



Defence Infrastructure Organisation (DIO)

Bulford Services Families Accommodation Site - Bulford Camp, Sling Road

Biodiversity Net Gain Report





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Executive Summary

Consideration	Description	Reference(s) for further detail
Document purpose/scope	The purpose of this document is to report the process and outcomes of a Biodiversity Net Gain (BNG) assessment completed to inform a planning application under the Town and Country Planning Act 1990. BNG is defined as an approach to development that makes sure that habitats for wildlife are left in a measurably better state than they were before the development. In England, a minimum 10% BNG is mandatory for major developments and small sites.	Section 1.1 and Section 1.3
Applicant	Defence Infrastructure Organisation (DIO)	Section 1.1
Competent person(s) completing the Biodiversity Net Gain (BNG) assessment	This report and the Metric calculation have been completed and quality assured by a team of ecologists competent in BNG, with 7 years' collective experience of BNG assessment, including associate and full Chartered Institute of Ecology and Environmental Management membership level.	Section 2.1
Description of the development and planning permission reference number (if available)	The DIO is seeking planning permission for the construction eight houses as well as associated garages, hard landscaping, soft	Section 1.2

Consideration	Description	Reference(s) for further detail
	landscaping and SuDS (the 'Proposed Development')	
Statement that the applicant believes that the project is subject to the biodiversity gain condition*	DIO understands that, should planning permission be granted for the Proposed Development, it would be subject to the biodiversity gain condition under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) (HM Government, 2021a). The Proposed Development does not meet criteria for BNG exemption, as defined by the Biodiversity Gain Requirements (Exemptions) Regulations 2024 (HM Government, 2024b).	Section 1.1
Completed Statutory Biodiversity Metric tool provided?	Yes	Appendix D
Baseline habitat map provided?	Yes	Appendix A, Figure 1
Post-intervention habitat map provided?	Yes – in draft form	Appendix A, Figure 2
Baseline UKHab and condition assessment data provided?	Yes	Appendix D and E
Total on-site baseline area (ha)	1.13ha excluding individual trees 1.73ha including individual trees	Section 3.3
Relevant date for the pre-development (baseline) biodiversity value	No signs of habitat degradation were recorded therefore the relevant date is	Section 2.4

Consideration	Description	Reference(s) for further detail
	taken to be the date of the planning application.	
Baseline degradation	No signs of habitat degradation were recorded therefore the relevant date is taken to be the date of the planning application.	Section 2.4
Irreplaceable habitats	The arboricultural assessment (Amenity Tree Care Ltd, 2025a) (Amenity Tree Care Ltd., 2025b) has identified category A trees within the Site. Some of these trees could potentially be classified as veteran trees (Irreplaceable habitats), although there is currently insufficient information to confirm this. At present, no irreplaceable habitats are expected to be affected by the Proposed Development.	Section 3.2
Very high distinctiveness habitats	No very high distinctiveness habitats are present within the assessed Site.	Section 3
Headline result: Estimated overall net change in biodiversity value	-33.36% net loss of area habitat units	See Figure 1 below this table for headline unit results. Results are further detailed in Section 3 .
Metric trading rules met?	No - post-development habitats not yet finalised.	Trading summary per habitat provided in the Metric toolkit
Evidence of avoidance and minimisation of adverse effects on biodiversity	The proposed development is planned to avoid affecting retained habitats, especially individual trees. The current	Sections 2.5 and 3.5

Consideration	Description	Reference(s) for further detail
	location has a history of development, so less disturbed areas with potentially higher biodiversity within the wider Bulford barrack site have been avoided.	
Evidence of Biodiversity Gain Hierarchy application to compensate for adverse effects	Residential area locations have been refined. The Site includes land beyond the main development for drainage and potential biodiversity unit creation. Onsite opportunities for biodiversity unit provision will be evaluated before offsite options are considered.	Sections 2.5 and 3.
Significant on-site enhancements	At present, no notable improvements are planned for the Site; significant enhancements will be determined after the designs, including habitat creation/enhancement scenarios, have been finalised and in agreement with the LPA.	Section 3.7
Off-site enhancement and creation	The DIO will consider offsite biodiversity unit provision in the event 10% Net Gain cannot be achieved onsite. In such an event, a habitat bank will be required if suitable land for biodiversity unit delivery cannot be identified within the DIO's current ownership and management or cannot be legally secured.	Section 4

Consideration	Description	Reference(s) for further detail
Statutory biodiversity credits	N/A	N/A
Additionality What counts towards your BNG.	No Additional considerations have currently been identified	Section 2.7
Arrangements for habitat management and monitoring for 30 years.	The arrangement for any 30 year management and monitoring period are to be refined and specified in consultation with the Local Planning Authority (LPA)	Section 5
Alignment with good practice	This BNG assessment has been undertaken in alignment with the most up-to-date statutory and local guidance and good practice.	Section 2.2 and Appendix C.
Summary of key recommendations	• Conduct updated botanical surveys during the appropriate flowering season (April-September) to improve the accuracy of the BNG assessment. • Consider all possibilities for retaining, enhancing, and creating habitats on-site, in line with the Biodiversity Gain Hierarchy. • Consult with off-site habitat providers as needed, finalising arrangements before submitting the Biodiversity Gain Plan (BGP).	Section 5

Consideration	Description	Reference(s) for further detail
	• Prepare and submit the BGP post-determination to meet biodiversity gain requirements before development begins. • Ensure significant on-site gains are managed under a 30-year Habitat Management and Monitoring Plan (HMMP), formalised by legal agreement.	
Summary of any key assumptions and limitations	• The UKHab survey was undertaken outside the optimal season for botanical assessment (April to September), which limited accurate classification of grassland habitats within the Site. • Given these seasonal survey constraints, grassland habitats have been provisionally assessed as having medium distinctiveness and being in good condition, based on existing management and previous development; this will be updated with new survey results.	Sections 2.8 and 2.9

Consideration	Description	Reference(s) for further detail
	- The current assessment incorporates the drainage design, which is still being finalised; affected areas are classified as Sustainable Drainage System (SuDS) features in the post-development evaluation. - Planned habitat enhancements are intended to deliver biodiversity unit within retained undeveloped areas, with the details to be informed by future survey results; these areas are currently reflected as retained land in the biodiversity metric.	
Additional comments	N/A	N/A

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Figure 1 – Headline Metric Results for the Proposed Development

On-site baseline	Habitat units	17.56		
	Hedgerow units	0.00		
	Watercourse units	0.00		
On-site post-intervention (Including habitat retention, creation & enhancement)	Habitat units	11.70		
	Hedgerow units	0.00		
	Watercourse units	0.00		
On-site net change (units & percentage)	Habitat units	-5.86	-33.36%	On-site net gain is less than target set ▲
	Hedgerow units	0.00	0.00%	
	Watercourse units	0.00	0.00%	
Off-site baseline	Habitat units	0.00		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Off-site post-intervention (Including habitat retention, creation & enhancement)	Habitat units	0.00		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Off-site net change (units & percentage)	Habitat units	0.00	0.00%	
	Hedgerow units	0.00	0.00%	
	Watercourse units	0.00	0.00%	
Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	-5.86		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Spatial risk multiplier (SRM) deductions	Habitat units	0.00		
	Hedgerow units	0.00		
	Watercourse units	0.00		
FINAL RESULTS				
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	-5.86		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	-33.36%	Total net gain achieved is less than target set ▲	
	Hedgerow units	0.00%		
	Watercourse units	0.00%		
Trading rules satisfied?	No - Check Trading Summaries ▲			
Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Habitat units	10.00%	17.56	19.31	7.61
Hedgerow units	10.00%	0.00	0.00	0.00
Watercourse units	10.00%	0.00	0.00	0.00
				No additional hedgerow units required to meet target ✓
				No additional watercourse units required to meet target ✓

1 Introduction

1.1 Document purpose

- 1.1.1. WSP has been commissioned by Defence Infrastructure Organisation (DIO) (here after the Client) to carry out a Biodiversity Net Gain (BNG) assessment in advance of proposed development at Sling Road, Bulford near Salisbury, Wiltshire (National Grid Reference/NGR 418895, 144419, Figure 1). The proposals entail the construction of eight houses as well as associated garages, hard landscaping, soft landscaping and SuDS (the 'Proposed Development').
- 1.1.2. The Client understands that, should planning permission be granted for the Proposed Development, it would be subject to the biodiversity gain condition under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) (HM Government, 2021a). The Proposed Development does not meet criteria for BNG exemption, as defined by the Biodiversity Gain Requirements (Exemptions) Regulations 2024 (HM Government, 2024b).
- 1.1.3. The purpose of this document is to report the process and outcomes of a BNG assessment completed to inform a planning application under the Town and Country Planning Act 1990.
- 1.1.4. This report contains details relating to:
 - The BNG Statement to be submitted for planning application validation.

1.2 Project background

- 1.2.1. The boundary used for this BNG assessment is shown on **Appendix A**. The land is currently 1.13 ha of green space near Bulford Camp (central grid reference SU 18864 44408), hereafter referred to as the 'Site'.
- 1.2.2. The Site is in a semi-rural location 0.5 km north of Bulford Camp and barracks, Salisbury Plain Special Area of Conservation (SAC), Special Protection Area (SPA) and Site of Special Scientific Interest (SSSI) lies 100 m to the north and east of the Site. In the wider landscape, Salisbury lies 15 km to the south and Andover lies 17.5 km to the east of the Site.

1.3 Biodiversity Net Gain Overview

- 1.3.1. BNG is defined by the Department for Environment, Food, & Rural Affairs (Defra) as an approach to development that makes sure that habitats for wildlife are left in a measurably better state than they were before the development (Defra, 2024a).
- 1.3.2. In England, a minimum 10% BNG is mandatory for major developments and small sites under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) (HM Government, 2021a). BNG is expected to be

mandatory for Nationally Significant Infrastructure Projects (NSIPs) from May 2026 (Defra, 2026).

- 1.3.3. The BNG process follows the mitigation hierarchy, which sets out that everything possible must be done to firstly avoid, secondly minimise and thirdly restore/rehabilitate losses of biodiversity on-site. Only as a last resort, residual losses are compensated for using off-site habitat enhancement or creation (also known as biodiversity offsetting).
- 1.3.4. Mandatory BNG also requires the application of the Biodiversity Gain Hierarchy (Defra, 2024b), which specifies that:
 - *“first, in relation to on-site habitats which have a medium, high and very high distinctiveness (a score of four or more according to the statutory biodiversity metric), the avoidance of adverse effects from the development and, if they cannot be avoided, the mitigation of those effects; and*
 - *then, in relation to all on-site habitats which are adversely affected by the development, the adverse effect should be compensated by prioritising in order, where possible, the enhancement of existing on-site habitats, creation of new on-site habitats, allocation of registered off-site gains and finally the purchase of biodiversity credits.”*
- 1.3.5. Mandatory BNG must be assessed by a competent person using the Statutory Biodiversity Metric (herein referred to as “the Metric”) and its associated rules and guidance (Defra, 2024c). The Metric accounts for habitat losses and gains resulting from development and quantifies the net change in biodiversity value, measured in ‘area habitat units’, ‘hedgerow units’ and ‘watercourse units’¹. The Metric guidance also states that up-to-date industry good practice principles (CIEEM, CIRIA & IEMA, 2016) and British Standard (BS) 8683:2021 (British Standards Institute, 2021) should be applied.
- 1.3.6. BNG cannot be applied to adverse effects on irreplaceable habitats (Defra, 2024e). BNG is additional to other legislative requirements relating to habitats and species, although mitigation/enhancement from certain Developments can count towards BNG either in full or in part (Defra, 2024f).

1.4 Scope of report

- 1.4.1. WSP are proposing a minimum 10% BNG target for the Proposed Development, in line with the Environment Act 2021.
- 1.4.2. The remainder of this report and associated appendices describe the BNG assessment methods, results and recommendations for the following aspects of the Proposed Development, aligning with the Biodiversity Gain Hierarchy (Defra, 2024b):

¹ The minimum 10% BNG target applies separately for each type of unit, and these cannot be summed or traded.

- The pre-development (baseline) biodiversity unit value of on-site area habitats, hedgerows/lines of trees and watercourses, calculated using the Metric.
- The estimated biodiversity units to be retained, lost, enhanced, and created on-site, based on the Proposed Development's design.
- The resulting overall net change in on-site biodiversity unit value (i.e., whether the Proposed Development achieves an on-site net loss, no net loss, or net gain in biodiversity units).
- The overall outcome of the Proposed Development as it is presently designed

- 1.4.3. It is important to recognise that BNG is one of several factors to be considered when assessing the impact of the Proposed Development on biodiversity. Please note that this BNG report does not cover potential impacts of the Proposed Development on protected species or, designated sites, although the BNG design has been aligned with these wherever possible. These aspects are covered within the Preliminary Ecological Appraisal (PEA) (WSP, 2026).
- 1.4.4. This assessment has been compiled with reference to relevant legislation and policy relating to nature conservation and BNG, listed in **Appendix B**.

2 Methodology

2.1 Quality assurance

- 2.1.1. This report and the Metric calculation have been completed and quality assured by a team of ecologists competent in BNG, with 6 years' collective experience of BNG assessment, including associate and full Chartered Institute of Ecology and Environmental Management (CIEEM) membership level.
- 2.1.2. The habitat survey was carried out by an Associate member of CIEEM who is 'Capable' in surveys of sites containing similar habitat types (CIEEM, 2021a).

2.2 Guidance and tools

- 2.2.1. This BNG report and approach has applied the following guidance and tools:
 - UK Government Biodiversity Net Gain Collection (Defra, 2024g);
 - Statutory Biodiversity Metric and associated user guidance (Defra, 2024c), including the associated rules and principles set out in the Metric User Guide;
 - Biodiversity Net Gain: Good Practice Principles for Development (CIEEM, CIRIA & IEMA, 2016). These are listed in **Appendix C**;
 - Biodiversity Net Gain: Good Practice Principles for Development – a Practical Guide (CIEEM, CIRIA & IEMA, 2019);
 - British Standard 8683 Process for designing and implementing Biodiversity Net Gain – Specification (2021) (British Standards Institute, 2021);
 - Biodiversity Net Gain Reporting and Audit Templates (CIEEM, 2021b); and

2.3 Data sources

- 2.3.1. The following data sources have been used to complete the Metric calculation:
 - An initial desk study using publicly available and local datasets to identify potential/likely Habitats of Principal Importance (HPI), irreplaceable habitats, and statutory and non-statutory designated sites for nature conservation and the Local Nature Recovery Strategy (LNRS) Strategic Habitat areas. The desk study is described further in the PEA (WSP, 2026).
 - A UK Habitat Classification (UKHab) (UKHab, 2023) undertaken on the 24 November 2025. This survey provided baseline habitat data which detailed the habitat types present on-site, their area (ha) and/or length (km) and their geographic distribution. Full details of the survey method are provided within the PEA. All areas/lengths of habitats have been measured using ArcGIS 10.8.2 with reference to Ordnance Survey MasterMap (OSMM)). Habitat survey data has been provided within **Appendix A** and **Appendix D**.

- Condition assessments for area habitats and hedgerows were completed concurrently with the baseline habitat survey, following the Metric Condition Assessments Criteria (Defra, 2024c). A summary of condition assessment results is provided in **Appendix E**. Detailed condition assessments per individual habitat parcel are provided within the supplementary dataset (see **Appendix D**).
- Arboricultural assessments (Amenity Tree Care Ltd, 2025a) (Amenity Tree Care Ltd., 2025b) were used to inform the condition assessment and quantitative descriptions for individual trees present on the Site.
- Post-development habitats is based on drawing reference 2026UK558896-WSP-LAN-DRG-01 and visualised in (Appendix A, Figure 2) the design continues to go through iterative improvements to achieve the best feasible outcomes for biodiversity this is inclusive of habitat enhancement opportunities.

2.4 Relevant date for pre-development Biodiversity value (On-site Baseline)

- 2.4.1. The metric calculation has been carried out based on on-site baseline habitats present on the 'relevant date'². This was determined based on the date of the planning application, and whether authorised habitat degradation had been carried out since 25 August 2023 or unauthorised habitat degradation had been carried out since 30 January 2020.
- 2.4.2. No signs of habitat degradation were recorded therefore the relevant date is taken to be the date of the planning application. It is considered that the baseline survey data collected on 23 November 2025, is reflective of the habitats present on this date.

2.5 Biodiversity Gain Hierarchy

- 2.5.1. The Proposed Development has been designed in line with the Biodiversity Gain Hierarchy (Defra, 2024b) by refining the placement of the main constriction zone and locating the drainage feature to minimise impact to individual tree within the Site. The Site contains a sizable area of grassland intended to be enhanced to support on-site biodiversity units provision for the Proposed Development.

2.6 Strategic Significance

- 2.6.1. Strategic significance of habitats³ has been assessed following the categories set out in Table 7 of the Metric User Guide (Defra, 2024c) and in accordance with Wiltshire and Swindon Local Nature Recovery Strategy (LNRS) (Wiltshire Council, 2024). Post-

² As defined in paragraph 5 of Schedule 7A (Biodiversity Gain in England) of the Town and Country Planning Act 1990 (HM Government, 1990).

³ Defined as the local significance of the habitat based on its location and the habitat type – see page 27 of the Statutory Biodiversity Metric User Guide (Defra, 2024c)

development habitats have been assigned a strategic significance score based on their location and habitat type as summarised in **Table 2-1**.

Table 2-1 – Strategic Significance Assignment (taken from The Statutory Biodiversity Metric User Guidance (Defra, 2024c))

Strategic Significance	Habitats Assigned and Reasoning
High (Formally identified in local strategy)	This category can only be applied to post development interventions when: • the location of the habitat parcel has been mapped in the Local Habitat Map⁴ as an area where a potential measure has been proposed to help deliver the priorities of that LNRS; and • the proposed intervention is consistent⁵ with the mapped potential measure in the LNRS for the habitat parcel.
Medium (Location ecologically desirable but not in local strategy)	This category cannot be applied.
Low (Area not in a local strategy)	Where the definitions for high strategic significance are not met. Even if your project is in an area mapped with a potential measure, if the proposed intervention is not consistent with a potential measure proposed by the LNRS for that location, you should record strategic significance as low. Currently, no actions taken on the Site meet the LNRS intervention requirements specified for areas of the Site. All post-development habitats have been given a low value.

2.7 Additionality

No post-development interventions on the Site required assessment of additionality under government BNG guidelines (Defra, 2024f), so all biodiversity units generated on-site is eligible to count fully toward the 10% target.

2.8 Limitations

2.8.1. The following limitations are applicable for this assessment:

⁴ Where the habitat parcel has been mapped with corresponding potential measures in the LNRS

⁵ Where developments negatively impact areas that are of particular importance for biodiversity, mapped in the LNRS Local Habitat Maps (such as Local Wildlife Sites), interventions are highly unlikely to be consistent with the potential measures proposed

- 2.8.2. The UKHab survey for the Site was not carried out within the optimal season for habitat assessment, which is generally recognised as spanning from April to September. Botanical surveys are inherently subject to seasonal constraints, with various species appearing more or less prominently at different times depending on their flowering periods. As a result of conducting the survey outside this window, the information gathered was insufficient to allow for a comprehensive evaluation of the grassland types present within the Site, in accordance with current guidance. To address this limitation, it has been recommended that further survey work be undertaken during the optimal botanical survey period.

2.9 Assumptions

- 2.9.1. Due to the seasonal limitations during the survey period, there remains some uncertainty in accurately classifying the grassland habitats present on the Site. For the purposes of this assessment, it has been assumed that the grassland elements are of medium distinctiveness and in good condition. This assumption reflects both the current management practices across the Site and its history of development, which together suggest that the presence of high or very high distinctiveness grassland is unlikely. As such, this approach is deemed suitable for the current assessment and will be subject to review once further survey data becomes available.
- 2.9.2. Certain aspects of the Proposed Development's infrastructure, particularly the drainage design, are still undergoing finalisation. The current drainage layout has been incorporated into the assessment to reflect its likely impact on baseline habitats. In the post-development habitat evaluation, this area has been classified as a Sustainable Drainage System (SuDS) feature.
- 2.9.3. The proposed habitat enhancement activities will aim to generate biodiversity units within the preserved, undeveloped areas of the Site. The approach to enhancement will be determined based on the results of future habitat surveys as recommended in 2.8.2. For this assessment, these retained habitats have been incorporated without modification into the Metric. At present, no specific scenarios have been developed, as additional detailed information regarding the baseline habitat is required.

3 Results

3.1 Overview

- 3.1.1. This section provides a summary of results for the Proposed Development, including the on-site baseline and post-intervention biodiversity, as well as proposed off-site measures. Further detailed quantitative results are provided within the Metric toolkit (see **Appendix D**).

3.2 Irreplaceable habitats

- 3.2.1. Irreplaceable habitats (as defined in the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 (HM Government, 2024a)) are treated differently within the statutory framework for BNG. Good practice recommends that an overall Development-wide BNG cannot be achieved where there are losses of irreplaceable habitats, although mandatory net gain requirements will still be applied to remaining habitats (CIEEM, CIRIA & IEMA, 2019).
- 3.2.2. The arboricultural assessments (Amenity Tree Care Ltd., 2025b) has identified category A trees within the Site. Some of these trees could potentially be classified as veteran trees, although there is currently insufficient information to confirm this. At present, no irreplaceable habitats are expected to be lost as part of the Proposed Development.

3.3 On-site Baseline Biodiversity

- 3.3.1. An overview of the baseline biodiversity for the Proposed Development is provided below. The tabs within the accompanying Metric (**Appendix D**) provide quantitative details on the habitat baseline and should be referred to for full details on the habitats present on-site. In this instance, please refer to tabs: A-1 Site Habitat Baseline and B-1 Site Hedge Baseline.
- 3.3.2. A baseline habitat map is provided in **Appendix A**. A summary of baseline biodiversity unit (area habitat units) is provided in **Figure 3-1**.

3.4 On-site Baseline

- 3.4.1. The Site comprises predominantly grassland interspersed with a range of semi-mature to mature trees of various species, as well as areas of hard standing track (see Figure 1, Appendix A). The grassland forms the majority of the Site and, for the purposes of this current assessment, is considered to be a medium distinctiveness grassland in good condition. This classification is provisional and will be refined following further botanical survey work, which will provide the necessary evidence to support any adjustments to the classification and valuation.
- 3.4.2. In addition to the grassland, scattered trees are present throughout the Site. These trees have been subject to a dedicated arboricultural assessment (Amenity Tree Care Ltd, 2025a) (Amenity Tree Care Ltd., 2025b), which delivers a quantitative account of the trees present as well as an evaluation of their arboricultural value. Comprehensive details regarding the

habitats present and their respective conditions are contained within the PEA (WSP, 2026), the arboricultural assessment, and **Appendices D** and **E**.

3.5 On-site post-intervention Biodiversity

- 3.5.1. An overview of on-site post-intervention biodiversity for the Proposed Development is provided below, in line with the Biodiversity Gain Hierarchy (Defra, 2024h). The tabs within the accompanying Metric (see **Appendix D**) provide full quantitative details of on-site habitat retention, enhancement, loss and creation. In this instance, please refer to tabs: A-1, A-2 and B-1. A post-intervention habitat map is provided in **Appendix D**.

3.6 On-site Habitat Retention

- 3.6.1. In accordance with both the mitigation hierarchy and the Biodiversity Gain Hierarchy, habitats have been retained wherever possible within the Proposed Development. Particular emphasis has been placed on the retention and protection of scattered trees.
- 3.6.2. Furthermore, areas located to the west of the Site have been identified for retention. As the post-development design evolves, it is anticipated that these retained areas will be enhanced to provide additional biodiversity units in support of the Proposed Development. The precise nature of these enhancement measures will be determined following updated botanical survey work, which will guide the specific interventions required to maximise biodiversity gains within these retained habitats with the intention to align with the Local Nature Recovery Strategy habitat priorities (Wiltshire Council, 2024).

On-site habitat loss and creation

- 3.6.3. The proposed residential development will primarily result in the loss of grassland habitat. These impacts are concentrated on the eastern portion of the Site, with additional grassland to be removed in the west to facilitate the installation of a drainage feature.
- 3.6.4. The Proposed Development will incorporate the establishment of private gardens, alongside a limited area of communal green space. These newly created habitats have been assessed as being of low distinctiveness.
- 3.6.5. Additionally, the current post-development design includes the provision of a drainage feature, which will function as a SuDS element within the Site.

3.7 Significant On-Site Habitat Enhancement

- 3.7.1. Habitat enhancement and creation measures that qualify as 'significant on-site enhancements' (Defra, 2024i) need to be legally secured (via planning condition, s106 agreement, or conservation covenant) and subject to a 30-year Habitat Management and Monitoring Plan (HMMP). These will need to be confirmed with the LPA prior to commencement as part of the final BGP.
- 3.7.2. Currently, no specific habitat enhancement operations classified as 'significant' have been proposed for the site. It is anticipated, however, that the delivery of biodiversity units through

the enhancement of retained habitats would constitute ‘significant on-site enhancement’. As such, these interventions will be subject to the necessary considerations outlined previously, including legal mechanisms and long-term management obligations.

- 3.7.3. The precise details of these enhancement scenarios will be guided by future botanical survey work.

Summary of on-site Biodiversity change

- 3.7.4. Figure 3-1 presents the headline results for the on-site biodiversity units, the post-intervention biodiversity unit, and the resulting on-site net change. For a comprehensive breakdown of results for each individual habitat type, including the details of habitat trading, reference should be made to the Metric toolkit provided in Appendix D.

On-Site Unit Shortfall

- 3.7.5. A short fall of 7.61 biodiversity units has currently been calculated for the Site, however these values will be refined when the final design for the Proposed Development is completed. There is potential for enhancement scenarios within the retained habitat areas to contribute biodiversity units onsite. However, the magnitude of this potential delivery will depend on confirmation of the baseline habitats and the selection of enhancement scenarios. Any residual onsite biodiversity unit shortfall, following consideration of onsite delivery, is proposed to be compensated by implementing off-site measures in accordance with the Metric’s trading rules. Details of these off-site measures are discussed in Section 4.

Meeting Biodiversity Net Gain Requirements

- 3.7.6. Current assessments reveal a shortfall of 7.61 biodiversity units (area habitat units) necessary to meet the 10% minimum BNG requirement for the Proposed Development. In response to this deficit, further habitat enhancement scenarios will be considered for the retained on-site areas. These interventions aim to maximise biodiversity unit delivery within the Site, subject to confirmation of baseline habitats and the selection of appropriate enhancement measures.
- 3.7.7. In the event where, on-site enhancements are not sufficient to meet statutory BNG requirements, off-site biodiversity units will be considered as a last resort to meet the 10% minimum BNG requirement for the Proposed Development. These off-site units will likely be obtained through a purchase of units from a recognised habitat bank. This combined approach will ensure that the Proposed Development achieves at least a 10% net gain in biodiversity, meeting statutory and planning obligations.

Figure 3-1 - On-site Headline Results

On-site baseline	Habitat units	17.56		
	Hedgerow units	0.00		
	Watercourse units	0.00		
On-site post-intervention (Including habitat retention, creation & enhancement)	Habitat units	11.70		
	Hedgerow units	0.00		
	Watercourse units	0.00		
On-site net change (units & percentage)	Habitat units	-5.86	-33.36%	On-site net gain is less than target set ▲
	Hedgerow units	0.00	0.00%	
	Watercourse units	0.00	0.00%	
Off-site baseline	Habitat units	0.00		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Off-site post-intervention (Including habitat retention, creation & enhancement)	Habitat units	0.00		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Off-site net change (units & percentage)	Habitat units	0.00	0.00%	
	Hedgerow units	0.00	0.00%	
	Watercourse units	0.00	0.00%	
Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	-5.86		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Spatial risk multiplier (SRM) deductions	Habitat units	0.00		
	Hedgerow units	0.00		
	Watercourse units	0.00		
FINAL RESULTS				
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	-5.86		
	Hedgerow units	0.00		
	Watercourse units	0.00		
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	-33.36%	Total net gain achieved is less than target set ▲	
	Hedgerow units	0.00%		
	Watercourse units	0.00%		
Trading rules satisfied?	No - Check Trading Summaries ▲			
Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Habitat units	10.00%	17.56	19.31	7.61
Hedgerow units	10.00%	0.00	0.00	0.00
Watercourse units	10.00%	0.00	0.00	0.00
				No additional hedgerow units required to meet target ✓
				No additional watercourse units required to meet target ✓

Trading Rules

- 3.7.8. Based on the on-site design, the Metric trading rules have not been met for all habitats.
- 3.7.9. Habitat types for which trading rules have not been met on-site include:
- grassland;
- 3.7.10. Further improvements in landscaping and possible habitat enhancement scenarios, along with required off-site measures, will seek to address this issue.

4 Off-site Biodiversity

4.1 Overview

- 4.1.1. In the event that on-site measures are insufficient to meet statutory BNG requirements, off-site biodiversity units will be required. In such circumstances, appropriate off-site options should be identified and assessed to ensure full compliance with BNG statutory and planning obligations. This section provides an indicative summary of the number and type of off-site biodiversity units that may be necessary to achieve the 10% net gain target, based on the assumptions set out in Section 2.9.
- 4.1.2. In the first instance, the Client should seek to create the required habitats off-site to satisfy the trading rules for the Proposed Development's metric. Where possible, these habitats should be established within land currently owned or managed by the Client and ideally located in proximity to the Site. Preference should be given to areas within the Local Planning Authority (LPA) boundary (Wiltshire Council) or the relevant National Character Area (NCA) (132 - Salisbury Plain and West Wiltshire Downs). Furthermore, areas identified within the Local Nature Recovery Strategy (LNRS) should be prioritised wherever feasible. These Client owned off-site biodiversity units will be legally secured for a 30-year period through the planning process and registered with Natural England to ensure accurate allocation of any off-site biodiversity units.

4.2 Offsite Units availability

- 4.2.1. In situations where no appropriate off-site areas can be identified or secured by the Client, it will be necessary to acquire biodiversity units from a habitat bank. A review of the current the marketplace^{6,7} on the 30 January 2026 has identified that grassland units are presently available for purchase. The Chippenham Habitat Bank, managed by Environment Bank, currently offers the necessary unit types within the Wiltshire Council LPA area. These units provide an alternative way to meet biodiversity net gain requirements when it is not possible to create habitats directly off-site.
- 4.2.2. All biodiversity units obtained from a habitat bank will be legally secured and subject to a Habitat Management and Monitoring Plan (HMMP) for a minimum period of 30 years. The responsibility for ensuring that the relevant legal agreements are in place, and for implementing any necessary management requirements, will rest with the biodiversity unit provider. Upon purchase, the Client will be provided with comprehensive documentation confirming their ownership of the specific biodiversity units. This documentation will serve as formal evidence of compliance with the BNG requirements and will be included in the final submission to the planning authority.

⁶ Gaia: <https://marketplace.gaiacompany.io/hub/marketplace>. Accessed 15 January 2026.

⁷ Environmental Trading Platform: <https://environmentaltradingplatform.com/biodiversity-credits>. Accessed: 15 January 2026.

5 Recommendations and Next Steps

- 5.1.1. The following recommendations apply to the Proposed Development in order to meet national and local policy and legislative requirements, as well as BNG good practice:
- Conduct updated botanical surveys during the appropriate flowering season (April-September) to improve the accuracy of the BNG assessment.
 - Consider all possibilities for retaining, enhancing, and creating habitats on-site, in line with the Biodiversity Gain Hierarchy.
 - Consult with off-site habitat providers as needed, finalising arrangements before submitting the Biodiversity Gain Plan (BGP).
 - Prepare and submit the BGP post-determination to meet biodiversity gain requirements before development begins.
 - Ensure significant on-site gains are managed under a 30-year Habitat Management and Monitoring Plan (HMMP), formalised by legal agreement.

6 References

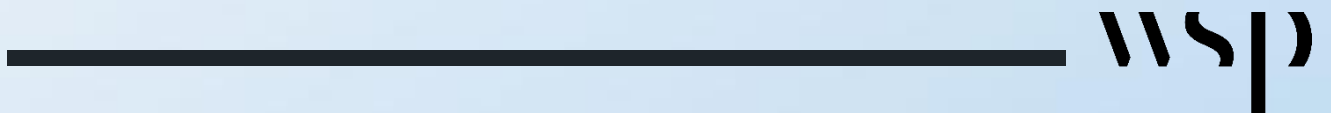
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Appendix A

Baseline and Post-intervention Habitat Maps





Key

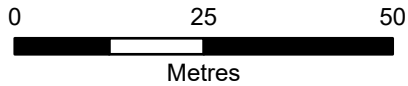
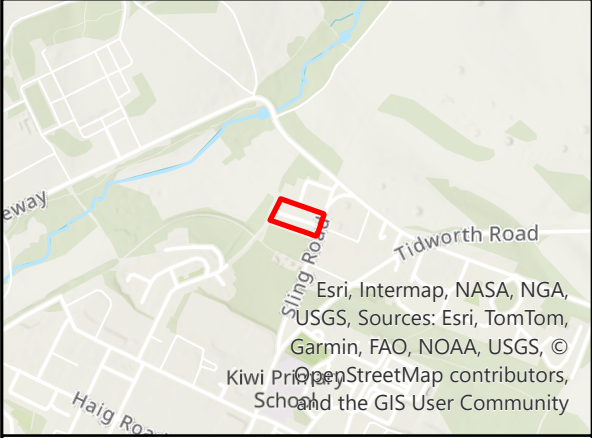
 Site boundary

Baseline habitats

 g3c - other neutral grassland

 u1b6 - other developed land

 Trees



Client:
Defence Infrastructure Organisation

Project:
Bulford Services Families Accommodation Site – Bulford Camp, Sling Road

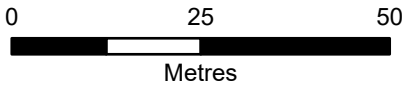
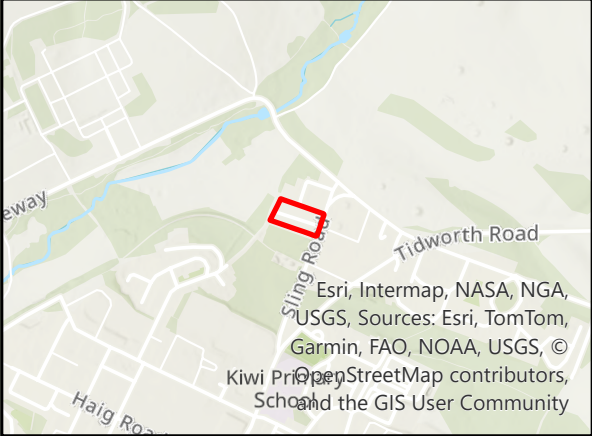
Title
BNG - Baseline habitats

Drawing No:	Figure 1	Drawn:	DB
Date:	February 2026	Checked:	JR
Scale:	1,000 @ A3	Approved:	CH



Key

-  Site boundary
- Post-development habitats**
-  g3c - Other neutral grassland
-  g4 - Modified grassland
-  g 848 - Sustainable drainage systems
-  u1b - Developed land; sealed surface
-  u1b5 - Buildings
-  u 828 - Vegetated garden
-  Retained habitat
-  Retained trees



Client:
Defence Infrastructure Organisation

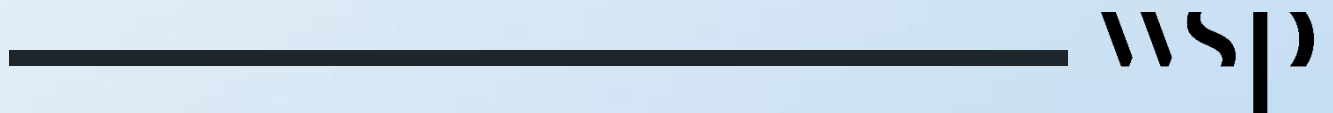
Project:
Bulford Services Families Accommodation Site – Bulford Camp, Sling Road

Title
BNG - Post-development habitats

Drawing No:	Figure 2	Drawn:	DB
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Scale:	1,000 @ A3	Approved:	CH

Appendix B

BNG Legislation & Policy



Appendix B – BNG Legislation and Policy

National legislation

England

Environment Act 2021

BNG is mandatory under Schedule 7a of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) (HM Government, 2021a). This means that most major developments (with exemptions) must deliver a minimum of 10% net gain for biodiversity as a condition of planning permission, measured by the Statutory Biodiversity Metric. There are six statutory instruments that work together to deliver the BNG framework including:

- The Biodiversity Gain (Town and Country Planning) (Consequential Amendments) Regulations 2023 (HM Government, 2024e);
- The Biodiversity Gain Sites Register (Financial Penalties and Fees) Regulations 2023 (HM Government, 2023a);
- The Biodiversity Gain Site Register Regulations 2024 (HM Government, 2024f) ;
- The Biodiversity Gain Requirements (Exemptions) Regulations 2024 (HM Government, 2024b);
- The Biodiversity Gain Requirements (Irreplaceable Habitats) Regulations 2024 (HM Government, 2024a); and
- The Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024 (HM Government, 2024d).

Under mandatory BNG, the Biodiversity Gain Hierarchy must be considered by LPAs when determining whether to approve a Biodiversity Gain Plan. Here, efforts must be made to first avoid then minimise adverse impacts in relation to on-site medium, high and very high distinctiveness habitats. Secondly, any adverse effect should be compensated by prioritising in order, where possible, the enhancement of existing on-site habitats, creation of new on-site habitats, allocation of registered off-site gains and finally the purchase of biodiversity credits. All significant on-site gains and all off-site gains from a development must be legally secured, managed and maintained for a period of 30 years.

Mandatory BNG does not replace existing legislations and protections for sites, habitats and species.

The Environment Act 2021 also amended the Natural Environment and Rural Communities (NERC) Act 2006 (HM Government, 2006). This amendment extended the duty of public authorities (the 'Biodiversity Duty') beyond the original NERC Act, which referred only to

conservation, so that it included the enhancement of biodiversity in England. Further description of the NERC Act is provided below.

All government policy and guidance are collated under the Biodiversity Net Gain Collection (Defra, 2024g).

UK Government's Environmental Improvement Plan

Biodiversity Net Gain is a key cross-cutting theme to deliver the environmental targets and commitments set out in the Government's Environmental Improvement Plan (Defra, 2023a).

National Planning Policy Framework

The revised National Planning Policy Framework (NPPF) (HM Government, 2024g) refers to conserving and enhancing the natural environment. This requires Local Authorities in England to take measures to:

- Conserve and enhance biodiversity;
- Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks within plans;
- Promote the conservation, restoration and enhancement of priority habitats, ecological networks and priority species within plans, in addition to secure measurable net gains for biodiversity; and
- Refuse planning permission for development, if significant harm resulting from a development cannot be avoided, adequately mitigated, or, as a last resort, compensated for.

The revised NPPF refers to biodiversity and environmental net gains in the following paragraphs:

- Transport Infrastructure:
 - Paragraph 109. *"Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*

*d) the environmental impacts of traffic and transport infrastructure can be identified assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for **net environmental gains**."*
- Planning decisions
 - Paragraph 125. *"Planning policies and decisions should a) encourage multiple benefits from both urban and rural land ... and taking opportunities to **achieve net environmental gains - such as developments that would enable new habitat creation or improve public access to the countryside**."*

- Paragraph 187. *“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.”*
- Paragraph 192. *“To protect and enhance biodiversity and geodiversity plans should b) 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**.”*
- Paragraph 193. *“When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts) adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused; ... and d) ... “ development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can **secure measurable net gains for biodiversity** or enhance public access to nature where this is appropriate”.*

Natural Environment and Rural Communities Act 2006

The Natural Environment and Rural Communities (NERC) Act (HM Government, 2006) requires public bodies, including local authorities, ‘*to have regard to the conservation of biodiversity in England when carrying out their normal functions*’.

Section 40 sets out the ‘Duty to Conserve and Enhance Biodiversity’, and states that:

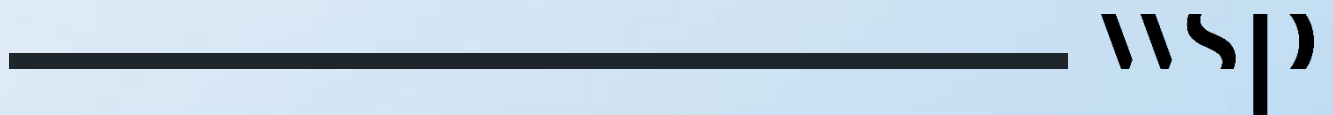
- Paragraph 1. *“A public authority which has any functions exercisable in relation to England must from time to time consider what action the authority can properly take, consistently with the proper exercise of its functions, to further the general biodiversity objective”.* The general biodiversity objective is the “*conservation and enhancement of biodiversity in England*”.

Section 41 sets out that:

- Paragraph 1. *“The Secretary of State must... publish a list of the living organisms and types of habitat ... of principal importance for the purpose of conserving biodiversity”* based on consultation with Natural England; and that
- Paragraph 3a. The Secretary of State must *“a) take such steps... to further the conservation of the living organisms and types of habitat included in any list published under this section, or (b) promote the taking by others of such steps”.*

Appendix C

**BNG Good Practice Principles
(CIEEM, IEMA & CIRIA, 2016)**



Appendix C – BNG Good Practice Principles (CIEEM, IEMA & CIRIA, 2016)

Principle	Description
1. Apply the mitigation hierarchy	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.
2. Avoid losing biodiversity that cannot be offset by gains elsewhere	Avoid impacts on irreplaceable biodiversity – these impacts cannot be offset to achieve No Net Loss or Net Gain.
3. Be inclusive and equitable	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.
4. Address risks	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.
5. Make a measurable Net Gain contribution	Achieve a measurable, overall gain for biodiversity and the services ecosystems provide while directly contributing towards nature conservation priorities.
6. Achieve the best outcomes for biodiversity	Achieve the best outcomes for biodiversity by using robust, credible evidence and local knowledge to make clearly justified choices when: ▪ Delivering compensation that is ecologically equivalent in type, amount and condition, and that accounts for the location and timing of biodiversity losses;

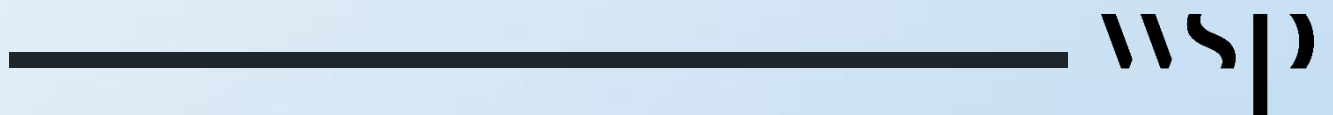
Principle	Description
	■ Compensating for losses of one type of biodiversity by providing a different type that delivers greater benefits for nature conservation; ■ Achieving Net Gain locally to the development while also contributing towards nature conservation priorities at local, regional and national levels; ■ Enhancing existing or creating new habitat; ■ Enhancing ecological connectivity by creating more bigger, better, and joined areas for biodiversity.
7. Be additional	Achieve nature conservation outcomes that demonstrably exceed existing obligations (i.e., do not deliver something that would occur anyway).
8. Create a Net Gain legacy	Ensure Net Gain generates long-term benefits by: ■ Engaging stakeholders and jointly agreeing practical solutions that secure Net Gain in perpetuity; ■ Planning for adaptive management and securing dedicated funding for long-term management; ■ Designing Net Gain for biodiversity to be resilient to external factors, especially climate change; ■ Mitigating risks from other land uses; ■ Avoiding displacing harmful activities from one location to another; ■ Supporting local-level management of Net Gain activities.
9. Optimise sustainability	Prioritise Biodiversity Net Gain and, where possible, optimise the wider environmental benefits for a sustainable society and economy.



Principle	Description
10. Be transparent	Communicate all Net Gain activities in a transparent and timely manner, sharing the learning with all stakeholders.

Appendix D

Statutory Biodiversity Metric & Supplementary Files



Appendix D – Statutory Biodiversity Metric & Supplementary Files

A completed Statutory Biodiversity Metric Excel toolkit has been provided alongside this report, please see the following file:

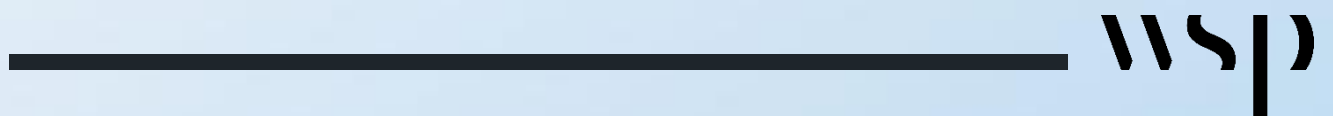
- Appendix D - The_SBM_Bulford_300126

In addition, the following supplementary data has been provided:

- Appendix D - Bulford_Statutory_Biodiversity_Metric_Condition_Assessments

Appendix E

Habitat & Hedgerow Condition Assessment Summary



Appendix E – Condition Assessment Summary

Table E-1 provides a summary of baseline condition assessment results for area habitats and hedgerows. Full, detailed condition assessment results can be found in **Appendix D**.

Table E-1 – Condition Assessment Summary for Area Habitats and Hedgerows

Habitat reference or location	Condition sheets	Total number of condition sheets used, or habitat parcels	Number of parcels of each condition achieved					Notes
			Good	Fairly Good	Moderate	Fairly Poor	Poor	
Other neutral grassland	Grassland medium, high, very high distinctiveness	2	2					Further surveys needed to consolidate
Scattered Trees	Individual Trees	23	1		21		1	



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