



Preliminary Ecological Appraisal and Biodiversity Net Gain Assessment
Land to the Rear of Unit 1, Barley Close Farm, Bromham, SN15 2JA

For and on behalf of Howard and Sons Limited

January 2026

DOCUMENT CONTROL SHEET

Project Name: Land to the Rear of Unit 1, Barley Close Farm, Bromham, SN15 2JA
Preliminary Ecological Appraisal and Biodiveristy Net Gain Assessment

Client: Howard and Sons Limited

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The evidence which Herdwick Ecology has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's Code of Professional Conduct. We confirm that the opinions expressed are our true and professional opinions.

1.0 Introduction

- 1.1 Herdwick Ecology Ltd has been commissioned by Howard and Sons Limited to undertake an Ecological Appraisal and Biodiversity Net Gain assessment Land to the Rear to Unit 1, Barley Close Farm, Bromham, SN15 2JA (Central Reference ST) to inform proposals for the consolidation of an outside storage area.
- 1.2 This report has been prepared by Ceri Griffiths, Director at Herdwick Ecology, who is a Full Member of the Chartered Institute of Ecology and Environmental Management (CIEEM). Reference is made to CIEEM Guidelines for Preliminary Ecological Appraisal¹ and BS 42020:2013 Biodiversity - Code of practice for planning and development². The Statutory Biodiversity Metric has been used, with habitat data collated during the survey to assess the baseline units.

2.0 Aims and objectives

- 2.1 This report support a full planning application to Wiltshire Council and aims to:
- Review the relevant biological records and assess their significance;
 - Identify any protected species issues or potential issues that may exist;
 - Assess possible ecological constraints to development and make recommendations to avoid, minimise and mitigate for any potential impacts during the development; and
 - Set out opportunities for net gain and ecological enhancements in line with relevant planning policy, legislation and other published guidance to inform a detailed application.
- 2.2 With regards to the Biodiversity Net Gain assessment, this report will also:
- Present the baseline habitat value of the development site;
 - Present the habitat value of the proposed landscaping incorporated into the post-development design; and
 - Present the overall net habitat value change in both habitat units and a percent change.

3.0 Legislation and Planning Policies

- 3.1 In carrying out this assessment relevant legislation, planning policies, and best practice guidelines were consulted and include:
- Conservation of Habitats and Species Regulations 2017 (as amended);
 - Wildlife and Countryside Act 1981 (as amended);
 - Countryside and Rights of Way (CROW) Act 2000;
 - Natural Environment and Rural Communities (NERC) Act 2006;

¹ CIEEM (2017) *Guidelines for Preliminary Ecological Appraisal* (2nd. Ed.) CIEEM

² BSI (British Standards Institute) BS4202:2013 *Biodiversity – A code of practice for planning and development*. BSI, London.

- National Planning Policy Framework 2024 (NPPF);
- Local Planning Policies and supplementary planning documents/technical guidance.

National Planning Policy Framework (NPPF) 2024

- 3.2 National planning policy on biodiversity and conservation is set out in the National Planning Policy Framework (NPPF). This emphasises that the planning system should seek to minimise impacts on biodiversity and provide net gains in biodiversity wherever possible as part of the Government's commitment to halting declines in biodiversity and establishing coherent and resilient ecological networks. Chapter 15: Conserving and Enhancing the Natural Environment, is of particular relevance to this report as it relates to ecology and biodiversity. Relevant policies are set out below:
- 3.3 Paragraph 185: *"To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and 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..."*
- 3.4 Paragraph 186 states: "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'*
 - b) Relates to developments affecting SSSI
 - c) Relates to developments affecting irreplaceable habitats, such as ancient woodland
 - d) *'Development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity'.*
- 3.5 The Government Circular 06/2005, which is referred to by the NPPF, provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system.
- 3.6 The above approach encapsulates the 'mitigation hierarchy' described in British Standard BS 42020:2013, which involves the following step-wise process:
- Avoidance – avoiding adverse effects through good design;

- Mitigation – where it is unavoidable, mitigation measures should be employed to minimise adverse effects;
- Compensation – where residual effects remain after mitigation it may be necessary to provide compensation to offset any harm; and
- Enhancement – planning decisions often present the opportunity to deliver benefits for biodiversity, which can also be explored alongside the above measures to resolve potential adverse effects.

- 3.7 The measures for avoidance, mitigation, compensation, and enhancement should be '*proportionate to the predicted degree of risk to biodiversity and to the nature and scale of the proposed development*'

Conservation of Habitats and Species Regulations 2017 (as amended)

- 3.8 In summary these regulations, also referred to as the Habitat Regulations, cover the designation and protection of European sites and the protection of European protected species (EPS).

Environment Bill and Biodiversity Net Gain

- 3.9 The Environment Bill received Royal Assent on 9th November 2021, becoming the Environment Act; this includes the provision of biodiversity gain for developments in England, which will be mandated through an amendment to the Town and Country Planning Act 1990. The two-year transition period that follows Royal Assent means that mandatory Biodiversity Net Gain (BNG) became law on 12th February 2024, with small sites being mandatory on the 2nd April 2024 under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021)

Local Plan

- 3.10 The Wiltshire Core Strategy Development Plan Document ('the plan') was formally adopted on 20 January 2015. The plan provides a positive and flexible overarching planning policy framework for Wiltshire for the period up to 2026. Policy 50 'Biodiversity and Geodiversity' states that: '*Development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term.... All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development.* The policy goes on to state that all developments should seek opportunities to enhance biodiversity.

Species Protection

- 3.11 A number of species, including all bats and great crested newts, are afforded protection under The Wildlife and Countryside Act 1981 (as amended)

- 3.12 Under this legislation, a person is guilty of an offence if a person intentionally or recklessly:

- disturbs any animal while it is occupying a structure or place which it uses for shelter or protection;
- obstructs access to any structure or place which any animal uses for shelter or protection.

3.13 In addition the protection afforded through UK legislation, further protection is provided to a small group of species, commonly referred to as 'European Protected Species' under the Conservation of Habitats and Species 2017 (as amended) (also known as the Habitats Regulations), including bats and great crested newts.

3.14 With regards to European Protected Species listed under Schedule 2 of the Act, it is an offence to:

- Intentionally or deliberately capture or kill, or intentionally injure the animal;
- Deliberately disturb the animal or intentionally or recklessly disturb them in a place used for shelter or protection;
- Damage or destroy a breeding site or resting place;
- Intentionally or recklessly damage, destroy or obstruct access to a place used for shelter or protection.

3.15 The NERC Act also listed species of principle importance under Section 41 of the Act. This places further duties on the LPA to have due regard for the conservation of these species, such as hedgehog or certain bird species, which may be present on-site.

4.0 Methodology

Data Search

4.1 Online sources were reviewed, such as MAGIC³, to search for designated sites, priority habitats and records of local European Protected Species (EPS) licence. In addition, the Wiltshire Council planning portal was searched for nearby applications. A previous application was submitted in 2012 for a residential redevelopment of the wider site, which included a full Extended Phase I habitat survey and the historic data from the application, has been considered with this report.

4.2 Given the small scale of the development and habitats within the locality, a full data search was not considered necessary.

Preliminary Ecological Appraisal

4.3 The site was surveyed on 18th November 2025 by Ceri Griffiths, Director of Herdwick Ecology, with full membership of Chartered Institute of Ecology and Environmental Management (CIEEM) and a Natural

³ <https://magic.defra.gov.uk/>

England bat and great crested newt licence holder. Weather conditions were dry and overcast, with a temperature of 3°C.

Biodiversity Net Gain Assessment

4.4 The Statutory Biodiversity Metric is designed to provide a quantitative approach to assessing the changes in biodiversity value brought about by development or changes in land management. It is a habitat-based approach and uses the attributes of a habitat to provide a biodiversity value based on components such as distinctiveness, condition and strategic significance of the existing habitat as well as time to establish and difficulty of creation for proposed habitats.

4.5 The baseline BNG calculations, as outlined below, provides a numerical habitat value which indicates the existing value of the habitats present on the site based on the identified habitat types and their condition score.

Pre-development habitat baseline approach

4.6 The habitat baseline used to support the biodiversity net gain assessment has been taken from an habitat survey undertaken by Herdwick Ecology in November 2025. The Baseline Habitat data is illustrated in Figure 1 below.

4.7 The Statutory Biodiversity Metric habitat types are based on a set of habitats as defined by the UK Habitat Classification System (UK Habitat Classification Working Group, 2018), although there are some discrepancies between how some habitats are defined, as not all UK Habitat Classification System primary habitat types are included within the selection of habitats included within the metric.

5.0 Baseline Conditions

5.1 The Application Site lies in a rural location to the south of the village of Bromham in Wiltshire, 3.5 miles to the northwest of Devizes. It lies to the north of a small industrial site, comprising modern units, which is situated off New Road. There are a number of individual residential properties within the locality. The wider landscape is mainly agricultural, with some equestrian land interspersed with hedgerows and swathes of woodland. The predominantly tree/scrub lined Clackers Brook and its tributaries lies approximately 280m to the southwest.

5.2 Historically, the industrial units and wider application site was used for vegetable processing and distribution centre for a local producer. The Application Site was informally used as storage and comprised of a large area of bare ground in 2012 when an Extended Phase I Habitat Survey was carried out to inform a planning application for the site. A review of historic aerial imagery shows that there has been a varying amount of vegetation cover on the site since 2012 but with visible areas of bare ground and levels of use/disturbance.



Plate 1: Site Location

Data Search

Statutory and Non-Statutory Designated Sites

- 5.3 The Application Site lies within the consultation zone of the Bath and Bradford on Avon Bat Special Area of Conservation (SAC). This SAC comprises a number of individual sites across the wider landscape that support a larger population of greater and lesser horseshoe bats and Bechstein's bats. As stated within the Wiltshire Council planning guidance⁴, *'the populations of bats supported by these sites are afforded very high levels of legal protection, placing significant duties on decision-makers to prevent damage to bat roosts, feeding areas and the routes used by bats to travel between these locations'*.
- 5.4 There are no designated sites within 2km of the Application Site. The closest is the Spye Park Site of Special Scientific Interest (SSSI) that lies approximately 2.6km to the north. This SSSI is notified for its extensive habitat mosaic comprising large expanses of some of the finest undisturbed alderwoods in the county, along with oakwoods, parkland and an area of dry acidic grassland containing several locally uncommon plants and lichens. The Application Site does not lie within a SSSI risk zone for this development type
- 5.5 The closest non-statutory site is the Clinghill Wood that lies 550m to the south. This is an area of ancient semi natural woodland with an area of managed coppice.

⁴ [DRAFT](#)

Habitats

- 5.6 There are two parcels of deciduous woodland, a priority habitat within 500m of the Application Site. These lie 307m to the southwest and 450m to the east.
- 5.7 A waterbody is present 110m to the north of the Application Site. There are an additional five possible ponds identified between 250m to 500m from the Application Site boundary.

Species

- 5.8 There are three European Protected Species (EPS) licences within 4km of the site boundary.:
- Common & soprano pipistrelle and lesser horseshoe bat resting place (dated 2020-2030) – within 1.7km southeast
 - Common & soprano pipistrelle, brown long-eared and whiskered bat breeding and resting place (dated 2019-2024) – 2.9km west;
 - Soprano pipistrelle bat resting site (dated 2019-2025) – 3.6kmsouth
- 5.9 There is no EPS licence for great crested newts or eDNA data 2km of the site.

Preliminary Ecological Appraisal

- 5.10 The Application Site is 2250m² in area and comprises an area of bare ground that has recently been lined and covered in hardcore. A fence line runs along the northern and eastern boundary, of leylandii hedgerow within the fenceline along the southern edge of the western boundary. The site is open to the site. Towards the northern side of the site there are earth spoil mounds across which ruderal/ephemeral vegetation is beginning to establish. In accordance with the BNG regulations, the baseline should be backdated if site clearance has occurred in advance of the habitat assessment. In this case, the previous ecological survey is beneficial, and, together with the historic aerial imagery, demonstrates that the Application Site has had varying amount of disturbance, and vegetation cover, over the years. Therefore, whilst there has been some site clearance, given that it was previously classified as bare ground, it has been assessed as such for this purpose of this assessment.
- 5.11 The disturbed ground towards the north has patches of ruderal and ephemeral vegetation comprises false oat grass *Arrhenatherum elatius*, Annual meadow-grass *Poa annua*, *Lolium perenne*, cock's foot *Dactylis glomerata*, spear thistle *Cirsium vulgare*, common fumitory *Fumaria officinalis*, common chickweed *Stellaria media*, scentless mayweed *Tripleurospermum inodorum*, nettle *Urtica dioica*, periwinkle *Vinca* sp., black nightshade *Solanum nigrum*, prickly sow-thistle *Sonchus asper*, common hedge mustard *Sisymbrium officinale*, broadleaf plantain *Plantago major*, ground ivy *Glechoma hederacea*, creeping thistle *Cirsium arvense*, white campion *Silene alba*, broad leaved dock *Rumex obtusifolius*, spear thistle, field bindweed *Convolvulus arvensis* and creeping buttercup *Ranunculus*

repens. The habitat has been assessed as urban u1b6 (SVL in BNG metric) with ruderal/ephemeral (secondary code 81).

- 5.12 The UK Habitat Classification and Biodiversity Metric equivalents are provided in Table 1 below, along with justification for the habitat choice, where relevant.

Table 1: Baseline Habitats

UK Habitat equivalent	BNG Metric & Condition	Justification
Urban – Bare Ground U1b6 82	Bare Ground – Poor Condition	No criterion met
Urban – Bare Ground U1b6 81	Sparsely Vegetated Ground – ruderal/ephemeral . Poor condition	Justification provided above. Poor condition as passes one criterion (B)
Hedgerow (non-native) h2b 528	Lleynadii hedgerow – Poor condition	Unmanaged hedgerow with almost no ground flora due to species and heavy shading.



Plate 2: Baseline Habitats and Condition

- 5.13 The baseline habitat value, as assessed using the Biodiversity Metric is 0.45 habitat units, as shown in Table 2 below, with a linear value of 0.03 units.

Table 2: Baseline Habitat Values

Habitat type	Area (ha)	Strategic significance	Habitat units
Urban – Bare Ground	0.16257	No local strategy	0.33
Sparsely Vegetated Ground – Ruderal / Ephemeral	0.0623	No local strategy	0.12
Total habitat area	0.23		0.45

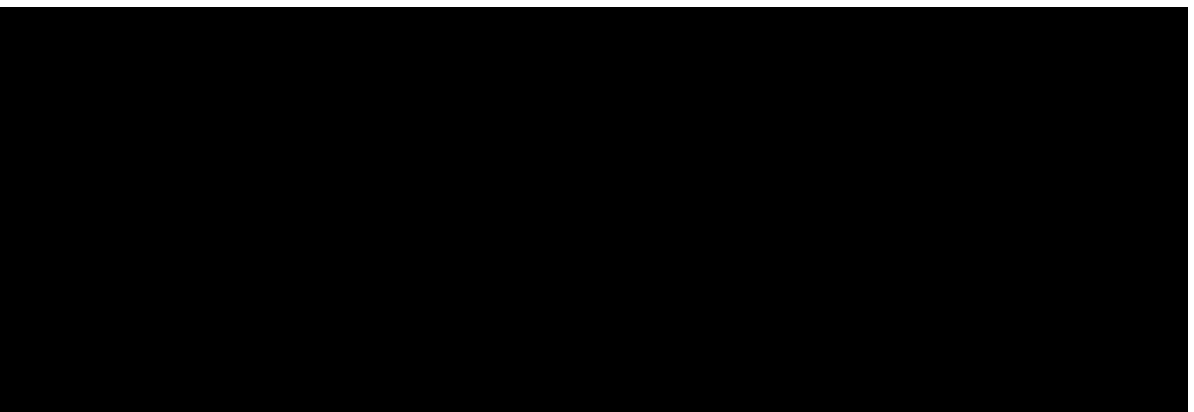
Table 3: Baseline Linear Values

Habitat type	Length (km)	Strategic significance	Habitat units
Urban – Bare Ground	0.026	No local strategy	0.03
Total habitat area	0.026		0.03

*Species*Bats – Foraging/Commuting Habitats

- 5.14 There are no buildings within the application boundary and no potential roost features were noted with the leylandii. The surrounding habitats are likely to offer foraging and commuting habitat for bats, including those associated with the Bath and Bradford on Avon SAC. However, due to the small scale of the development and size of Application Site, the loss of a small area of ruderal vegetation will not have a detrimental impact to the local bat population. No further survey or assessment is required but avoidance, minimisation and enhancement measures have been set out in Section 5.

5.15

Breeding Birds

- 5.16 The site offers limited opportunities for nesting birds, given the lack of dense vegetation and trees. The leylandii may offer some nesting habitat, but it is not considered significant and no further survey or assessment is required. Avoidance, minimisation and enhancement measures have been set out in Section 5

Amphibians - Great crested newts (GCN)

- 5.17 The desk study carried out for the previous application did not return any records for GCN. The Application Site lacks vegetation that would offer shelter for great crested newts. Whilst there is a pond within 250m of the site, given this lack of suitable terrestrial habitat, it is considered highly unlikely that great crested newts will be impacted on by the proposals. This can be substantiated through the use of the Natural England rapid risk assessment, as illustrated below (using SVL only). This is also precautionary as it assumes that the pond is used for breeding.

Table 4: NE Risk Assessment

Component	Likely effect (select one for each component; select the most harmful option if more than one is likely; lists are in order of harm, top to bottom)	Notional offence probability
Great crested newt breeding pond(s)	No effect	0
Land within 100m of any breeding pond(s)	No effect	0
Land 100-250m from any breeding pond(s)	0.01 - 0.1 ha lost or damaged	0.01
Land >250m from any breeding pond(s)	No effect	0
Individual great crested newts	No effect	0
Maximum:		0.01
Rapid risk assessment result:		GREEN: OFFENCE HIGHLY UNLIKELY

- 5.18 As such, whilst no further survey or assessment is required, a precautionary site clearance approach should still be adopted, as set out in Section 5 below.

Reptiles

- 5.19 As with the amphibians, the site is considered to offer negligible potential for reptiles. No further surveys or assessment is required and standard practice site clearance and construction measures are recommended.

Other protected/notable species

- 5.20 There is no suitable habitat for dormice. Other species that could be present within the locality are hedgehogs. Again, standard best practice site construction methods should be adopted, where necessary, as detailed in Section 5.

6.0 Avoidance, Mitigation and Enhancement Measures

Mitigation and Enhancement Measures

- 6.1 In line with National and Local planning policies, developments should seek to ensure the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species populations. Therefore the following section sets out avoidance and mitigation measures that should be implemented, together with enhancement opportunities, with the aim of delivering a net gain in biodiversity, in line with the mitigation hierarchy.

Development Description

- 6.2 No further surveys are required to inform the application but appropriate measures to be implemented during construction are set out below.

Development Description and Biodiversity Net Gain

- 6.3 The proposals will involve the consolidation of an outside storage area. This will result in the loss of the earth/sparsely vegetated mounds and ruderal vegetation. The species poor/non-native hedgerow will be retained, with a newly planted hornbeam/beech hedgerow along the eastern boundary to aid in the visual screening of the site. In order to deliver the 10% net gain onsite, an area of 0.023ha of g3c 'other neutral grassland' will be created along the northern boundary, together with the planting of 30 small trees (7.5cm diameter at 1m height - poor condition) within the Application Boundary.

- 6.4 Tree species will be a mix of small native trees:

- Hazel *Corylus avellana*
- Field maple *Acer campestre*
- Bird cherry *Prunus padus*
- Blackthorn *Prunus spinosa*
- Rowan *Sorbus aucuparia*

Table 5: Habitats Created

Habitat type	Area (ha)	Condition	Habitat units
Urban – Developed land/sealed surface u1	0.21	n/a	0.00
Grassland – other neutral g3c	0.023	Moderate	0.15
Rural Tree	0.1221	Poor	0.34
Total area (ex trees)	0.23		0.50 (rounded up)
Total area (ex trees)	0.36		

Table 6: Hedgerow Created

Habitat type	Length (km)	Condition	Habitat units
Hedgerow – Native h2a	0.0887	Poor	0.17
Total area	0.0887		0.17

Table 7: Change in Biodiversity Units

Post-Development Biodiversity Units (created & enhanced plus retained)		Pre-Development Baseline Biodiversity Units		Change in Biodiversity Units
0.50 (Habitats)		0.45		+ 0.05 (10.22%)
0.20 (Linear)		0.03		+ 0.17 (653%)

6.5 In conclusion, the proposals results in a habitat biodiversity net gain of **10.22%** and a hedgerow net gain of **653%** and the trading rules have been met.



Plate 3 Proposed Landscape Plan showing BNG Enhancement Areas

6.6 The newly created grassland areas (within the BNG enhancement area) will be seeded with a more diverse mix, such as EM2 Standard General Purpose Meadow Mixture⁵.

6.7 In order to meet the target 'moderate condition' for the grassland on the verge, 3 – 5 of the following measures must be delivered (and 5 to achieve 'good')

- A) The appearance and composition must fit the UKHab definition of other neutral grassland;
- B) The sward height must be varied with at least 20% of the sward >7cm in height, and 20% <7cm;
- C) Bare ground is only between 1 to 5%
- D) No bracken or scrub encroachment should be allowed to establish;

⁵ [EM2 Standard General Purpose Meadow Mixture - Emorsgate Seeds \(wildseed.co.uk\)](https://www.wildseed.co.uk/em2-standard-general-purpose-meadow-mixture/)

- E) No invasive non-native species should be present or physical damage present (i.e. from storage, machinery etc)
- F) There are 10 or more vascular plants species per m² present (excluding species that are considered suboptimal for this habitat type).

6.8 Given that no significant enhancement measures have been incorporated into the design, a Habitat Management and Monitoring Plan (HMMP) and monitoring via a S106 is not considered necessary to implemented the above, given that it is for a small habitat area). A Landscape and Ecological Management Plan (LEMP) is considered for appropriate to ensure the delivery of the proposed landscape plan.

Mitigation Measures

6.9 Given the low ecological value of the site, there are minimal mitigation requirements but following measures should be implemented and secured via condition attached to the planning consent:

- Any new lighting will need to be sensitively designed to avoid light spill along the boundaries. This is of particular importance as the Application Site lies within the consultation zone of the Bath and Bradford on Avon SAC. Any new lighting should be designed and adhere to the principles set out in the ILP Guidance Note 08/18 Bats and artificial lighting in the UK to avoid excessive light spill.
- Foundation trenches and all excavations must either be covered overnight or must have scaffolding boards, or similar, placed within them to ensure that any animals that fall in are able to escape.
- Raise stored materials (that might act as temporary resting places for species such as amphibians and reptiles) off the ground, e.g. on pallets.
- Should any fencing be installed, occasional gaps must be left at the base (130 x 130mm) to allow movement of hedgehogs.

Species Enhancements

6.10 Habitat boxes or log piles for invertebrates, hedgehogs and reptiles can be placed along the eastern, western and northern boundaries to provide opportunities for species

6.11 In conclusion, the Application Site comprises habitats of low value and has negligible potential to support protected/notable species. A 10% net gain in biodiversity can be deliver and the proposals are in line with National and Local Planning Policy.

Appendix 1 Site Photographs



Plate A1: View across site looking north



Plate A2: Hedgerow along southern side of western boundary



Plate A3: Earth mounds to the northern side of the site