this report meets **Principle 3** of The Statutory Biodiversity Metric.
- 4.2 The Statutory Biodiversity Metric is the established method for calculating BNG and provides a quantitative approach to losses and gains resulting from development or land management changes. Whilst The Statutory Biodiversity Metric is the default system of calculating BNG, it should not be considered a complete tool in assessing BNG and therefore professional judgement has been used where appropriate (this includes consideration of Environmental Net Gain (ENG)). Where professional judgement has been used, this is outlined in the text, and additional references have been provided. This is in line with **Principles 4 and 6** of The Statutory Biodiversity Metric:

“Principle 4: This biodiversity metric is not a complex or comprehensive ecological model and is not a substitute for expert ecological advice.”

...

Principle 6: This biodiversity metric is designed to inform decisions in conjunction with locally relevant evidence, expert input, or guidance.”

Site Visit

- 4.3 The Site was surveyed using the UK Habitat Classification Survey⁹ method on 20/05/2025. The method classified the Site into areas of similar botanical community types with a representative sample of those species present at the time of the survey being described. The vegetation present was clearly visible and allowed an accurate assessment to be made. During the Site survey, The Statutory Biodiversity Metric Condition Assessment sheets¹⁰ were used to gather the necessary ecological information to determine the condition of the habitats present within the Site.
- 4.4 A UK Habitat Classification Plan was produced (**Figure 3**), which formed the On-Site Baseline Map.

⁶ Baker J., Hoskins R., and Butterworth T. (2019). *Biodiversity Net Gain. Good practice principles for development: A practical guide*. Ciria, London.

⁷ Defra (2024). *The Statutory Biodiversity Metric: User Guide: Date July 23rd 2024*. Department for Environment food and rural affairs, London.

⁸ Baker J., Hoskins R., and Butterworth T. (2016). *Biodiversity Net Gain. Good practice principles for development*. Ciria, London.

⁹ UKHab Ltd (2023). *UK Habitat Classification Version 2.0*. UKHab Ltd, Stockport.

¹⁰ Defra (2024). *The Statutory Biodiversity Metric: Technical Annex 1: Condition Assessment Sheets and Methodology: Date February 2024*. Department for Environment food and rural affairs, London.





Figure 3. UK Habitat Classification Plan

- 4.5 Based on the results of the surveys used to inform this assessment, the context of the Site, and the high likelihood that the habitats within the Site will not change significantly over time, this report is valid for a period of 18 months (i.e., the 20/11/2026). It is reasoned that there would be no material change on Site within this time period. This is reasoned in line with good practice guidelines¹¹.

Baseline Calculation

- 4.6 To calculate the baseline area and linear units for the Site the following data and assessments were undertaken:
- The UK Habitat Classification habitats were converted, where necessary into the relevant habitats within The Statutory Biodiversity Metric.
 - The UK Habitat Classification 25m² rule was applied¹².
 - The habitats were then assigned a pre-set distinctiveness grade¹³.
 - The area (hectares) of each habitat parcel and length of linear habitats (km) within the Site was calculated from the On-site Baseline Map (**Figure 3**).
 - Scattered trees were calculated using the Tree Helper Tool, following the size guidelines within The Statutory Biodiversity Metric User Guide and using either data collected directly by the ecologist or via information within the Proposed

¹¹ CIEEM (2019). Advice Note: *On the Lifespan of Ecological Reports and Surveys*. Chartered Institute for Ecology and Environmental Management, Winchester

¹² Habitats occupying less than 25m² were absorbed and considered within the adjacent habitat(s).

¹³ Indicative of the inherent 'value' of the habitat.



Development's Tree Schedule, with the use of a Tree Schedule taking precedence.

- Where applicable, habitats were subject to a 'condition assessment'¹⁴.
- Habitats were subject to a strategic significance assessment¹⁵.

4.7 The baseline habitats (as detailed above) were entered into The Statutory Biodiversity Metric to calculate baseline biodiversity units for the Site.

Proposed Development Assessment

4.8 Using the Proposed Development shown **Figure 2**, an On-site Post Intervention Map (**Figure 4**) was produced.



Figure 4. On-site Post Intervention Map

4.9 In relation to created and enhanced habitats, all habitat interventions within this report are considered to be realistic and deliverable within the project time frame (in line with **Principle 7** of The Statutory Biodiversity Metric), along with the expected or agreed management resources and availability of funding.

4.10 The same process as for the baseline calculation was completed using the On-site Post Intervention Map (**Figure 4**), along with the following additional methods:

¹⁴ The 'condition' of the habitat is a measure of habitat quality and measures the 'working-order' of the habitat against the optimal state of the habitat type.

¹⁵ Strategic significant is based upon the location of a habitat within the local landscape and whether the location has been formally identified in plans which identify local priorities for targeting biodiversity.



- The loss of baseline habitats was calculated by overlaying the footprint of the proposals onto the On-Site Baseline Map.
- The On-site Post Intervention Map was reviewed to identify habitats retained, enhanced, and/or created. The proposed habitats were subject to condition and strategic significance assessments.
- Where a new habitat or existing habitat has been created or enhanced, additional consideration has been given towards the time taken for habitats to establish and reach target condition (temporal multiplier), and the difficulty of habitat re-creation (difficulty multiplier). The 'Habitat creation in advance' and 'Delay in starting habitat creation' functions were set to 0 years. No advanced habitat creation is proposed, and there will be no 'delay between habitat loss and the start of habitat creation and enhancement works'.

Strategic Significance

- 4.11 The Wiltshire and Swindon Local Nature Recovery Strategy (LNRS) is under development and is not yet publicly available. The LNRS is set to be published by the end of 2025. The Site location is not a target area identified within the Wiltshire Biodiversity Action Plan (BAP)¹⁶.
- 4.12 As such, the Site is not located within a strategically significant ecological area. The strategic significance of the habitats within the Site were assessed as 'Area/compensation not in local strategy/no local strategy'.

Data Summary and Discussion

- 4.13 The Statutory Biodiversity Metric presents a detailed summaries of the resultant biodiversity unit change, separated by habitat type.
- 4.14 A biodiversity unit change has been provided habitat units, hedgerow units, and watercourse units. However, caution has been applied when interpreting these numbers. It is important to note that BNG should assess habitats in isolation and any unit losses or gains considered in detail. This assessment includes consideration of the effect of the proposals on each habitat group, and like-for-like replacement within broad habitat groups.
- 4.15 The discussion also considers the wider context of the outline planning application, surrounding landscape, wider ecological functions not captured by the BNG assessment process, and socio-economic values of the development, as well as considering how the Proposed Development contributes towards nature conservation priorities at the local, regional, and national levels. This approach is guided by Principles 6 and 9 of BNG Good Practice Principles⁸, along with **Principles 8 and 9** of The Statutory Biodiversity Metric:

¹⁶ Wiltshire County Council, Wiltshire Wildlife Trust, and Natural England (2008). *Wiltshire Biodiversity Action Plan*. Wiltshire County Council, Wiltshire.



“Principle 8 Created and enhanced habitats should be, where practical and reasonable, local to any impact and deliver strategically important outcomes for nature conservation.

...

Principle 9 This biodiversity metric does not enforce a minimum habitat size ratio for compensation of losses. Proposals should aim to:

- *maintain habitat extent - supporting more, bigger, better, and more joined up ecological networks*
- *ensure that proposed or retained habitat parcels are of sufficient size for ecological function”*

4.16 Our digital data and mapping files are available upon request.

Limitations, Assumptions, and Clarifications

Limitations

4.17 The measurements within this report are approximate and the mapping of baseline habitats and proposed development plans has relied upon the plans provided by the client and/or project team. These plans were georeferenced. Mapping of habitats at a fine scale may result in minor deviations from realised measurements. Given the scale of the proposals, any deviations in spatial areas or point locations are sufficiently minor to be inconsequential. Nevertheless, this has been controlled for via advanced digitising tools and precautionary rounding.

Assumptions

4.18 None.

Clarifications

4.19 None.

Contributor Information

4.20 The Site visit, BNG Condition Assessments, BNG Assessment, and BNG report were completed by Greg Nightingale. A technical review of this assessment was undertaken by Greg Nightingale. **Table 1** outlines the relevant experience of the assessment contributor.



Contributor	Experience
Greg Nightingale BSc (Hons) MCIEEM	Greg is the Director of Luscinia Ecology with over 11 years of experience in ecology and environmental management in the private sector. Luscinia Ecology is a CIEEM Registered Practice and Greg Nightingale is a full member of the Chartered Institute of Ecology and Environmental Management (CIEEM). CIEEM act to govern best practice in the ecology sector. Greg has been working on BNG since 2017, prior to its inclusion within the National Planning Policy Framework (2018 revision) and the Environment Act 2021. This has included working with all the Defra Metrics, The Warwickshire Model, BREEAM 2018, and the Network Rail BNG Model. Greg has established and developed BNG systems and processes in three small to medium sized ecological consultancies and is highly experienced in the application of BNG at the site and local level, including delivering BNG offsetting and contributions via S106 Agreements, third parties, and brokers. within this, Greg is experienced in UK Habitat Classification, and BNG condition assessment. This includes the completion of the industry standard training courses for BNG, UK Habitat Classification, and the crossover training for BNG and UK Habitat Classification. He is an accredited Modular River Survey River Condition Assessment surveyor. His experience has also included habitat mapping and assessment via drones and aerial footage. In addition, he has completed a CIEEM training course on Environmental Net Gain and has a foundational understanding of The Environmental Benefits from Nature Tool and how this relates to the BNG assessment process.

Table 1. Contributor experience



Chapter 5: Baseline and Proposed Development

Irreplaceable habitats

5.1 No irreplaceable habitats will be removed as a result of the Proposed Development.

Baseline Assessment

5.2 The habitats present within the Site are set out below:

- **Grassland:** Modified grassland
- **Hedgerow:** Native hedgerow
- **Urban:** Developed land; sealed surface

5.3 The assessment of the character, extent, condition, historic management, and species composition of these habitats is outlined within the PEA¹ and the condition assessment tables within **Appendix B**.

5.4 Developed land; sealed surface does not require condition assessment.

Proposed Development Assessment

5.5 The below is based on the On-site Post Intervention Map shown in **Figure 4**. Assessment of the proposals is split into three sections, as detailed below:

- Retained/Lost habitats, which identifies habitats retained and protected during the implementation of the proposals and those to be removed.
- Enhanced Habitats, which assesses habitats which will be created as part of the proposals, and outlines measures as to how these habitats will reach target condition.
- Created Habitats, which assesses habitats which will be created as part of the proposals, and outlines measures as to how these habitats will reach target condition.

Habitats Retained/Lost

5.6 The modified grassland and native hedgerow will be removed.

Habitats Enhanced

5.7 None of the retained habitats were capable of being enhanced.

Habitats Created

5.8 The Proposed Development will provide the following:



- **Hedgerow:** Species-rich native hedgerow
- **Urban:** Developed land; sealed surface

5.9 None of the habitat creation was assessed to comprise on-site significant enhancement.

Hedgerow: Species-rich native hedgerow

5.10 A Species-rich native hedgerow will be planted as part of the Proposed Development. The hedgerow will be managed to meet the following condition criteria: height, width, gap – hedge base, gap – hedge canopy connectivity, undisturbed ground, invasive and neophyte species, and damage. A ‘good’ condition for the hedgerow can be achieved (matching the existing adjacent hedgerows).

Urban: Developed land; sealed surface

5.11 This habitat is not discussed further as it is of negligible importance and does not require a condition assessment.



Chapter 6: Results and Summary

6.1 Decision making during the development of the proposals has been informed and influenced by the Biodiversity Net Gain: Good Practice Principles for Development guidance⁸ to ensure these obligations for achieving BNG have been met. In addition, throughout the construction of the Proposed Development, these principles will be adhered to.

Results

6.2 The headline results demonstrate a net gain of 0.04 habitat units (+18.30%) and 0.01 hedgerow units (+39.53%), with the Trading Rules met (**Figure 5**). As there are no watercourse units in the baseline, there is no requirement to provide a net gain in these units.

FINAL RESULTS		
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	<i>Habitat units</i>	0.04
	<i>Hedgerow units</i>	0.10
	<i>Watercourse units</i>	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	<i>Habitat units</i>	18.30%
	<i>Hedgerow units</i>	39.53%
	<i>Watercourse units</i>	0.00%
Trading rules satisfied?	Yes ✓	

Figure 5. Headline results of The Statutory Biodiversity Metric

Biodiversity Gain Hierarchy

6.3 Application of the Biodiversity Gain Hierarchy is a mandatory material consideration. The Proposed Development implemented the Biodiversity Gain Hierarchy as follows:

- **Avoidance** – The Proposed Development will be located on a previously developed Site (road) and habitats of poor quality (modified grassland).
- **Avoidance** – The Proposed Development will not remove any irreplaceable habitats, or habitats of very high, or high distinctiveness
- **Avoidance** – The Proposed Development has limited the loss of habitat on Site.
- **Mitigation** – The Proposed Development will protect retained habitats and will minimised impacts on these habitats¹
- **Enhancement** – None of the retained habitats were capable of being enhanced.
- **Creation** – Opportunities for habitat creation within the Site have been explored and realistic opportunities and interventions have been agreed



- **Offsetting** – Is required and will follow the biodiversity gain hierarchy in relation to securing Biodiversity Units / Credits.

Summary

- 6.4 The Proposed Development will meet legislation and policy requirements in relation to Biodiversity Net Gain via the biodiversity offsetting process. The biodiversity gain condition, which applies to the Proposed Development, is capable of being discharged.
- 6.5 We advise that a planning condition should be sufficient to secure the long-term management and maintenance of the on-site significant enhancements contained within this report.
- 6.6 We reason that sufficient information is contained within this report in relation to habitat management and monitoring. Therefore, we reason that a draft Habitat Management and Monitoring Plan (HMMP) is not required prior to determination.
- 6.7 The above Biodiversity Net Gain Assessment is based upon the information available at the time of the assessment. Therefore, this assessment has been based upon illustrative landscape design. A planning condition will be required to ensure that the contents of this assessment are reflected within the Soft Landscape Proposals (or similar)



Appendix A: Delivery of Good Practice Principles

BNG Principle	Application
Principle 1. Apply the Mitigation Hierarchy <i>Do everything possible to first avoid and then minimise impacts on biodiversity. Only as a last resort, and in agreement with external decision-makers where possible, compensate for losses that cannot be avoided. If compensating for losses within the development footprint is not possible or does not generate the most benefits for nature conservation, then offset biodiversity losses by gains elsewhere.</i> Principle 2. Avoid losing biodiversity that cannot be offset by gains elsewhere <i>Avoid impacts on irreplaceable biodiversity – these impacts cannot be offset to achieve No Net Loss or Net Gain.</i> Principle 3. Be inclusive and equitable <i>Engage stakeholders early, and involve them in designing, implementing, monitoring and evaluating the approach to Net Gain. Achieve Net Gain in partnership with stakeholders where possible and share the benefits fairly among stakeholders.</i>	The Proposed Development is located on a grazed field. The Mitigation Hierarchy and the Biodiversity Gain Hierarchy have been applied throughout the planning and design process. The features of ecological importance within the Site will be retained and enhanced as part of the Proposed Development. The loss of a short section of hedgerow is not considered significant There will be no loss of irreplaceable habitats and the habitats lost are replaceable or were unnatural/modified in nature. Engagement with stakeholders, including local residents and the Local Planning Authority will be undertaken as part of the planning application.
Principle 4. Address risks <i>Mitigate difficulty, uncertainty and other risks to achieving Net Gain. Apply well-accepted ways to add contingency when calculating biodiversity losses and gains in order to account for any remaining risks, as well as to compensate for the time between the losses occurring and the gains being fully realised.</i>	Any limitations from the habitat survey and previous survey work have been considered and the precautionary principle applied during the baseline and proposed assessment where required. The Proposed Development assessment primarily uses basic habitats which require limited management to achieve the proposed outcomes. There is a clear statement in relation to the outcome of the Trading Rules. All other risks are dealt with via the Ecological Impact Assessment process and/or planning conditions, where considered required.
Principle 5. Make a measurable Net Gain <i>Achieve a measurable, overall gain for biodiversity and the services ecosystems provide while directly contributing towards nature conservation priorities.</i>	The Statutory Biodiversity Metric has been used. Use of the 'Environmental Benefits from Nature Tool' to consider ecosystem services is not yet part of policy and voluntary use was not considered proportionate to the nature and scope of this Proposed Development.
Principle 6. Achieve the best outcomes for biodiversity <i>Achieve the best outcomes for biodiversity by using robust, credible evidence and local knowledge to make clearly-justified choices when:</i> <i>Delivering compensation that is ecologically equivalent in type, amount and condition, and that accounts for the location and timing of biodiversity losses.</i> <i>Compensating for losses of one type of biodiversity by providing a different type that delivers greater benefits for nature conservation</i> <i>Achieving Net Gain locally to the development while also contributing towards nature conservation priorities at local, regional and national levels.</i> <i>Enhancing existing or creating new habitat.</i> <i>Enhancing ecological connectivity by creating more bigger, better and joined areas for biodiversity.</i>	The loss of ecologically important habitats has been avoided. The BNG assessment process will ensure that the ecological compensation provided is ecologically equivalent in type, amount, and condition and that the Trading Rules will be met. This will be achieved via Biodiversity Offsetting. The local environment and local wildlife priorities have been considered through the Ecological Impact Assessment process, namely via the provision of enhancement which target NERC/BAP species.
Principle 7. Be additional <i>Achieve nature conservation outcomes that demonstrably exceed existing obligations (i.e. do not deliver something that would occur anyway).</i>	The additionality principle has not been contravened.
Principle 8. Create a Net Gain legacy <i>Ensure Net Gain generates long-term benefits by:</i> <i>Engaging stakeholders and jointly agreeing practical solutions that secure Net Gain in perpetuity.</i> <i>Planning for adaptive management and securing dedicated funding for long-term management.</i> <i>Designing Net Gain for biodiversity to be resilient to external factors, especially climate change.</i> <i>Mitigating risks from other land uses.</i> <i>Avoiding displacing harmful activities from one location to another.</i> <i>Supporting local-level management of Net Gain activities.</i>	Engagement with stakeholders, including local residents and the Local Planning Authority will be undertaken as part of the planning application. Compensatory hedgerow planting is proposed. This measure will maintained connectivity for wildlife. Biodiversity offsetting will compensate for residual losses. The overall impact on habitats from the Proposed Development will be positive. This will be the BNG legacy of the Site.
Principle 9. Optimise Sustainability <i>Prioritise Biodiversity Net Gain and, where possible, optimise the wider environmental benefits for a sustainable society and economy.</i>	Use of the 'Environmental Benefits from Nature Tool' to consider ecosystem services is not yet part of policy and voluntary use was not considered proportionate to the nature and scope of this Proposed Development.
Principle 10. Be transparent <i>Communicate all Net Gain activities in a transparent and timely manner, sharing the learning with all stakeholders.</i>	The surveys and data that underpin this assessment have been made clear, including any limitations and assumptions. The methods used in this assessment are clearly set out in the method and follows guidelines. The assessment outcomes have been explained in full. This includes the inclusion of notes within the excel file to explain reasoning and full explanations for how existing and proposed habitat conditions will be



achieved. Next steps, and the measures required to ensure this Biodiversity Net Gain Assessment outcome will be achieved, have been clearly set out within the Summary and Discussion. This includes a statement that outlines the recommended next steps. All requirements within this report have been discussed and agreed with the Applicant.



Appendix B: Condition Assessment Tables

UKHabs Classification:		Grassland: Modified Grassland
Condition Sheet:		Modified Grassland (low distinctiveness)
Survey Date and Surveyor:		20/05/2025 – Greg Nightingale
Condition Assessment Criteria		
A	There are 6-8 vascular plant species per m ² present, including at least 2 forbs (these may include those listed in Footnote 1). Note - this criterion is essential for achieving Moderate or Good condition. Where the vascular plant species present are characteristic of medium, high or very high distinctiveness grassland, or there are 9 or more of these characteristic species per m ² (excluding those listed in Footnote 1), please review the full UKHab description to assess whether the grassland should instead be classified as a higher distinctiveness grassland. Where a grassland is classed as medium, high, or very high distinctiveness, please use the relevant condition sheet.	Pass – On average six species present per m ² over two quadrats
B	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed.	Fail
C	Any scrub present accounts for less than 20% of the total grassland area (Some scattered scrub such as bramble may be present). Note - patches of scrub with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.	Pass
D	Physical damage is evident in less than 5% of total grassland area. Examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities.	Fail – Various areas of damage across the grassland
E	Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens).	Pass
F	Cover of bracken is less than 20%.	Pass
G	There is an absence of invasive non-native plant species (as listed on Schedule 9 of WCA)	Pass
Condition Assessment Outcome		
Passes 6 or 7 criteria including passing essential criterion A.		Good
Passes 4 or 5 criteria including passing essential criterion A.		Moderate
Passes 3 or fewer criteria; OR Passes 4 - 6 criteria (excluding criterion A).		Poor



UKHabs Classification:		Hedgerow: Native Hedgerow
Condition Sheet:		Hedgerow Habitat Types
Survey Date and Surveyor:		20/05/2025 – Greg Nightingale
Functional groupings	Criteria (the minimum requirements for ‘favourable condition’)	Description
A1: Height	>1.5 m average along length.	The average height of woody growth estimated from base of stem to the top of the shoots, excluding any bank beneath the hedgerow, any gaps or isolated trees. Newly laid or coppiced hedgerows are indicative of good management and pass this criterion for up to a maximum of four years (if undertaken according to good practice). A newly planted hedgerow does not pass this criterion (unless it is >1.5 m height). The average width of woody growth estimated at the widest point of the canopy, excluding gaps and isolated trees. Outgrowths (such as blackthorn suckers) are only included in the width estimate when they are >0.5 m in height. Laid coppiced, cut and newly planted hedgerows are indicative of good management and pass this criterion for up to a maximum of four years (if undertaken according to good practice).
A2: Width	>1.5 m average along length.	
B1: Gap – Hedge base	Gap between ground and base of canopy <0.5 m for >90% of length.	This is the vertical ‘gappiness’ of the woody component of the hedgerow, and its distance from the ground to the lowest leafy growth. Certain exceptions to this criterion are acceptable (see page 65 of the Hedgerow Survey Handbook). This is the horizontal ‘gappiness’ of the woody component of the hedgerow. Gaps are complete breaks in the woody canopy (no matter how small). Access points and gates contribute to the overall ‘gappiness’ but are not subject to the >5 m criterion (as this is the typical size of a gate).
B2: Gap - hedge canopy continuity	Gaps make up <10% of total length; and No canopy gaps >5 m.	
C1: Undisturbed ground and perennial vegetation	>1 m width of undisturbed ground with perennial herbaceous vegetation for >90% of length: Measured from outer edge of hedgerow; and Is present on one side of the hedgerow (at least).	This is the level of disturbance (excluding wildlife disturbance) at the base of the hedgerow. Undisturbed ground is present for at least 90% of the hedgerow length, greater than 1 m in width and must be present along at least one side of the hedgerow. This criterion recognises the value of the hedgerow base as a boundary habitat with the capacity to support a wide range of species. Cultivation, heavily trodden footpaths, poached ground etc. can limit available habitat niches. The indicator species used are nettle, cleavers, and docks. Their presence, either singly or together, does not exceed the 20% cover threshold.
C2: Nutrient-enriched perennial vegetation	Plant species indicative of nutrient enrichment of soils dominate <20% cover of the area of undisturbed ground.	
D1: Invasive and neophyte species	>90% of the hedgerow and undisturbed ground is free of invasive non-native plant species (including those listed on Schedule 9 of WCA) and recently introduced species.	Recently introduced species refer to plants that have naturalised in the UK since AD 1500 (neophytes). Archaeophytes count as natives. For information on archaeophytes and neophytes see the JNCC website, as well as the BSBI website where the ‘Online Atlas of the British and Irish Flora’ contains an up-to-date list of the status of species. For information on invasive non-native species see the GB Non-Native Secretariat website. This criterion addresses damaging activities that may have led to or lead to deterioration in other attributes. This could include evidence of pollution, piles of manure or rubble, or inappropriate management practices (e.g., excessive hedgerow cutting).
D2: Current damage	>90% of the hedgerow or undisturbed ground is free of damage caused by human activities.	
E1: Tree class	There is more than one age-class (or morphology) of tree present (for example: young, mature, veteran and or ancient), and there is on average at least one mature, ancient or veteran tree present per 20 - 50m of hedgerow.	This criterion addresses if there are a range of age-classes or morphologies which allow for replacement of trees and provide opportunities for different species. This criterion identifies if the trees are subject to damage which compromises the survival and health of the individual specimens.
E2: Tree health	At least 95% of hedgerow trees are in a healthy condition (excluding veteran features valuable for wildlife). There is little or no evidence of an adverse impact on tree health by damage from livestock or wild animals, pests or diseases, or human activity.	
Condition categories for hedgerows without trees		
Good	No more than 2 failures in total; AND No more than 1 in any functional group.	
Moderate	No more than 4 failures in total; AND Does not fail both attributes in more than one functional group.	
Poor	Fails a total of more than 4 attributes; OR Fails both attributes in more than one functional group.	
Condition categories for hedgerows with trees		
Good	No more than 2 failures in total; AND No more than 1 failure in any functional group.	
Moderate	No more than 5 failures in total; AND Does not fail both attributes in more than one functional group.	
Poor	Fails a total of more than 5 attributes; OR Fails both attributes in more than one functional group.	



Condition Assessment Outcome	
Functional groupings	H1
A1: Height	Pass
A2: Width	Pass
B1: Gap – Hedge base	Pass
B2: Gap – Hedge canopy	Pass
C1: Undisturbed ground and perennial vegetation	Pass
C2: Nutrient-enriched perennial vegetation	Fail
D1: Invasive and neophyte species	Pass
D2: Current damage	Fail – Heavy management
E1: Tree class	N/A
E2: Tree health	N/A
Outcome	Good



Appendix C: Defra BGP Form



Biodiversity gain plan

Submit a biodiversity gain plan to show how your development will achieve biodiversity net gain.

When to use this form

A biodiversity gain plan shows how a development will achieve 10% biodiversity net gain (BNG). Submit this form to your local planning authority after they approve your planning application.

Unless your development is exempt, you cannot start the development until the LPA approves your biodiversity gain plan and biodiversity metric calculation tool.

1. Submission details

1.1 Date

For example, 3/11/2023

1.2 Planning application reference number

1.3 Local planning authority (LPA)

1.4 Development site address

If the site does not have an address, enter the OS grid reference.

1.5 Describe the development

Tell us about the proposed development and any changes of use (250 words).



Creation of a new field access

2. Developer details

2.1 Applicant name

R. Greenman (Agriculture)

2.2 Company name

2.3 Address

Gaston Farm, Gaston, Holt, Trowbridge, BA14 6QA

2.4 Email address

N/A

2.5 Telephone number

N/A

2.6 Declaration

By signing this declaration, you confirm that the information you give is complete and correct. Any opinions are your genuine opinions.

2.7 Signature

2.8 Date

3. Responsible person details

Tell us about who is responsible for completing the biodiversity gain plan. For example, a consultancy ecologist or planning agent.

3.1 Name

Greg Nightingale

3.2 Company name



Luscinia Ecology Ltd

3.3 Address

Hartham Park, Corsham, SN13 0RP

3.4 Email address

N/A

3.5 Telephone number

N/A

3.6 Declaration

By signing this declaration, you confirm that the information you give is complete and correct. Any opinions are your genuine opinions.

3.7 Signature

Yes / Confirmed / Signed

3.8 Date

26/06/25

4. Biodiversity net gain strategy

4.1 Is the relevant date for the pre-development biodiversity value the same date as the planning application?

☐ Yes

☒ No

4.2 If no, what earlier date did you agree with the LPA?

Date of the ecological survey

4.3 How have you met the guidance on 'what counts towards your BNG'?

[Find out what you can count towards a development's BNG](#)

Yes.

4.4 How will you avoid or minimise impacts to habitats?

Tell us about the steps you've taken on site, including to avoid or minimise the impact on irreplaceable habitats.



Avoided loss by selection of the Site. Minimised hedgerow loss to requirements set by sight lines for the access.

4.5 Did you use your local nature recovery strategy to inform the strategic significance of habitats?

This includes other specified strategies if you do not have a local nature recovery strategy.

☒ Yes

☐ No

4.6 How will you achieve the target net gain percentage?

☒ On-site

☐ Off-site

☐ Both

4.7 Are any of your on-site enhancements considered 'significant'?

[Find out what counts as a significant on-site enhancement.](#)

☒ Yes

☐ No

4.8 If yes, tell us about the significant on-site enhancements

Include the appropriate planning condition or how you've secured the habitat.

Tree planting and hedgerow planting

4.9 How many off-site biodiversity units do you need to meet 10% net gain?

0

4.10 Explain why you're using off-site biodiversity units

Only answer this question if you're planning to use off-site biodiversity units (250 words).

N/A

4.11 Explain why you're planning to use statutory biodiversity credits



Only answer this question if you're planning to use statutory biodiversity credits (250 words).

N/A

4.12 Do you have a habitat management and monitoring plan?

☐ Yes

☒ No

4.13 Have you used the statutory biodiversity metric tool?

☒ Yes

☐ No

4.14 Biodiversity metric calculation

Send your biodiversity metric calculation to the LPA and enter the file name.

LUS25073 BS&BGP Submission

4.15 Condition assessments

Send your condition assessments to the LPA and enter the file name.

LUS25073 BS&BGP Submission

4.16 Pre-development habitat survey report and map

Send your baseline habitat survey report and map to the LPA. Enter the file name.

LUS25073 BS&BGP Submission

4.17 Post-development habitat map or landscape plan

Send your post-development habitat survey report and map to the LPA. Enter the file name.

LUS25073 BS&BGP Submission

4.18 Have you included an approved habitat degradation in the baseline?

If yes, include the relevant consenting body and reference number.

☐ Yes

☒ No

Consenting body

N/A

Reference number



N/A

5. Irreplaceable habitats

5.1 Does the development impact any irreplaceable habitats?

If yes, tell us if you've submitted an approved compensation plan.

☐ Yes

☒ No

5.2 Have you submitted an approved compensation plan?

☐ Yes

☒ No

6. On-site habitat enhancements

Answer this section if your development includes on-site habitat enhancements.

6.1 Survey date

For example, 3/11/2023

20/05/2025

6.2 Survey constraints

For example, access issues, weather, or seasonal constraints.

None.



6.3 Total pre-development biodiversity value

Enter the number from the headline results in your statutory biodiversity metric calculation.

Number of area habitat biodiversity units

0.24

Number of hedgerow biodiversity units

0.26

Number of watercourse biodiversity units

0

6.4 Total post-development biodiversity value

Enter the number from the headline results in your statutory biodiversity metric calculation.

Number of area habitat biodiversity units

0.28

Number of hedgerow biodiversity units

0.36

Number of watercourse biodiversity units

0

6.5 Total net change in biodiversity units

Enter the number from the headline results in your statutory biodiversity metric calculation.

Area habitat biodiversity units

0.04

Area habitat biodiversity units % change

18.30%

Hedgerow biodiversity units



0.10

Hedgerow biodiversity units % change

39.53%

Watercourse biodiversity units

0

Watercourse biodiversity units % change

N/A

6.6 Will you register and allocate any biodiversity units from your site to other developments?

If yes or provisionally, give details.

☐ Yes

☒ No

6.7 Give details

Tell us about the amount of biodiversity units and the development location (250 words).

N/A

7. Off-site habitat enhancements

Answer this section if your development includes off-site habitat enhancements.

7.1 Tell us about the off-site habitat enhancements

Include whether you're delivering the off-site enhancements or buying biodiversity units.

N/A

7.2 Biodiversity gain site register reference number

N/A

7.3 How have you secured the off-site habitat enhancements?

Tell us about any responsible bodies and whether you've used an S106 or conservation covenant.



N/A

7.4 Total baseline biodiversity value

Enter the number from the headline results in your statutory biodiversity metric calculation.

Number of area habitat biodiversity units

N/A

Number of hedgerow biodiversity units

N/A

Number of watercourse biodiversity units

N/A

7.5 Total biodiversity value post-intervention

Enter the number from the headline results in your statutory biodiversity metric calculation.

Number of area habitat biodiversity units

N/A

Number of hedgerow biodiversity units

N/A

Number of watercourse biodiversity units

N/A

7.6 Total net change in biodiversity units

Enter the number from the headline results in your statutory biodiversity metric calculation.

Area habitat biodiversity units

N/A

Area habitat biodiversity units % change

N/A



Hedgerow biodiversity units

N/A

Hedgerow biodiversity units % change

N/A

Watercourse biodiversity units

N/A

Watercourse biodiversity units % change

N/A

8. Statutory biodiversity credits

Answer this section if you need to use statutory biodiversity credits.

8.1 Do you need to use statutory biodiversity credits?

☐ Yes

☒ No

8.2 How many statutory biodiversity credits do you need?

Tell us the unit shortfall by tier, including the spatial risk multiplier. Enter the number from the headline results in your statutory biodiversity metric calculation.

A1

N/A

A2

N/A

A3

N/A

A4

N/A



A5

N/A

H

N/A

W

N/A

8.3 What evidence is there that no units are available through the market?

Send a message from at least 3 habitat providers, or a search result from online registers.

N/A

8.4 Proof of purchase

Send proof of purchase and enter the reference number.

N/A

9. Trading summary

9.1 Distinctiveness group

Tell us if you met the BNG trading rules on habitat compensation for each distinctiveness group. If you did not meet the trading rules, tell us if you agreed bespoke habitat compensation.

Check the rules on habitat compensation in the [statutory biodiversity metric user guide](#).

Very high

Met

High

Met

Medium

Met

Low



Met

10. Sharing data (optional)

10.1 Can we share your ecological survey data with the Local Environmental Records Centre or other bodies?

☐ Yes

☒ No

