



**Latimer Manor
West Kington
Chippenham
SN14 7JQ**

**Biodiversity Statement and
Biodiversity Gain Plan**

Luscinia Ecology
On behalf of
Saara Sharman



Document Properties

Reference	Revision	Date	Author	Reviewer
LUS24212 BS&BGP	Draft	11/09/2025	Jenn Senft	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: 1.14 Hedgerow: 0.00 Watercourse: 0.00
Please provide the date the onsite pre-development biodiversity value was calculated.	04/09/2025
If an earlier date, to the date of the planning application, has been used, please provide details why this date has been used.	Survey date
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)'.	LUS24212 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 Latimer Manor, West Kingston, Chippenham, SN14 7JQ.
- 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 or high distinctiveness.
- 2.5 Proposed Development will achieve a Biodiversity Net Gain within the Site via the delivery of 0.12 habitat units (+10.78%) and 0.02 hedgerow units (percentage change N/A), with the Trading Rules met.
- 2.6 Therefore, the Proposed Development will meet current policy requirements in relation to Biodiversity Net Gain.
- 2.7 This assessment has been undertaken using illustrative design. The measures within this report should be secured by conditions for a HMMP.
- 2.8 The applicant is aware of, and has committed to, all the mitigation, compensation, and enhancement measures set out within this report.
- 2.9 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 17/06/2026).



Chapter 3: Introduction

Planning Context

3.1 This report sets out a Biodiversity Statement and Biodiversity Gain Plan in relation to Latimer Manor, West Kington, Chippenham, SN14 7JQ (referred to as ‘the Site’ throughout this report). This report is supported by site visits undertaken on 17/12/2024, 05/06/2025 and 04/09/2025, and an Ecological Assessment¹.

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 with a view to implement a minimum of 20% BNG⁴.

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). *Latimer Manor, West Kington, Chippenham, SN14 7JQ: Ecological Assessment: LUS24212 EA 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

- 3.1 The Site consists of existing residential buildings, outbuildings, and landscaping (referred to as ‘the Site’ throughout this report). The buildings have a curtilage of predominately hardstanding in the south-east and garden in the north-west of the Site. The Site is approximately 0.5ha in size and located at National Grid Reference: ST 80731 77122. The Site includes a hardstanding track which provides access from Drifton Hill Road to the south. The Site is immediately surrounded by existing areas of farmland and scattered areas of commercial and residential development (**Figure 1**). The wider landscape is largely formed of farmland along with a deciduous woodland located 30m to the north-east of the Site.



Figure 1. Aerial image – Site boundary in red line⁵

Proposed Development

- 3.2 This report supports a planning application for “*conversion of three outbuildings, creation of an office block and installation of ground mount solar panels, a swimming pool, pump room and tennis court*” (referred to as the ‘Proposed Development’ throughout this report). Access will be via a track, which leads to Drifton Hill Road to the south. The Proposed Development will result in the removal of the habitats within the Site and placement with solar panels and hardstanding **Figure 2** shows the Proposed Development.

⁵ Image used under licence (©2024 Google): Accessed: 21/07/2025.



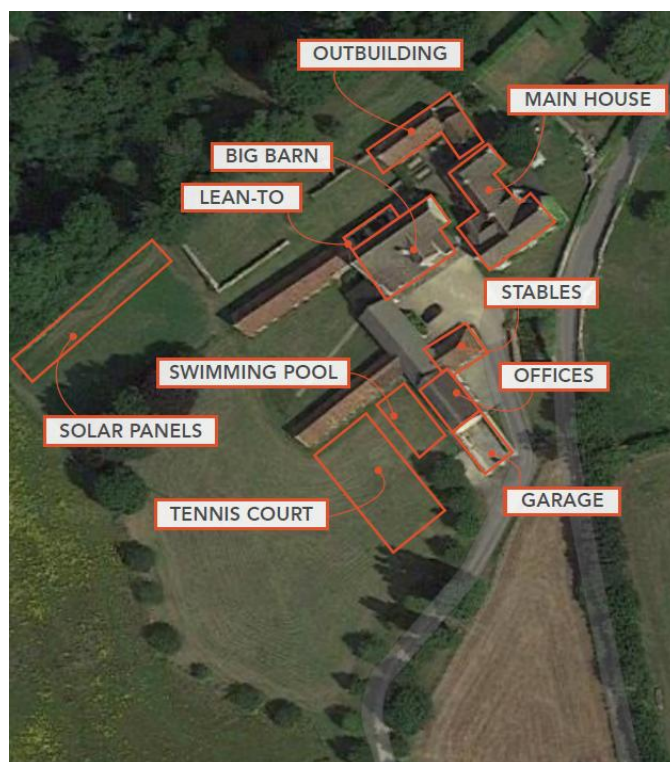


Figure 2. The Proposed Development

Purpose of this report

- 3.3 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.
- 3.4 The key objectives of this Biodiversity Statement and 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 the required 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 17/12/2024 and follow-up surveys of the grassland on 05/06/2025 and 04/09/2025. 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**).

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 Plan¹¹

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 17/03/2027). It is reasoned that there would be no material change on Site within this time period. This is reasoned in line with good practice guidelines¹².

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 applied¹³.
- The habitats were then assigned a pre-set distinctiveness grade¹⁴.
- 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 The access track has been omitted from the mapping for clarity of the areas which are impacted by the Proposed Development. No change is proposed to the access track.

¹² CIEEM (2019). Advice Note: *On the Lifespan of Ecological Reports and Surveys*. Chartered Institute for Ecology and Environmental Management, Winchester

¹³ Habitats occupying less than 25m² were absorbed and considered within the adjacent habitat(s).

¹⁴ Indicative of the inherent 'value' of the habitat.



- 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)¹⁷.
- 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:

¹⁷ 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 The solar panel array and associated works have been designed to avoid impacts to the grassland (**Figure 5**). The array will be positioned as to limit the impact upon the grassland underneath, raised off of the ground by narrow metal poles, and vegetation will be retained beneath. It is not expected that the construction process of this will have lasting impacts on the other neutral grassland. During construction, the caballing for the solar panels will be laid underneath the grassland. This will involve sensitive installation using hand tools, removing turf in at least 1m by 1m sheets and retain for later placement over the installed cables. Post construction, this area will be kept unmanaged for the benefit of the local ecology. As such, it is reasoned that the other neutral grassland will be retained.



SOLAR PANELS

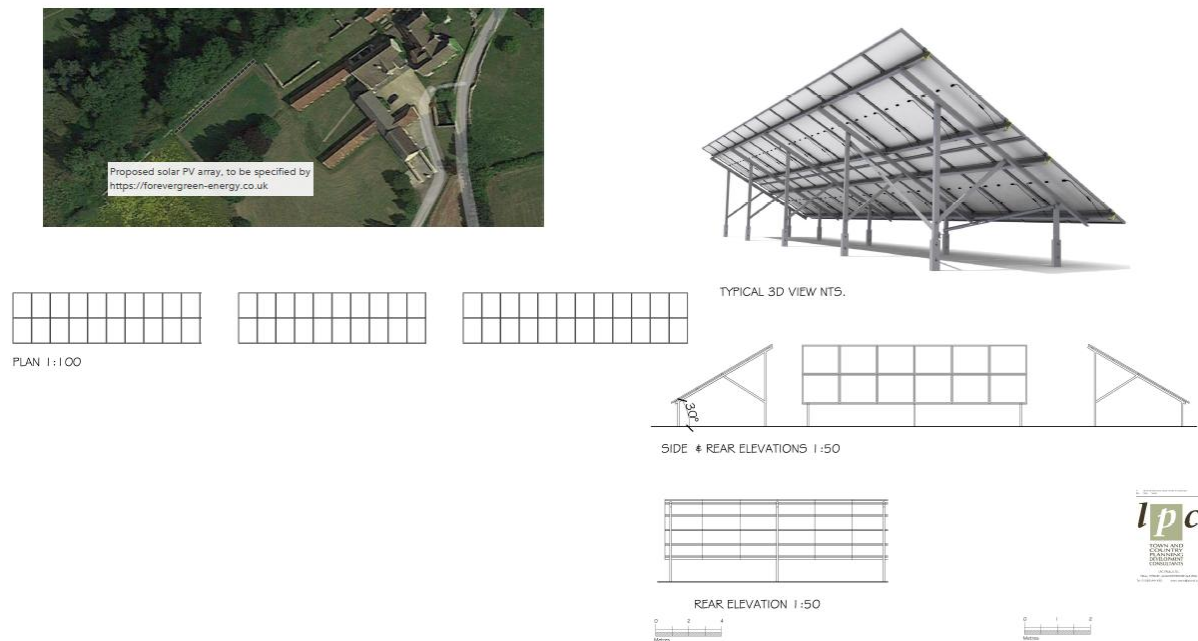


Figure 5. Proposed solar panel array

- 4.20 The Site includes areas of other neutral grassland. These have been classified as such, as opposed to private garden, as they constitute a higher quality grassland than low distinctiveness. This better represents the biodiversity value of the Site.
- 4.21 Post-development, the Site will be in active use as both a residential dwelling and as offices for commercial rental. The buildings within the east of the Site are to remain purely residential and the surrounding vegetation has been treated as such. The buildings in the south-west of the Site are to be converted into offices, with the vegetation to the west of these buildings therefore forming the curtilage of buildings for business use. For the purposes of this assessment the commercial element has been delineated as shown in **Figure 6**.





Figure 6. Commercial aspects (yellow)

Contributor Information

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



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.
Jenn Senft BSc (Hons) Qualifying member of CIEEM	Jenn is a Consultant Ecologist at Luscinia Ecology, having worked with the company for over a year. Jenn has practical experience with bat, reptile and great crested newt surveys, the UK Habitat classification system, report writing, and wildlife legislation. She has a deep understanding of current and emerging challenges facing the environment, the impacts this has on people, and how these may be mitigated to suit both the client and the planet. With this knowledge and experience, Jenn provides robust ecological advice, ensuring clients are kept in the loop at every stage of the project. Jenn is a Qualifying member of the Chartered Institute of Ecology and Environmental Management (CIEEM). She is currently working towards gaining level 2 bat licence, and level 1 great crested newt licence. She has also completed online and in person training courses with The Species Recovery Trust, BatAbility, the Field Studies Council, and CIEEM to expand her knowledge in botany, bats, badgers, otters, and tracks and signs.

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:** Other neutral grassland
- **Individual Tree:** Rural tree
- **Urban:** Artificial, unvegetated, unsealed surface
- **Urban:** Developed land; sealed surface
- **Urban:** Vegetated garden

5.3 The assessment of the character, extent, condition, historic management, and species composition of these habitats is outlined within the EA¹ and the condition assessment tables within **Appendix B**.

5.4 All the above 'Urban' habitats do not require condition assessments.

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 A small section of other neutral grassland (approximately 500m² of the extent of the habitat within the Site) will be lost to developed land in the form of an asphalt tennis court and swimming pool. Approximately 50% will be retained and enhancement (see below).



5.7 The ornamental shrubs within the vegetated garden are to be lost. The lawns are to be retained.

5.8 The individual tree, unsealed surface, and developed land are to be retained.

Habitats Enhanced

5.9 The Proposed Development will enhance the following:

- **Grassland:** Other neutral grassland

5.10 This enhancement is not considered to be on-site significant.

5.11 The other neutral grassland in the north-west of the Site (**G1**) will be the enhancement site. This is within an area of publicly accessible grassland, as supported by the commercial element of the application. It is not expected that the area will experience heavy foot-fall. The area will be enhanced from 'poor' to 'moderate' condition.

5.12 The grassland will be enhanced via direct interventions to improve the bare ground cover and species composition. This will be achieved by first removing the debris pile, followed by sowing of a suitable seed mix (e.g., WFG4 Neutral Soils seed mix). This mix will ensure that the cover of rye grasses *Lolium spp.* and white clover will be maintained at less than 30% of the total area. The area will be appropriately managed to ensure establishment in the form of appropriate irrigation (as needed), and undertaking establishment cutting once the grass is between 5cm and 10cm. Long-term management will follow with two annual cuts (early spring and early autumn). Through this management, the grassland will readily show a 'moderate' condition by achieving the following:

- Increased species diversity to at least eight species per m²
- The cover of rye grasses *Lolium spp.* and white clover is maintained at less than 30% of the total area.
- A minimum of 20% cover of broadleaved herbs and / or sedges.
- Less than 20% scrub and bracken cover.
- A bare ground cover between 1% and 5%
- No invasive non-native plant species as listed on Schedule 9 of the Wildlife and Countryside Act (1981).

Habitats Created

5.13 The Proposed Development will provide the following:

- **Urban:** Developed land; sealed surface

5.14 This creation is not considered to be on-site significant. It is of negligible importance and does not require condition assessment. It is not discussed further within this report.



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 0.12 habitat units (+10.78%) and 0.02 hedgerow units, with the Trading Rules met (**Figure 7**). As there are no hedgerow units at baseline, a percentage change cannot be calculated for this unit type. There were no watercourse units in the baseline and therefore 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>Area habitat units</i>	0.12
	<i>Hedgerow units</i>	0.02
	<i>Watercourse units</i>	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	<i>Area habitat units</i>	10.78%
	<i>Hedgerow units</i>	N/A
	<i>Watercourse units</i>	0.00%
Trading rules satisfied?	Yes ✓	

Figure 7. 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
- **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 as far as reasonably possible:
 - Utilising poor condition neutral grassland for the location of the swimming pool and tennis court.
 - Limiting the number of solar panels to the minimum required to support the residential and commercial energy usage.



- **Mitigation** – The Proposed Development will protect retained habitats and will minimised impacts on these habitats¹
- **Enhancement** – Opportunities for habitat enhancement within the Site have been explored and realistic opportunities and interventions have been agreed:
 - Enhancement of the other neutral grassland from poor to moderate condition.
- **Creation** – Opportunities for habitat creation within the Site have been explored. This is not required as the enhancement already ensures that a BNG can be delivered within the Site.
- **Offsetting** – This is not required as the above process has ensured that a BNG can be delivered within the Site.

Summary

- 6.4 The Proposed Development will meet legislation and policy requirements in relation to Biodiversity Net Gain. The biodiversity gain condition, which applies to the Proposed Development, is capable of being discharged. Sufficient information is contained within this report in relation to habitat management and monitoring to negate the need for a draft Habitat Management and Monitoring Plan (HMMP) prior to determination.
- 6.5 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 and an associated HMMP.



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 previously developed land, garden, and grassland. 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. 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> 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 loss of ecologically important habitats has been avoided. The BNG assessment process has ensured that the ecological compensation provided is ecologically equivalent in type, amount, and condition. The Trading Rules have been met. The local environment and local wildlife priorities have been considered through the Ecological Impact Assessment process. 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. New landscaping in the form of an ornamental beech hedgerow is proposed, as well as enhancement to existing other neutral grassland. These measures will increase the species diversity, habitat structure, and interconnectivity of the Site and surrounding areas. This will provide increased opportunities for wildlife, as well as maintaining the permeability of the Site to wildlife. The overall impact on habitats from the Proposed Development will be a minor 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:		Other neutral grassland	
Condition Sheet:		Grassland (medium, high and very high distinctiveness)	
Survey Date and Surveyor:		05/06/2025 – Jenn Senft	
Condition Assessment Criteria		G1	G2
A	The parcel represents a good example of its habitat type, with a consistently high proportion of characteristic indicator species present relevant to the specific habitat type. Note - this criterion is essential for achieving Moderate or Good condition for non-acid grassland types only.	Fail – species-poor and limited broad-leaved herbs	Fail – species-poor and limited broad-leaved herbs
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 insects, birds and small mammals to live and breed.	Pass	Fail – mown
C	Cover of bare ground is between 1% and 5%, including localised areas, for example, rabbit warrens.	Fail – 15% bare ground	Pass
D	Cover of bracken is less than 20% and cover of scrub (including bramble) is less than 5%.	Pass	Pass
E	Combined cover of species indicative of suboptimal condition and physical damage (such as excessive poaching, damage from machinery use or storage, damaging levels of access, or any other damaging management activities) accounts for less than 5% of total area. If any invasive non-native plant species (as listed on Schedule 9 of WCA) are present, this criterion is automatically failed.	Pass	Fail – suboptimal condition species >5%
F	There are 10 or more vascular plant species per m ² present, including forbs that are characteristic of the habitat type (species referenced in Footnote 3 and 5 cannot contribute towards this count). Note - this criterion is essential for achieving Good condition for non-acid grassland types only.	Fail – five species per m ²	Fail – five species per m ²
Condition Assessment Outcome – Non-Acid Grassland			
Passes 5 or 6 criteria, including essential criterion A and additional criterion F.		Good	
Passes 3 - 5 criteria, including essential criterion A.		Moderate	
Passes 2 or fewer criteria; OR Passes 3 or 4 criteria excluding criterion A and F.		Poor	

UKHabs Classification:		Individual trees: Rural trees	
Condition Sheet:		Individual trees Habitat Type	
Survey Date and Surveyor:		17/12/2024 – Jenn Senft	
Condition Assessment Criteria		DBH: 16cm	
		Size: Small	
A	The tree is a native species (or at least 70% within the block are native species).	Pass – common lime <i>Tilia europaea</i>	
B	The tree canopy is predominantly continuous, with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide (individual trees automatically pass this criterion).	Pass – individual tree	
C	The tree is mature (or more than 50% within the block are mature).	Pass	
D	There is little or no evidence of an adverse impact on tree health by human activities (such as vandalism, herbicide or detrimental agricultural activity) and there is no current regular pruning regime, so the trees retain >75% of expected canopy for their age range and height.	Pass	
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy, or loose bark.	Fail – no deadwood, ivy, loose bark, or other features	
F	More than 20% of the tree canopy area is oversailing vegetation beneath.	Pass – oversailing mown lawn	
Criteria Assessment Outcome			
Passes 5 or 6 criteria.		Good	Good
Passes 3 or 4 criteria.		Moderate	
Passes 2 or fewer criteria.		Poor	



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

TBC

1.2 Planning application reference number

TBC

1.3 Local planning authority (LPA)

Wiltshire Council

1.4 Development site address

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

Latimer Manor, West Kington, Chippenham, SN14 7JQ

1.5 Describe the development

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



The conversion of three outbuildings, creation of an office block and installation of ground mount solar panels, a swimming pool, pump room and tennis court.

2. Developer details

2.1 Applicant name

Saara Sharman

2.2 Company name

N/A

2.3 Address

Latimer Manor, West Kington, Chippenham, SN14 7JQ

2.4 Email address

saara.sharman@gmail.com

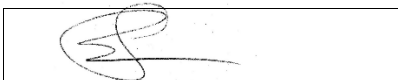
2.5 Telephone number

07739552336

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

09/10/2025

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

Jenn Senft



3.2 Company name

Luscinia Ecology

3.3 Address

Hartham Park, Corsham SN13 0RP

3.4 Email address

j.senft@luscinia-ecology.co.uk

3.5 Telephone number

07519073956

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**3.8 Date**

06/10/2025

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?

17/12/2024 – Date of
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](#)

The Proposed Development will enhance an area of other neutral grassland (**G1**) from a ‘poor’ to ‘moderate’ condition. This is reflected in the attached metric and report. The additionality principle has not been contravened.



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.

Avoidance – The Proposed Development will be located on a previously developed site

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 as far as reasonably possible:

Mitigation – The Proposed Development will protect retained habitats and will minimised impacts on these habitats¹

Enhancement – Opportunities for habitat enhancement within the Site have been explored and realistic opportunities and interventions have been agreed:

Creation – Opportunities for habitat creation within the Site have been explored. This is not required as the enhancement already ensures that a BNG can be delivered within the Site.

Offsetting – This is not required as the above process has ensured that a BNG can be delivered within the Site.

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.

N/A

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

N/A

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.

LUS242121 BS&BGP Submission (excel)

4.15 Condition assessments



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

LUS242121 BS&BGP Submission (pdf)

4.16 Pre-development habitat survey report and map

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

LUS242121 BS&BGP Submission (pdf)

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.

LUS242121 BS&BGP Submission (pdf)

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



17/12/2024

6.2 Survey constraints

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

N/A



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

1.14

Number of hedgerow biodiversity units

0.00

Number of watercourse biodiversity units

0.00

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

1.27

Number of hedgerow biodiversity units

0.02

Number of watercourse biodiversity units

0.00

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

0.12

Area habitat biodiversity units % change

10.78%

Hedgerow biodiversity units



0.02

Hedgerow biodiversity units % change

N/A

Watercourse biodiversity units

0.00

Watercourse biodiversity units % change

0.00

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

Trading Rule Met

High

Trading Rule Met

Medium

Trading Rule Met

Low



Trading Rule 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

