

Manor Farm, Froxfield

Biodiversity Net Gain Assessment

Prepared on behalf of Ben Paterson

March 2025

Manor Farm, Froxfield

Ecology 8756

Version 01

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1.0 Executive Summary

- 1.1 Pro Vision Ecology were commissioned in January 2025 to carry out a Biodiversity Net Gain assessment of the land at Manor Farm, Froxfield, West Berkshire. The aim of the assessment was to establish how a 10% net gain in habitat units will be achieved within the development.
- 1.2 The proposed development will include the removal of ephemeral vegetation and the installation of 20 shipping containers to be used for storage.
- 1.3 The site includes developed land , with artificial unvegetated, unsealed surface comprising gravel tracks with ruderal/ephemeral vegetation and a section of modified grassland within a field adjacent to the south of the site.
- 1.4 The baseline habitats of the site have a low ecological value due to the habitats on site mostly comprising low distinctiveness habitats including modified grassland, and ruderal/ephemeral vegetation.
- 1.5 The development will result in a net gain of 0.02 habitat units (16.40%). This will be achieved by enhancing a strip of modified grassland from moderate to good condition and through the planting of three small native trees within this grassland strip.
- 1.6 With these measures in place the development will provide the required net gains in biodiversity in line with the Environment Act 2021.

2.0 Introduction

Project Background

- 2.1 Pro Vision Ecology were commissioned in January 2025 to carry out a Biodiversity Net Gain (BNG) assessment of the site at Manor Farm, Froxfield, West Berkshire. This report will contribute to a planning application to be submitted by the Client to Wiltshire Council for planning consent for the installation of 20 shipping containers to be used for storage (**Appendix A**).
- 2.2 This report provides the details for the BNG assessment and should be read alongside the submitted Statutory Biodiversity Metric and Condition Assessments.

Brief

- 2.3 To carry out a BNG assessment of the site to determine the opportunities for net gain.

Relevant Legislation and Planning Policy

- 2.4 The key legislative provisions of relevance to this report with respect to the development proposals and their potential effects on ecological features are listed below:
- The Conservation of Habitats and Species Regulations 2017 (as amended)
 - The Wildlife and Countryside Act 1981 (as amended)
 - The Natural Environment and Rural Communities (NERC) Act 2006
 - Environment Act 2021
- 2.5 The UK Biodiversity Action Plan (BAP) was the Governments response to the 1992 Convention on Biodiversity (The Rio Convention), with the aim of halting the loss of biodiversity in the UK. The new UK post-2010 Biodiversity Framework replaced the previous BAP and is the government's response to the new strategic plan on the United Nations Convention on Biological Diversity (CBD). Although the UK post-2010 Biodiversity Framework supersedes the UK BAP, the UK BAP lists of priority species and habitats still remain an important reference source for identifying habitats and species of principal importance within the UK. Within England, Section 41 of the NERC Act (2006) lists species and habitats of principal importance for the conservation of biodiversity.
- 2.6 The Government has set out its policies for the protection and enhancement of biodiversity through the planning system in the National Planning Policy Framework policy 15 (NPPF, 2024).
- 2.7 The Environment Act 2021 includes the requirement for developments to provide 10% biodiversity net gain, to be evidenced with the use of the statutory metric. Developments are exempt if they are self-build comprising less than nine dwellings on an area less than 0.5 hectares, householder applications or developments below the threshold of impacts to habitats.
- 2.8 The application site is located within Wiltshire Council. The Wiltshire Council Core Strategy (2012-2026), adopted January 2015, includes Policy 50 relating to Biodiversity and Geodiversity, which states:

Biodiversity and Geodiversity

Protection

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. Where it has been demonstrated that such features cannot be retained, removal or damage shall only be acceptable in circumstances where the anticipated ecological impacts have been mitigated as far as possible and appropriate compensatory measures can be secured to ensure no net loss of the local biodiversity resource and secure the integrity of local ecological networks and provision of ecosystem services.

All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development.

Any development potentially affecting a Natura 2000 site must provide avoidance measures in accordance with the strategic plans or guidance set out in paragraphs 6.75-6.77 above where possible, otherwise bespoke measures must be provided to demonstrate that the proposals would have no adverse effect upon the Natura 2000 network. Any development that would have an adverse effect on the integrity of a European nature conservation site will not be in accordance with the Core Strategy.

Biodiversity Enhancement

All development should seek opportunities to enhance biodiversity. Major development in particular must include measures to deliver biodiversity gains through opportunities to restore, enhance and create valuable habitats, ecological networks and ecosystem services. Such enhancement measures will contribute to the objectives and targets of the Biodiversity Action Plan (BAP) or River Basin/ Catchment Management Plan, particularly through landscape scale projects, and be relevant to the local landscape character.

Local Sites

Sustainable development will avoid direct and indirect impacts upon local sites through sensitive site location and layout, and by maintaining sufficient buffers and ecological connectivity with the wider environment. Damage or disturbance to local sites will generally be unacceptable, other than in exceptional circumstances where it has been demonstrated that such impacts:

- i. cannot reasonably be avoided.*
- ii. are reduced as far as possible.*
- iii. are outweighed by other planning considerations in the public interest.*
- iv. where appropriate compensation measures can be secured through planning obligations or agreements.*

Development proposals affecting local sites must make a reasonable contribution to their favourable management in the long-term.

3.0 Methodologies

Strategic Significance

- 3.1 A data-gathering exercise was undertaken to obtain any available information relating to statutory and non-statutory nature conservation sites to establish the strategic significance of the site, outlined within **Table 1**.

Table 1: Summary of information sources used for the Desk Study.

Organisation / Source	Information Sought
Wiltshire Council	Locations of priority habitats and ecological networks within one kilometre of the site.
MAGIC	Locations of and citations for all national statutory wildlife sites, including SSSI, within two kilometres and all international sites including SAC, SPA or Ramsar sites within five kilometres of the site.
Ordnance Survey Maps	Large scale habitat information and identification of off-site habitats which may require consideration (such as ponds) within 500m.

Baseline Assessment

- 3.2 A site visit was undertaken on 27th January 2025 by David Casson ACIEEM during mixed weather conditions of clouds, wind, and sunny spells with a rain shower at the start of the survey and an ambient temperature of 5°C. The survey employed techniques based on the UK Habitat Classification System.
- 3.3 The collection of botanical information focused on the dominant and/or key indicator species for each habitat, to allow allocation of habitats to hierarchy levels 3 and/or 4 and where relevant to identify any priority habitats which are present on site.
- 3.4 The conditions of the habitats on the site were assessed in line with the condition sheets supplied alongside the Statutory Biodiversity Metric.

Limitations

- 3.5 The surveys were completed outside the optimum time for botanical surveys; therefore, some species are likely to have been missed but a suitable assessment of the habitats has been possible for the purpose of this application.

Biodiversity Net Gain Hierarchy

- 3.6 The scheme has been designed in line with the BNG hierarchy:
- Enhance and restore biodiversity on-site (within the red line boundary of a development site).
 - If developers can only achieve part of their BNG on-site, they can deliver through a mixture of on-site and off-site. Developers can either make off-site biodiversity gains on their own land outside the development site or buy off-site biodiversity units on the market.
 - If developers cannot achieve on-site or off-site BNG, they must buy statutory biodiversity credits from the government. This must be a last resort. The government will use the revenue to invest in habitat creation in England.

Biodiversity Net Gain

- 3.7 On completion of the fieldwork the habitat information was mapped using Biodiversity Metric QGIS template and areas were imported into the Statutory Biodiversity Metric calculation tool using the GIS Import tool. The metric calculates the baseline biodiversity units for the site based on the following factors:
- Area
 - Habitat distinctiveness
 - Habitat condition
 - Strategic significance
- 3.8 The proposed habitat creation measures were selected in line with the site conditions and the surrounding habitats, with consideration of the aims of the local area. Once inputted the metric provides biodiversity units for the proposed habitats based on the following factors:
- Area
 - Habitat distinctiveness
 - Habitat condition
 - Strategic significance
 - Time habitat is created
 - Time to target condition
 - Difficulty of creation
- 3.9 The difference between the baseline units and proposed units is then used as a measure of change and is used to assess the number of biodiversity units achieved. Habitats, hedgerows and rivers are inputted as separate factors, with each requiring net gains, where present on a site.

4.0 Baseline Conditions

- 4.1 The results of the baseline survey are presented below. The habitat survey map is shown in **Appendix B**. The map illustrates the location and extent of the site surveyed, along with additional notable features. Full condition assessments have been provided alongside this report. There is no evidence of any deliberate habitat degradation works on the site since January 2020 and full condition assessments have been completed. There are no irreplaceable habitats on the site.

Strategic significance

- 4.2 The Nature Recovery Network is currently being developed by Wiltshire Council and therefore strategic significance has been determined in the absence of any formal plan and based on the location of statutory sites and priority habitat on site.
- 4.3 There are no areas of priority habitat present in proximity to the site however a small chalk stream runs under the access track of the site with surrounding wet grassland habitats. The site itself has no medium or high distinctiveness habitat present on site and the quality of the habitats are poor.
- 4.4 Due to the lack of higher distinctiveness habitats on site, the on-site habitats are considered to be in an area not recognised within a local strategy.

On-site Habitats

Surrounding Habitat

- 4.5 The site is located in the southeast of Froxfield, Marlborough, adjacent to a sewage treatment plant. The surrounding habitats mostly comprise agricultural land to the north, east and south with the residential area of Froxfield located to the west. A fragmented area of land is located to the south of the site. A chalk stream runs under the access track to the site with adjacent areas of wet grassland on either side of the access track. This is an existing river crossing and therefore watercourse units are not applicable to this application with the main development located over 10 metres from the river. Two barns are present on the northern boundary of the southern section of the site.

Artificial Unvegetated, Unsealed Surface

- 4.6 The access track to the site and sections of the eastern area of the site comprises a gravel surface that is regularly used for site access and access to the adjacent sewage treatment plant (**Figures 1 and 2**).



Figures 1 and 2: Access track and gravel area in east of site, respectively.

Developed Land; Sealed Surface

- 4.7 A hardstanding track runs through the southern section of the site comprising tarmac and is regularly used (**Figure 3**).



Figure 3: Hardstanding track.

Ephemeral Vegetation

- 4.8 Areas of ephemeral vegetation are present along the southern boundary of the site. The southern strip of vegetation is very scarce and has colonised spoil mounds and discarded debris (**Figure 4**). The species present comprise abundant mosses with frequent broadleaved dock (*Rumex obtusifolius*), occasional common nettle (*Urtica dioica*), dove's foot cranesbill (*Geranium mole*) and perennial rye-grass (*Lolium perenne*) and rare bristly ox-tongue (*Helminthotheca echioides*) and thistle (*Cirsium* sp.). Dove's foot cranesbill and perennial rye-grass is more frequent at the entrance to the southern grassland (**Figure 5**).



Figures 4 and 5: Strip of ephemeral vegetation along southern boundary.

Modified Grassland

- 4.9 A small strip of modified grassland is present within the red line boundary and is part of a large field adjacent to the south of the site (**Figures 6 and 7**), the field is occasionally grazed. The grassland is tussocky and is dominated by cock's foot (*Dactylis glomerata*) with occasional common nettle and herb Robert (*Geranium robertianum*) and rare dove's foot cranesbill and ribwort plantain (*Plantago major*). Within the strip of grassland, a brash pile of discarded timber is present as well as the remains of a timber shed. This has caused bramble (*Rubus fruticosus*) to encroach in these areas as well as most abundant common nettle.



Figures 6 and 7: Modified grassland strip in the south of the site.

- 4.10 Due to the timing of the survey, it is considered that the grassland contains at least six species per square metre. The grassland has a varied sward height and has no bracken or invasive species present. Due to the presence of the brash pile and collapsed shed, there are areas of bare ground present, physical damage and an encroachment of bramble. The grassland is therefore considered to be in moderate condition.

Baseline summary

- 4.11 The current habitat baseline is provided below in **Table 2**. The on-site area has a baseline of 0.10 habitat units.

Table 2: Statutory Biodiversity Metric baseline for habitats.

On-site Habitat Baseline					
Habitat	Biodiversity Units	Area (ha)	Condition	Distinctiveness	Suggested action
Developed Land; Sealed Surface	0.00	0.0181	N/A	Very Low	No action required
Artificial Unvegetated, Unsealed Surface	0.00	0.0831	N/A	Very Low	No action required
Ruderal/ Ephemeral	0.04	0.0205	Poor	Low	Same distinctiveness or better habitat required
Modified Grassland	0.06	0.014	Moderate	Low	Same distinctiveness or better habitat required

5.0 Proposed Habitats

- 5.1 The proposed plans have been designed to retain and enhance as much of the existing habitats as possible. The plans are for the clearance of the ephemeral vegetation areas and to install 20 shipping containers.
- 5.2 The enhancements and proposed habitats are detailed below and outline targeted habitats and conditions are shown in **Appendix C**.

Enhancement of Existing On-site Habitats

Modified Grassland

- 5.3 The grassland strip in the south of the site will be retained and enhanced, 0.014 hectares of modified grassland will be enhanced from moderate to good condition through aiming for the conditions outlined in **Table 3** below, which it currently fails.

Table 3: Condition assessment criteria to be met for modified grassland.

	Criteria	How it will be achieved
C	Any scrub present accounts for less than 20% of the total grassland area. (Some scattered scrub such as bramble <i>Rubus fruticosus</i> agg. may be present).	The brash pile will be removed, and any bramble present will also be cleared and these areas will then be managed as the rest of the grassland currently is.
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.	The brash pile and collapsed shed will be removed from the grassland, allowing these patches to recolonise with grassland
E	Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens).	The brash pile and collapsed shed will be removed from the grassland, allowing these patches to recolonise with grassland

Creation of New On-site Habitats

Individual Trees

- 5.4 Individual trees will be created in the southern section of the site, these will comprise three native trees (0.0122 hectares). In accordance with the Statutory Biodiversity Metric Use Guide (2023) it has been assumed that the newly planted trees will comprise small native trees. Due to the trees being planted within the grassland strip, it is considered that the trees will be able to achieve moderate condition through aiming for the conditions outlined in **Table 4**.

Table 4: Condition assessment criteria to be met for individual trees.

	Criteria	How it will be achieved
A	The tree is a native species (or at least 70% within the block are native species).	The planted trees will comprise native species.
B	The tree canopy is predominantly continuous, with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide (individual trees automatically pass this criterion).	The trees will be individual and therefore automatically pass this criterion.
D	There is little or no evidence of an adverse impact on tree health by human activities (such as vandalism, herbicide or detrimental agricultural activity). And there is no current regular pruning regime, so the trees retain >75% of expected canopy for their age range and height.	The trees will be sensitively managed with no extensive pruning regime. The trees will grow naturally within the grassland area.
F	More than 20% of the tree canopy area is oversailing vegetation beneath.	The trees will be planted within the grassland.

6.0 Biodiversity Net Gain Assessment

- 6.1 The Statutory Biodiversity Metric was run based on the measures outlined in **Section 5.0** and is shown in **Table 5**. The proposed plans will result in a net gain of 0.02 habitat units (16.40%).

Table 5: Statutory Biodiversity Metric results.

On-site baseline units	0.10
On-site units post-intervention	0.11
Combined net unit change	0.02 (16.40%)
Trading Rules Satisfied	Yes

- 6.2 With these measures in place the development will provide 10% net gains in habitat units and provide additional habitat for local wildlife. The enhancement measures provided are not considered significant and therefore do not need to be legally secured.

7.0 References and Bibliography

CIEEM, CIRIA, IEMA (2019). *Biodiversity Net Gain. Good practice principles for development. A practical guide*. CIRIA C776a. London, 2019.

Defra (2023). *The Statutory Biodiversity Metric– Habitat Condition Assessment Sheets with Instructions*.

Defra (2023). *The Statutory Biodiversity Metric - auditing and accounting for biodiversity calculation tool*.

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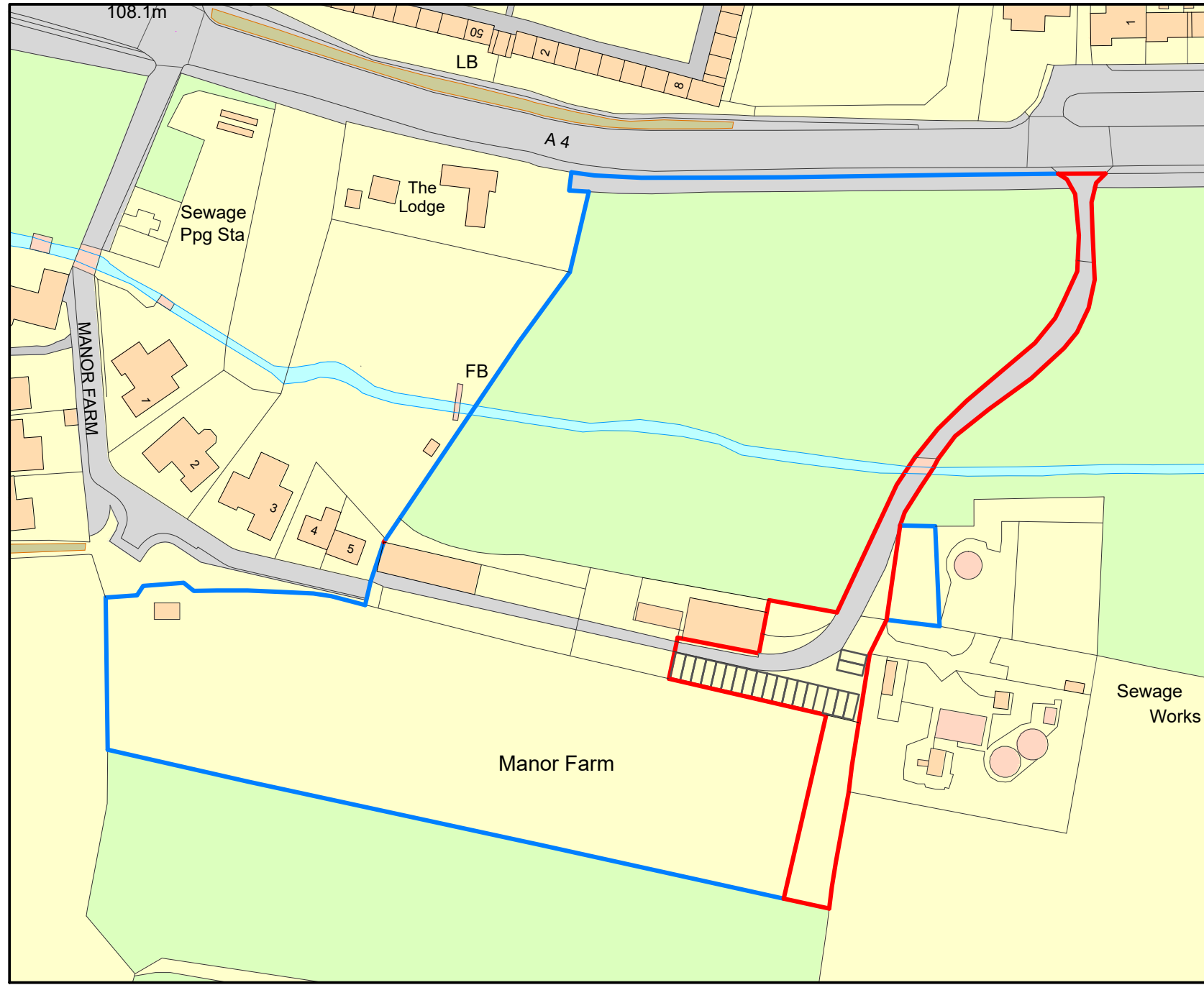
National Planning Policy Framework (2024). *National Planning Policy Framework*. Ministry of Housing, Communities and Local Government, London.

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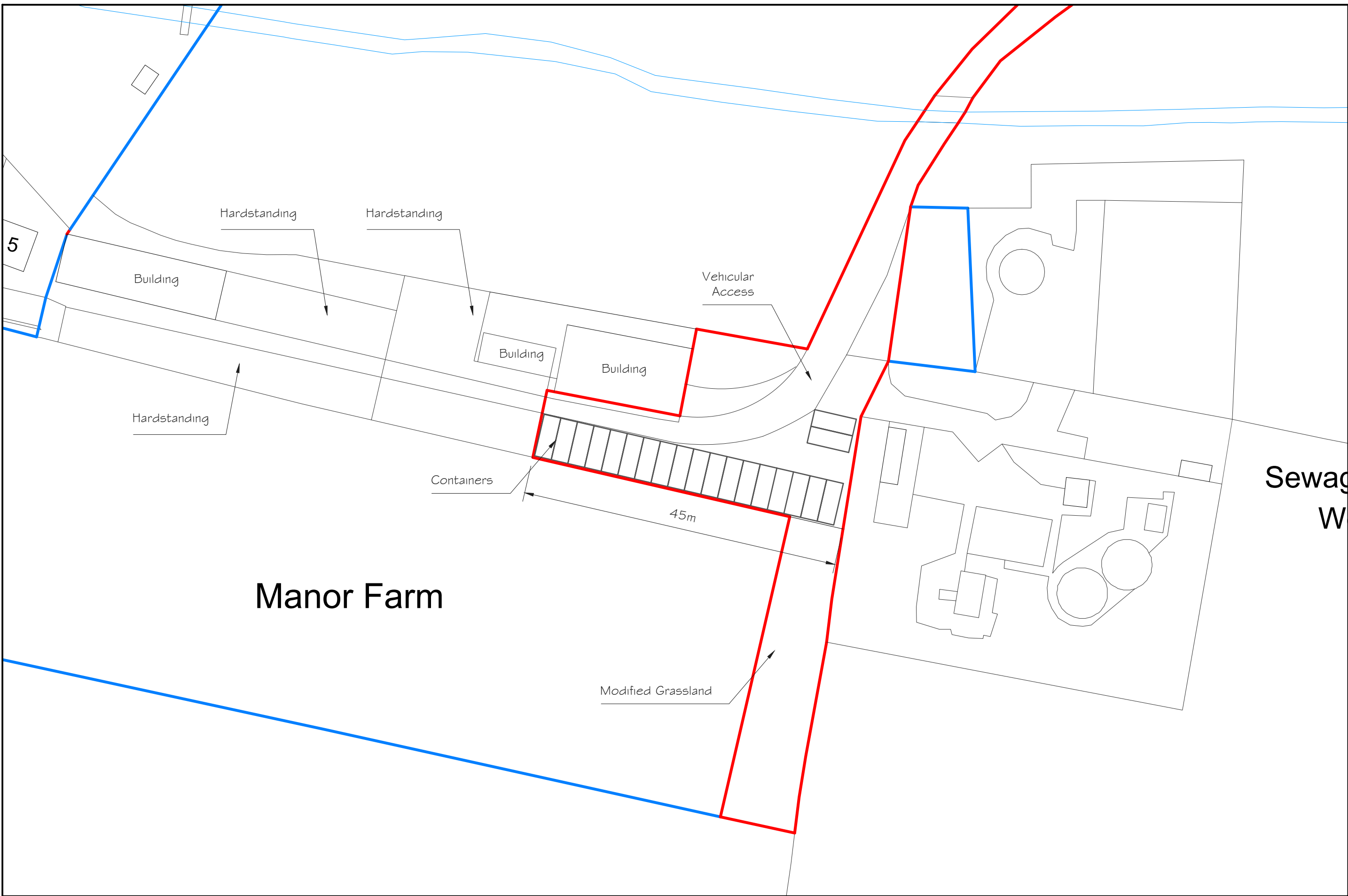
Wiltshire Council (2015). *The Wiltshire Council Core Strategy (2012-2026) adopted January 2015*.

Appendices

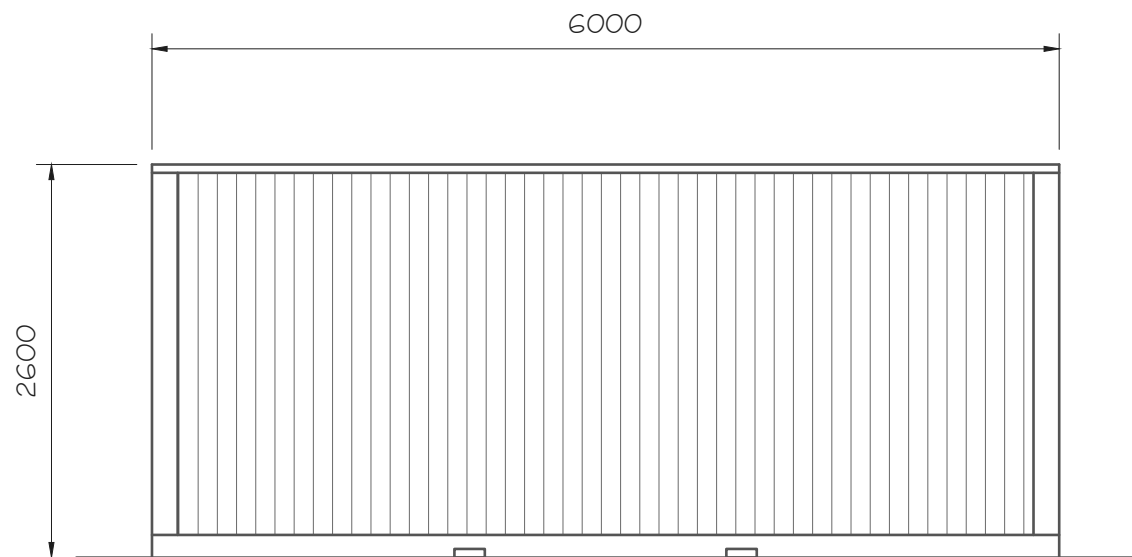
Appendix A: Proposed Plans



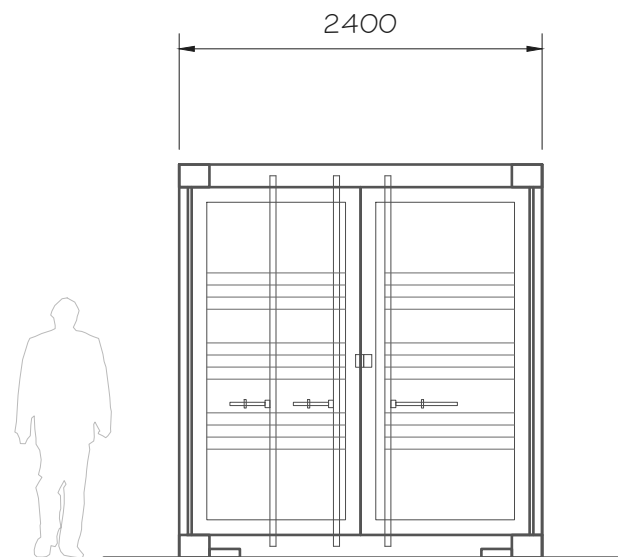
LOCATION PLAN
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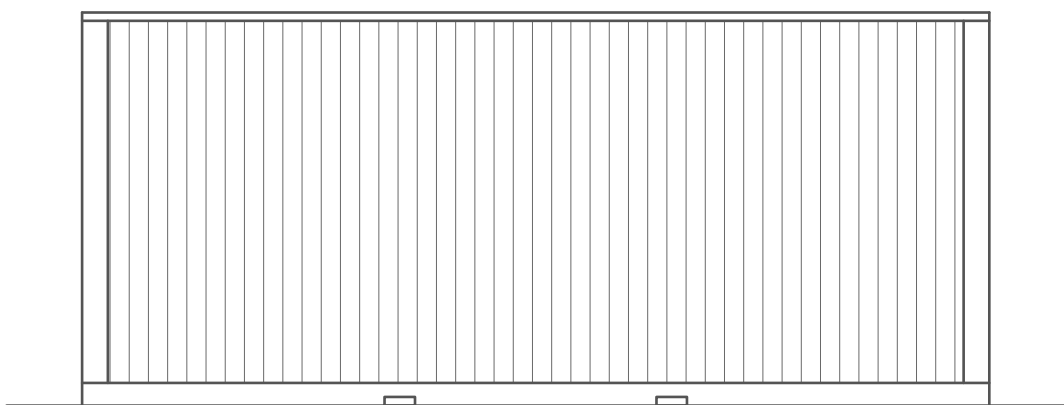
BLOCK PLAN
Scale 1:500



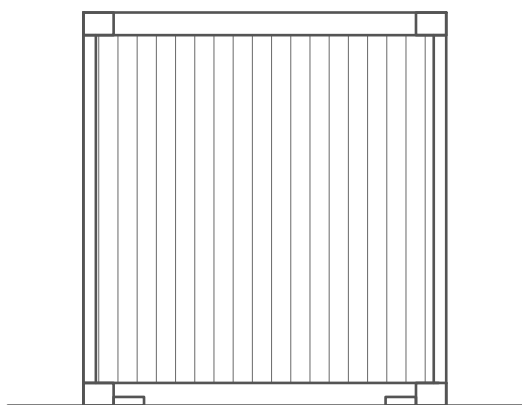
SIDE ELEVATION
Scale 1:50



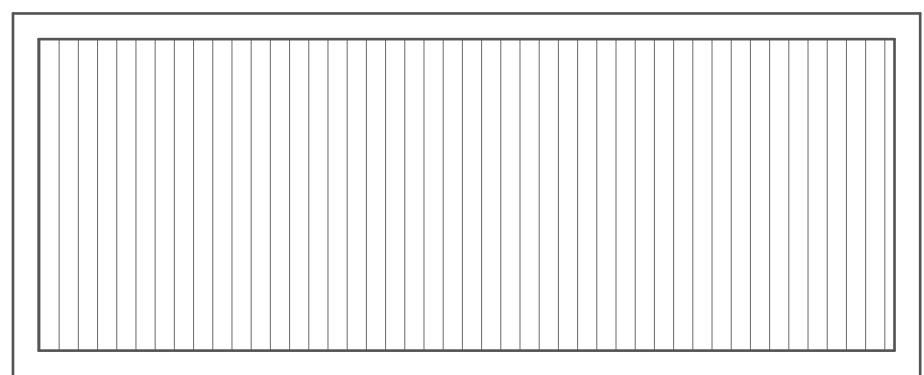
FRONT ELEVATION
Scale 1:50



SIDE ELEVATION
Scale 1:50



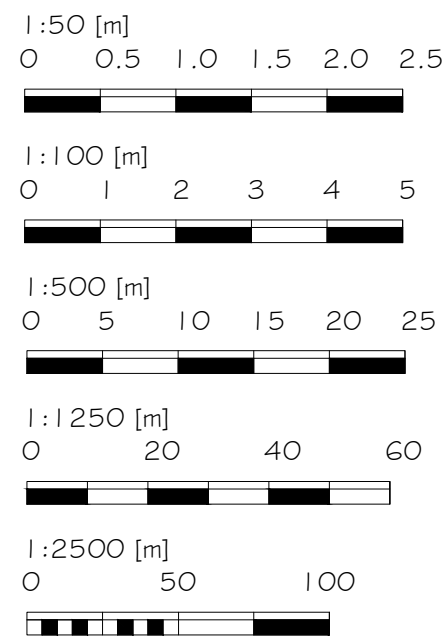
REAR ELEVATION
Scale 1:50



ROOF PLAN
Scale 1:50



FLOOR PLAN
Scale 1:50



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Client

BEN PATERSON

Job Title

CONTAINERS AT:
MANOR FARM, FROXFIELD,
WILTSHIRE.

Drawing Title

ELEVATIONS AND PLANS

Scale AS SHOWN

Date 12/02/2025 Drawn AD

Drawing No.

1510-01

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Appendix B: Baseline Habitats



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v1	10.03.25	First Issue	DC	LSJ

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Legend

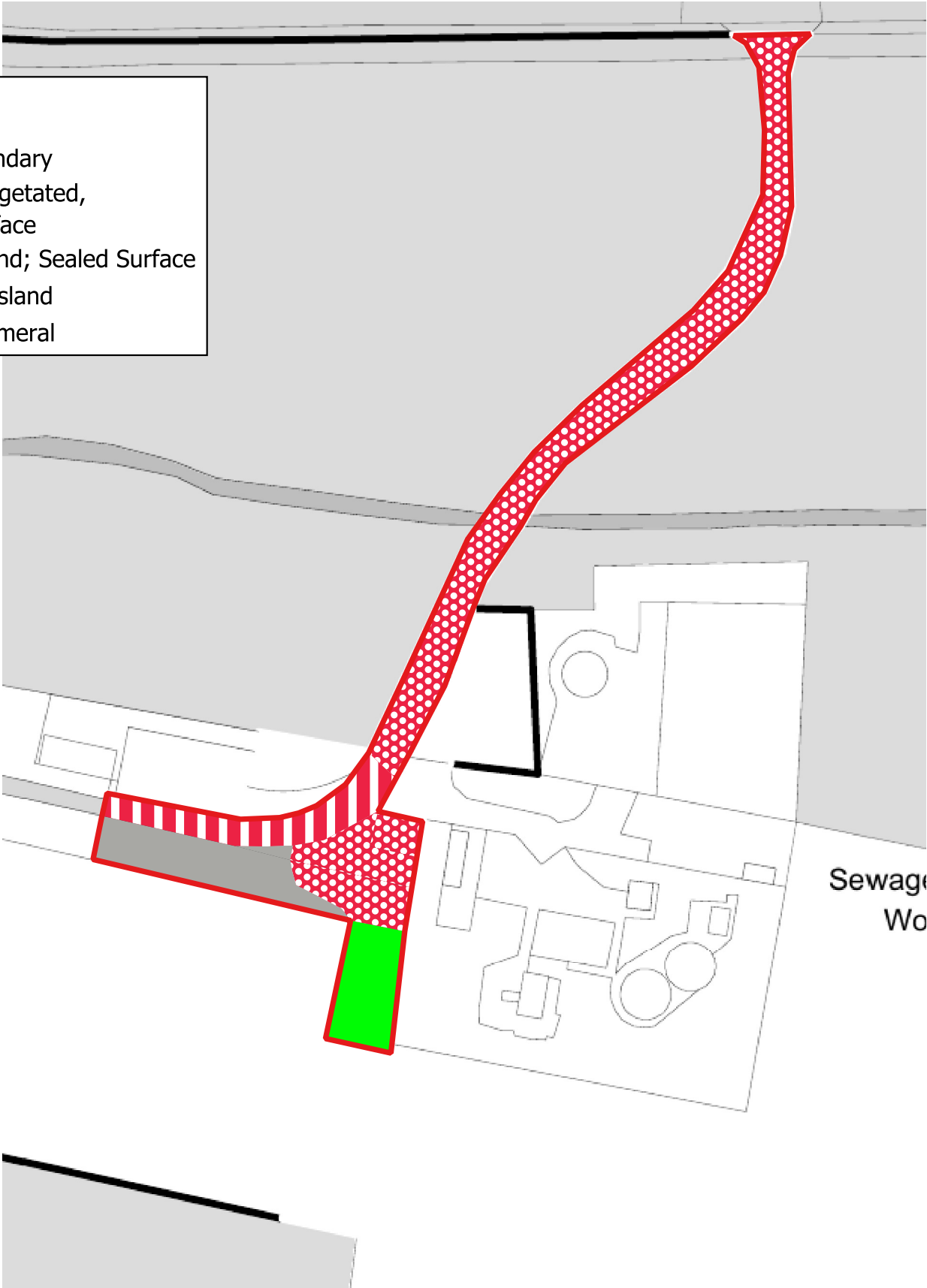
Red Line Boundary

Artificial Unvegetated, Unsealed Surface

Developed Land; Sealed Surface

Modified Grassland

Ruderal/Ephemeral



CLIENT:	Ben Paterson		
PROJECT:	Manor Farm, Froxfield		
DRAWING:	Baseline Habitats		1:800
NUMBER:	8756-XX-E0-01		A4
ISSUE:	v1		10.03.25

Appendix C: Proposed Habitats

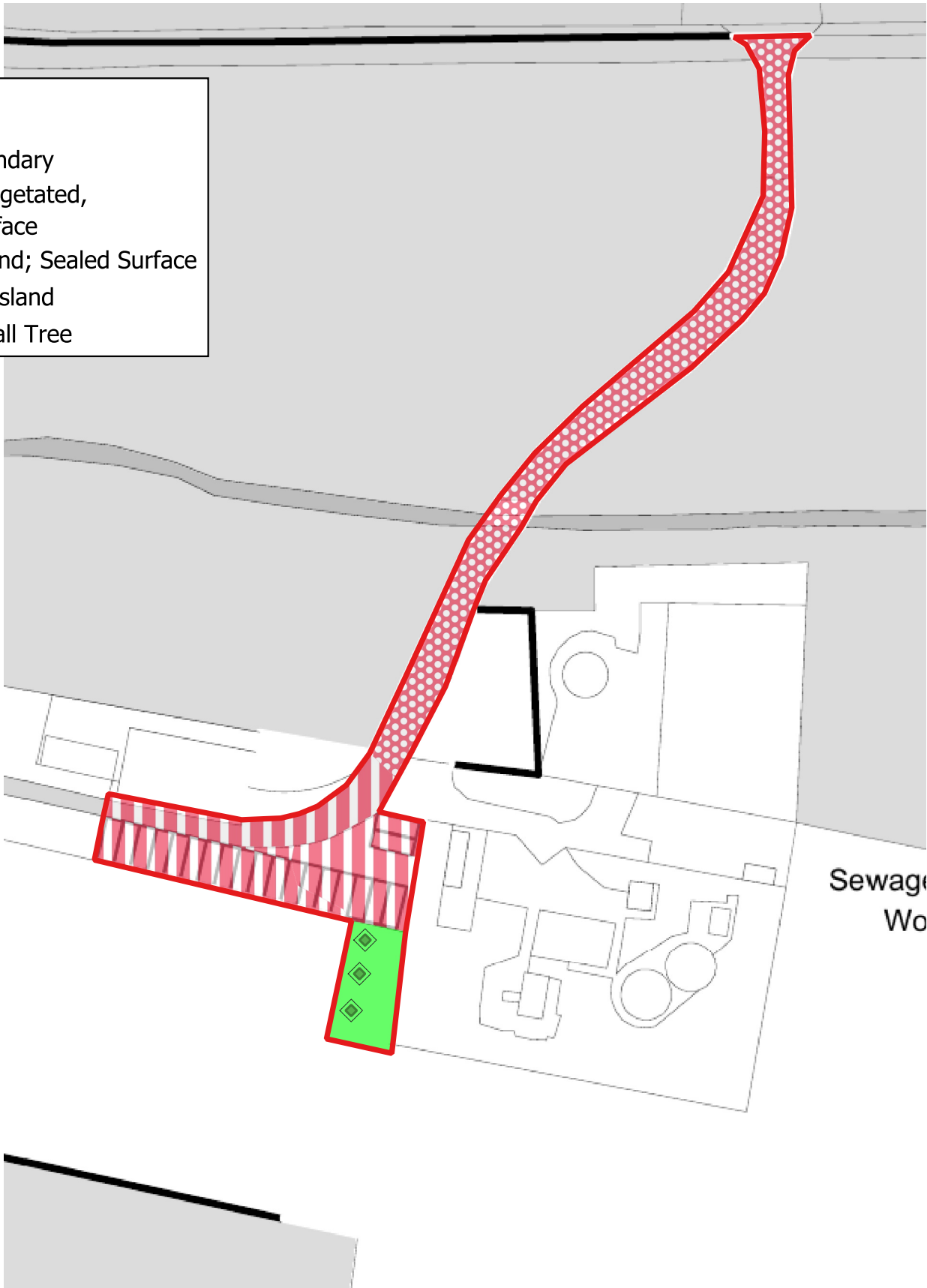


ISSUE	DATE	DESCRIPTION	DRAWN	CHECKED
v1	10.03.25	First Issue	DC	LSJ



Legend

- Red Line Boundary
- Artificial Unvegetated, Unsealed Surface
- Developed Land; Sealed Surface
- Modified Grassland
- Proposed Small Tree



CLIENT:	Ben Paterson		
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DRAWING:	Proposed Habitats		1:800
NUMBER:	8756-XX-E0-02		A4
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