



Guy and Jaqueline Newman
The Gables
Ballards Ash
Royal Wootton Bassett
Swindon
SN4 8DT

30th October 2025

Dear Guy and Jaqueline Newman,

Re: Biodiversity Net Gain Assessment 2025

Please find below a summary of the Biodiversity Net Gain (BNG) baseline habitat survey and Metric Tool calculations for the site at Gables Caravan Storage, Ballards Ash, Royal Wootton Bassett, Swindon, SN4 8DT, referred to as 'the site'.

Biodiversity Statement

Where an applicant believes the development would be subject to the biodiversity gain condition, the application must be accompanied by minimum information set out in Article 7 of The Town and Country Planning (Development Management Procedure) (England) Order 2015:

- confirmation that the applicant believes that planning permission, if granted, the development would be subject to the biodiversity gain condition - **Agreed**
- the pre-development biodiversity value(s), either on the date of application or earlier proposed date (as appropriate) - **9th May 2025**
- where the applicant proposes to use an earlier date, this proposed earlier date and the reasons for proposing that date - **Date of site visit**
- the completed metric calculation tool showing the calculations of the pre-development biodiversity value of the onsite habitat on the date of application (or proposed earlier date) including the publication date of the biodiversity metric used to calculate that value – **The_Statutory_Metric_Macro_Enabled_1.0.4 – Royal Wootton Bassett, Gables Caravan Storage**
- a statement whether activities have been carried out prior to the date of application (or earlier proposed date), that result in loss of onsite biodiversity value ('degradation') - **No habitat degradation has been undertaken on site**
- a description of any irreplaceable habitat (as set out in column 1 of the Schedule to the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) on the land to which the application relates, that exists on the date of application, (or an earlier date) – **No irreplaceable habitats on-site**
- plan(s), drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application (or earlier proposed date), including any irreplaceable habitat (if applicable) – **provided within this report.**

Project Background and Scope of Assessment

Under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021), most developments in England will have to deliver at least 10% Biodiversity Net Gain (BNG) in order to be granted planning permission.

The proposals are for the redevelopment of the site for the extension of the existing caravan storage and creation of a larger access pull-in layby at Gables Caravan Storage located at Ordnance Survey Grid Reference SU 06458 84285. The redline boundary of the site is shown in Figure 1 below. The site is 0.35 ha in size and consists of existing poor quality modified grassland and existing access trackway and hardstanding.

The wider landscape consists of a mix of agricultural fields, commercial and residential properties as well as various wooded areas to the north and south. The M5 is close to the site and runs 0.11km north of the site.

The objectives of the assessment are to:

- To record all existing habitats on-site and to determine their distinctiveness and local importance.
- To assess the condition of any habitats of ecological importance using the Defra condition sheets.
- To determine the value of proposed post development habitat units and determine if the proposals achieve a net loss or gain
- To highlight any opportunities for net biodiversity gain.

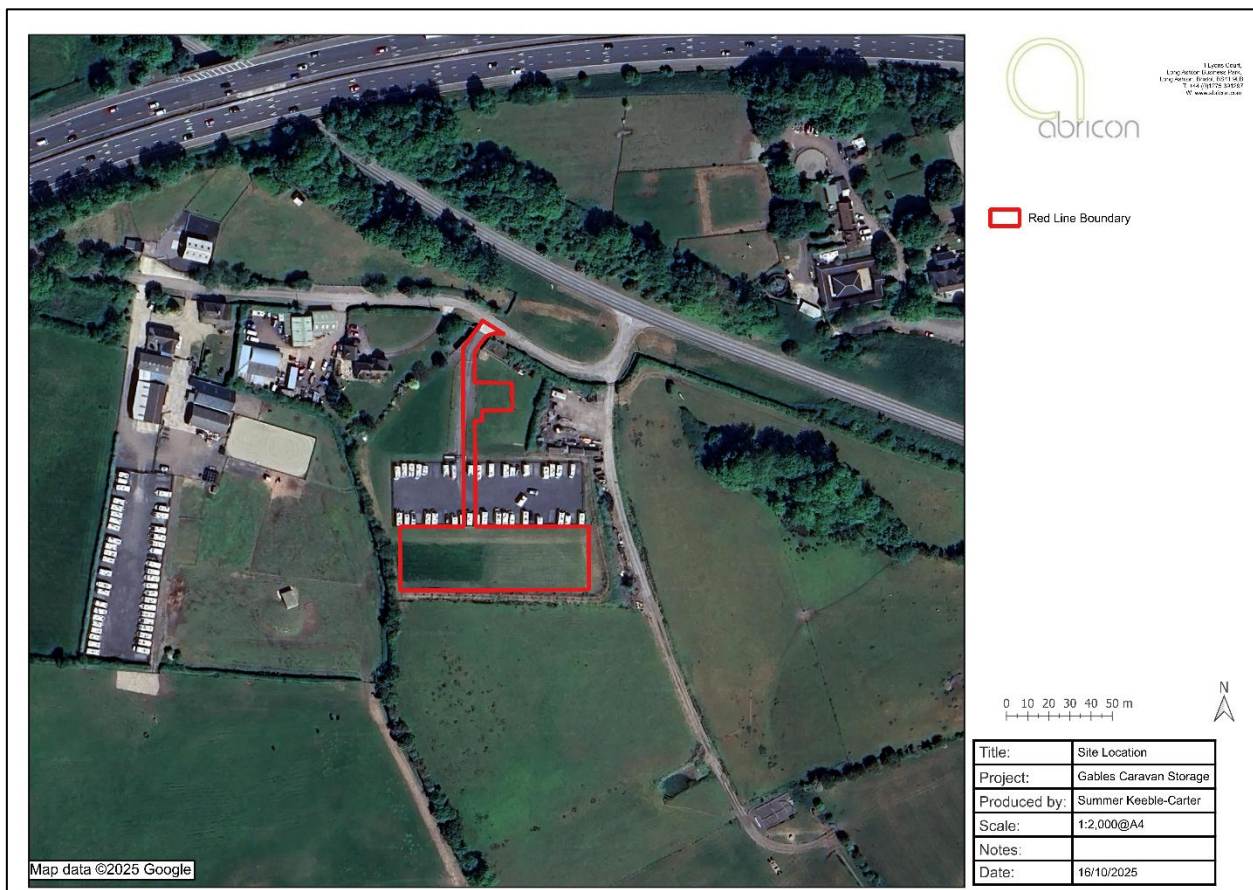


Figure 1 - Boundary of site to be developed (Basemap Google, 2025)



Methodology

Baseline Habitat Survey

A baseline habitat assessment was undertaken by suitably experienced and competent ecologists Summer Keeble Carter and Ella Colenso on 9th May 2025. Habitats were classified following UK Habitat Classification V2 (2023) guidance to be consistent with Biodiversity Net Gain requirements. Habitat areas were mapped and then measured using QGIS. The Defra metric condition assessment spreadsheet was used to inform baseline habitat condition.

The site could be fully accessed, and the assessment was undertaken at an optimal time of year for botanical survey.

Biodiversity Net Gain Assessment

A Biodiversity Net Gain assessment was completed following statutory Defra methodology and up to date industry good practice principles (CIRIA, CIEEM and IEMA) and BS 8683:2021.

The Defra Statutory Metric was used to calculate the value of BNG Habitat Units. The Biodiversity Net Gain assessment was completed using the Statutory Metric (although the Small Sites Metric is applicable in this instance due to the scale of the proposals and given to the likely requirement for off-site units/credits the standard metric was used).

The Site Location Plan, produced by A M Design in September 2025 (drawing no. 389.21.001) was used to identify post-development habitats and conditions.

Description of Habitats On-site

A plan of the habitats on-site is shown in Figure 2 below.

The site currently comprises Developed land-sealed surface (concrete site entrance (u1b6)), Artificial unvegetated-unsealed surface (access track and hardstanding yard(u1c)) and modified grassland (g4). Artificial unvegetated-unsealed surface and developed land is automatically assigned a condition of N/A within the Statutory BNG metric.

G1 modified grassland dominated by perennial ryegrass *Lolium perenne* (D) with other grass species including rough meadow grass *Poa trivialis* (A), Yorkshire fog *Holcus lanatus* (O), meadow foxtail *Alopecurus pratensis* (O) and cocksfoot *Dactylis glomerata* (R). The grassland also includes occasional/rare forbs including dock *Rumex obtusifolius* (L/A), creeping buttercup *Ranunculus repens* (F), common chickweed *Stellaria media* (R), bristly oxtongue *Helminthotheca echinoides* (R), red clover *Trifolium pratense* (R), woolly buttercup *Ranunculus lanuginosus* (R) and localised rushes in the depression to the centre of the grassland (R). Routinely managed/cut throughout the year. This grassland by definition would have fallen into the poor semi-improved grassland category when assessed under the JNCC Phase 1 habitat survey. However, BNG uses the UKHab habitat classification and under these habitat definitions, the grassland at The Gables fails to meet 3 of the 4 criteria to be 'other neutral grassland' (UKHab, 2023).

G2 modified grassland dominated by perennial rye grass (D) with limited additional species including Yorkshire fog (O) the occasional creeping buttercup (O). More heavily managed than G1.

The average sward height in G1 was between 3-10cm with some longer areas of 15-20cm, and there were 4-5 species on average per m².

The average sward height in G2 was between 3-5cm and there were 2-3 species on average per m².



The grassland onsite has undergone a condition assessment using the Statutory Condition Assessment sheet. All of the modified grassland onsite was assessed as being of poor condition. Table 1 below provides the details of the condition assessment for grassland.

Table 1 - Condition assessment for grassland on-site

Criteria		G1	G2	Notes
A	"There are 6-8 vascular plant species per m² 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 m² (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. "	N	N	Low species richness.
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.	Y	N	Some sward variance in G1. No sward height variance in G2 - all mown.
C	"Any scrub present accounts for less than 20% of the total grassland area. (Some scattered scrub such as bramble Rubus fruticosus agg. may be present). Note - patches of scrub with continuous (more than 90%) cover should be classified as the relevant scrub habitat type."	Y	Y	No scrub present.
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.	Y	Y	No physical damage.
E	Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens) ² .	N	N	<1% bare ground.
F	Cover of bracken Pteridium aquilinum is less than 20%.	Y	Y	No bracken.
G	There is an absence of invasive non-native plant species ³ (as listed on Schedule 9 of WCA4).	Y	Y	No non-native plants.
Number of criteria passed		5	4	/
Condition assessment score		Poor	Poor	/

None of the habitats are ecologically important, are located in or meet the definitions for high or medium strategic significance.

There are no hedgerows or watercourses on-site, no habitat degradation has been undertaken on-site and there are no irreplaceable habitats on-site.

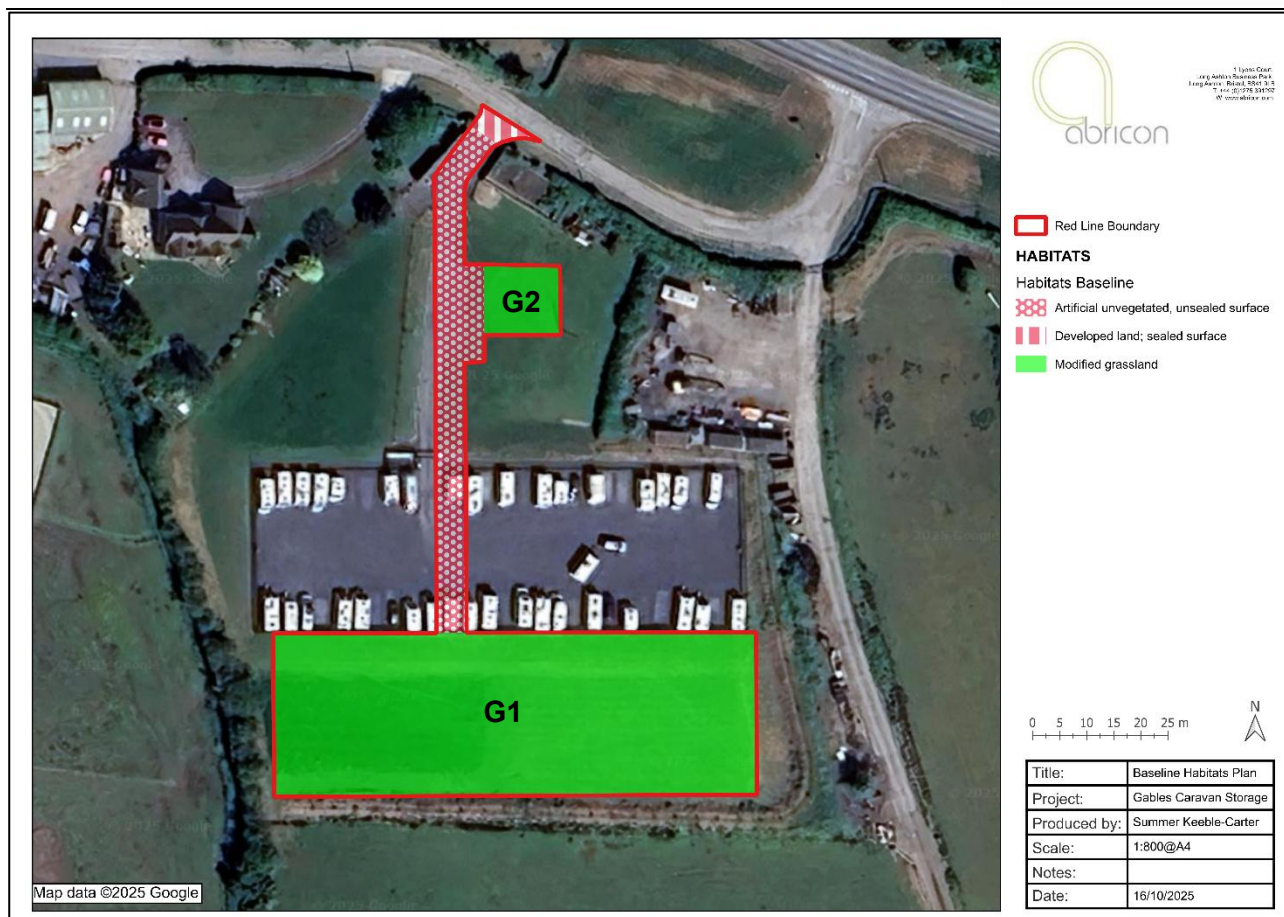


Figure 2 - Habitat Map showing current habitats present on-site

Summary of Biodiversity Net Gain Calculations

The Statutory Biodiversity Net Gain (BNG) Metric spreadsheet is appended. The assumption has been made that the proposals require only clearance of grassland within the site, and that all other habitats will be retained post-development.

The site has a baseline of 0.57 habitat units on the Statutory Metric. Based on the current proposals, a net loss of -0.57 habitat units (-100.00%). The trading rules are not satisfied for habitat units. This is based on the following habitats being created on-site which are shown on the Proposed Site Plan in Appendix A.

Habitats created will comprise:

- Artificial unvegetated-unsealed surface (N/A) – Proposed caravan storage and access track pull-in.

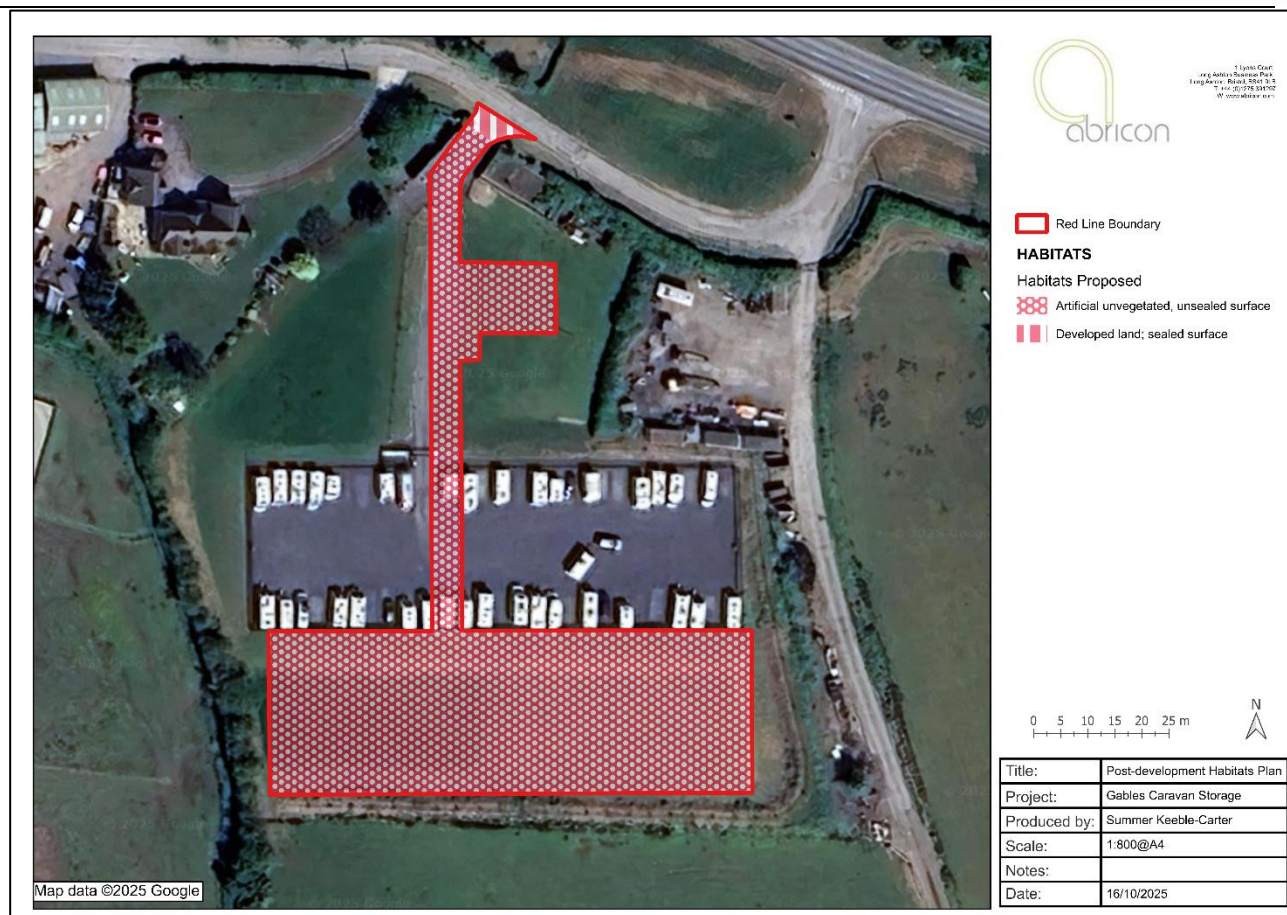


Figure 3 - Post-development Habitat Map

The trading rules are not satisfied for habitat units (mainly due to the loss of grassland units).

There appears to be no scope within the current proposals to provide habitat creation to achieve 10%+ Biodiversity Net Gain within the red-line boundary.

Table 2 - Summary of Biodiversity Net Gain

	Baseline	Proposed	Net change	Percentage	Trading Rules Satisfied	Deficit*
Habitat Units	0.57	0.00	-0.57	-100.00%	No	0.63

* Deficit = minimum units required to achieve net gain

As, under the current proposals, it will not be possible to meet the deficit required at the site, design changes and/or the purchase of off-site units from a habitat bank and/or statutory credits will be required in order for the proposed development to be compliant with the Environment Act (2021).

At the time of writing, the strategy for this project will be to secure BNG through the purchase of off-site units from a local habitat bank.



References

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- JNCC. (2010) Handbook for Phase 1 Habitat Survey – a Technique for Environmental Audit. Joint Nature Conservation Committee, Peterborough.
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- UKGOV (2021). *Environment Act 2021*. Legislation.Gov.UK. Available Online: Environment Act 2021 (legislation.gov.uk)
- UKHab Ltd (2023). *UK Habitat Classification Version 2.0* (at <https://www.ukhab.org>)

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VALIDITY

Due to the dynamic nature of ecological conditions the results of the survey(s) and related conclusions and recommendations as contained within this report should only be considered valid for up to 2 years from the date the last survey was undertaken.

Prepared by: Summer Keeble-Carter (Ecologist)
Checked by: Helen Saunders MCIEEM (Principal Ecologist)
Approved by: Jana Prapotnikova MCIEEM (Director)
Date: 30th October 2025

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Appendix A – Proposed Plans



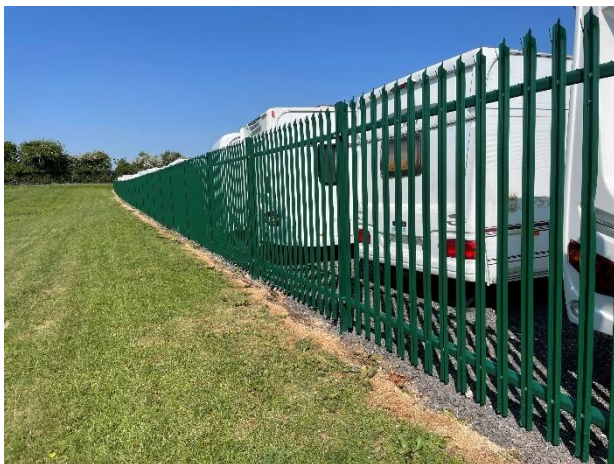
Appendix B – Site Photographs



Photograph 1: G1 grassland looking from the northeast corner of the site. Bund excluded.



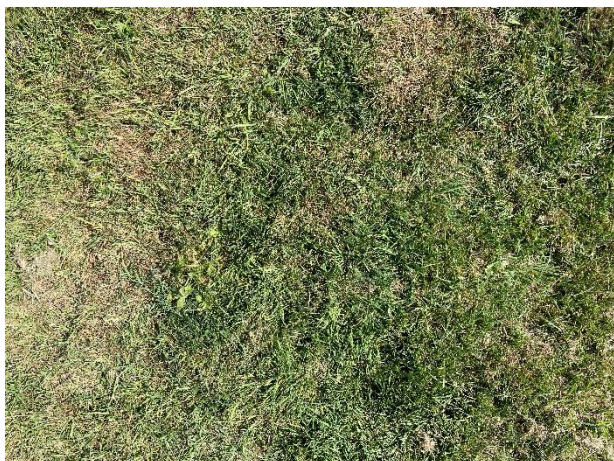
Photograph 2: G1 grassland looking from the northeast corner of the site.



Photograph 3: G1 grassland looking north towards existing storage parking.



Photograph 4: G1 grassland looking from the northwest corner of the site.



Photograph 5: Average sward composition of G1.



Photograph 6: Example of G2 grassland in northern part of site.