



BIODIVERSITY NET GAIN (BNG)

Land South Of Park Street

DOCUMENT PRODUCTION RECORD	
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Non-technical Executive Summary

EXECUTIVE SUMMARY

This report has been compiled to support the proposals comprising the erection of nine dwellings and associated works (including landscaped open space proposals) on Land South of Park Street, Heytesbury, Warminster BA12 0AF (The grid reference for the proposal is ST92884251, totalling 0.4921 ha). The assessment also included a parcel of land within the same ownership immediately surrounding the redline boundary on the north, south and west (the grid reference for the blueline land is ST92874254, totalling 1.1 ha). It can be confirmed that if planning permission is granted, the proposed development would be subject to the Biodiversity Net Gain Condition.

This Biodiversity Net Gain Assessment, Arboricultural Impact Assessment & Tree Protection Plan¹ and Preliminary Ecological Appraisal² (the latter is outlined in a separate report, produced by BN Ecology, which should be read in conjunction with the Biodiversity Net Gain Assessment) shows how both the Biodiversity Gain Hierarchy and the Mitigation Hierarchy have been followed. This report also illustrates how the development proposals will secure 10% biodiversity net gain in accordance with the Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021).

As indicated above, this assessment should be read in conjunction with the Preliminary Ecological Appraisal, as well as Statutory Metric and completed Habitat Condition Sheets, which have been prepared by BN Ecology.

This report demonstrates that the proposed development will deliver a minimum 10% Biodiversity Net Gain (BNG). The scheme will achieve

- **+23.63%** Biodiversity Net Gain in Area Units (+0.25 units)
- **+173.76%** Biodiversity Net Gain in Linear Hedgerow Units (+0.33 units)

These gains will be delivered through on-site enhancement measures, including:

Retention proposals:

- Retaining 0.010697ha of g4 – Grassland – Modified Grassland, remaining in 'poor' condition
- Retaining 0.0071ha of u1b – Urban – Developed Land, comprising a cesspit to be replaced with a septic tank

Creation proposals:

- The creation of 0.018925ha of g3c – Grassland – Other Neutral Grassland, targeting 'Poor' condition
- The creation of 0.061192ha of g3c – Grassland – Other Neutral Grassland, targeting 'Good' condition

¹ Baxter, N (November 2025). Arboricultural Impact Assessment & Tree Protection Plan For trees on land at Park Street in Heytesbury. NBTREEMANAGEMENT: Shaftesbury.

² Rice, E (04/01/2026). Land South of Park Street, BA12 0AF, Preliminary Ecological Appraisal (PEA). Bristol.

- The creation of 22 no. 32 – Individual Trees – Rural Trees (scattered), targeting 'moderate' condition.
- The creation of h2a5 – Hedgerow - Species-rich Native Hedgerow, Medium Distinctiveness, Targeting 'Poor' Condition, 0.035km
- The creation of h2a5 – Hedgerow - Species-rich Native Hedgerow, Medium Distinctiveness, Targeting 'Poor' Condition, 0.082km
- The creation of 33 – Line of Trees, Low Distinctiveness, Targeting 'Poor' Condition, 0.02km
- The creation of Line of Trees, Low Distinctiveness, Targeting 'Poor' Condition, 0.017km

Therefore, it is deemed that enough information has been provided to the Local Planning Authority to establish with sufficient certainty that, if planning permission was granted, the applicant is capable of discharging the biodiversity gain condition and thus achieving their biodiversity gain objective.

Baseline Habitat Map (UKHab) (Figure 1)



Pre-development Baseline Habitat Plan

- Redline
- Blueline
- g4 - Modified Grassland
- u1f - Sparsely Vegetated
- u1b - Developed Land - Sealed Surface
- 33 - Line of Trees
- 32 - Individual Trees - Rural Trees
- (Blueline) h3d - Bramble Scrub

Project: Land South Of Park Street

Date of Survey: 29/01/2026

Location: Heytesbury, Warminster, BA12 0AF

Scale: 1:1,000

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Post-intervention Habitat Map (UKHab) (Figure 2)



Post-intervention Proposed Habitat Plan

- Redline
- Blue line
- g4 - Modified Grassland
- u1b 5 - Developed Land - Sealed Surface; Buildings
- u1f - Sparsely Vegetated
- u1b - Developed Land - Sealed Surface
- 828 - Vegetated Garden
- g3c - Other Neutral Grassland targeting 'poor' condition
- 89 - Other Green Roof
- g3c - Other Neutral Grassland targeting 'good' condition
- 847 - Introduced Shrub
- 33 - Line of Trees
- h2a5 - Species-rich Native Hedgerow targeting 'poor' condition
- 32 - Individual Trees - Rural Trees
- Hedgerow in Private Curtilage
- Trees in Private Curtilage
- (Blue line) h3d - Bramble Scrub

Project: Land South Of Park Street
Location: Heytesbury, Warminster, BA12 0AF



Scale: 1:1,000

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1.Introduction, Background and Project Details

- 1.1. This report has been compiled to support a proposal comprising the erection of nine dwellings and associated works on Land South of Park Street, Heytesbury, Warminster BA12 0AF delineated as the 'redline boundary', totalling 0.4921 ha. The grid reference for the redline boundary site is ST92864252.
- 1.2. The Biodiversity Net Gain Assessment has been carried out by BN Ecology to assess the ecological baseline of the site to enable completion of the Statutory Biodiversity Metric.

Table 1. – Site Specific Information	
Category	Site Specific Information
Site Name	Land South of Park Street
Site Location	Land South of Park Street, Heytesbury, Warminster, BA12 0AF
OS GRID REFERENCE & SCALE	Grid reference: ST 9286 4252 Please refer to Standalone Plans for Scale
Local Authority	Wiltshire Council
Overall Site Area (Redline)	0.4921 ha
Overall Site Area (Blueline)	1.1 ha
Existing Land Use (Redline)	Agricultural
Existing Land Use (Blueline)	Agricultural
Proposed Land Use (Redline)	Residential and Landscaped Open Space
Proposed Land Use (Blueline)	Agricultural

2. Methodology

HABITAT CLASSIFICATION AND CONDITION ASSESSMENT	During the survey, UK Habitat Classification survey techniques (UKHab Ltd, 2023) were utilised by the surveyor when mapping all habitat types within the Site. A condition assessment of the habitats was undertaken by the surveyor where appropriate. The condition assessment was undertaken and supported by the Statutory Biodiversity Metric Condition Assessment sheet (DEFRA, July 2025) for each respective habitat type(s) that were present within the Site boundary.
BIODIVERSITY NET GAIN CALCULATIONS APPROACH	The latest version of the DEFRA Statutory Biodiversity Metric (DEFRA, July 2025) has been used to calculate the pre-development biodiversity unit baseline of the Site and the post-development value. The baseline habitat values are assessed in accordance with the above classification system. The report then assessed the baseline score value for the Site against that of the post-development score, the result of which shows (when compared) the overall change in biodiversity units for the development (displayed as a net positive, neutral, or negative figure).
HABITAT UNIT TYPES	The Statutory Biodiversity Metric displays and assesses the pre-development and post-development types based on three separate types of habitat, calculated as separate 'modules' in the calculations. The inclusion of these habitats are only recorded within the Biodiversity Net Gain Assessment report where they are existent within the pre-development baseline or are proposed as part of the Biodiversity Net Gain strategy to achieve 10% net gain post-development. The three separate modules are as follows: • Area Habitat Units – these are measured in hectares (ha), some examples of which include grassland, woodland, ponds and scrub. • Linear Hedgerow Units – These are measured in kilometres (km), some examples of which include treelines, hedgerows and hedgerows with associated ditches. • Linear Watercourse Units – these are measured in kilometres (km), some examples of which include rivers, streams and ditches.

BIODIVERSITY METRIC RULES	As detailed in the Statutory Biodiversity Metric User Guide (DEFRA, July 2025), the following rules must be followed: Table 1: Statutory Biodiversity Metric Rules (The Statutory Biodiversity Metric User Guide, July 2025) <table><tr><th>Rule</th><th>Rule detail</th></tr><tr><td>Rule 1</td><td>The trading rules of this biodiversity metric must be followed.</td></tr><tr><td>Rule 2</td><td>Biodiversity unit outputs, for each type of unit, must not be summed, traded, or converted between types. The requirement to deliver at least a 10% net gain applies to each type of unit.</td></tr><tr><td>Rule 3</td><td> To accurately apply the biodiversity metric formula, you must use the statutory biodiversity metric calculation tool or small sites biodiversity metric tool (SSM) for small sites. The tools remove the need for a user to manually calculate the change in biodiversity value. The tool will summarise the results of the calculation and inform a user whether the biodiversity net gain objective has been met. </td></tr><tr><td>Rule 4</td><td> In exceptional ecological circumstances, deviation from this biodiversity metric methodology may be permitted by the relevant planning authority. See more about applying rule 4 </td></tr></table>	Rule	Rule detail	Rule 1	The trading rules of this biodiversity metric must be followed.	Rule 2	Biodiversity unit outputs, for each type of unit, must not be summed, traded, or converted between types. The requirement to deliver at least a 10% net gain applies to each type of unit.	Rule 3	To accurately apply the biodiversity metric formula, you must use the statutory biodiversity metric calculation tool or small sites biodiversity metric tool (SSM) for small sites. The tools remove the need for a user to manually calculate the change in biodiversity value. The tool will summarise the results of the calculation and inform a user whether the biodiversity net gain objective has been met.	Rule 4	In exceptional ecological circumstances, deviation from this biodiversity metric methodology may be permitted by the relevant planning authority. See more about applying rule 4					
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ASSESSMENT METHODS FOR INDIVIDUAL TREES	'Individual trees' is defined as a broad habitat type in the metric, if present. For a habitat to meet this classification criterion, the tree (or group of individual trees) must have a diameter at breast height (DBH, measured in cm) greater than 7.5cm. The Statutory Biodiversity Metric User Guide (DEFRA, July 2024) provides clear guidelines on this, which are delineated below in Table 2: Table 2: Tree classes and the equivalent area (ha) that they represent (The Statutory Biodiversity Metric User Guide, July 2025) <table><tr><th>Size class</th><th>Diameter at breast height (cm)</th><th>Biodiversity metric area equivalent (ha)</th></tr><tr><td>Small</td><td>greater than 7.5cm and less than or equal to 30cm</td><td>0.0041</td></tr><tr><td>Medium</td><td>greater than 30cm and less than or equal to 60cm</td><td>0.0163</td></tr><tr><td>Large</td><td>greater than 60cm and less than or equal to 90cm</td><td>0.0366</td></tr><tr><td>Very large</td><td>greater than 90cm</td><td>0.0765</td></tr></table>	Size class	Diameter at breast height (cm)	Biodiversity metric area equivalent (ha)	Small	greater than 7.5cm and less than or equal to 30cm	0.0041	Medium	greater than 30cm and less than or equal to 60cm	0.0163	Large	greater than 60cm and less than or equal to 90cm	0.0366	Very large	greater than 90cm	0.0765
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Strategic Significance	The Statutory Biodiversity Metric puts consideration into the Strategic Significance of on-site habitat(s). Strategic Significance relates to a habitat's local significance in relation to its location and relationship with other local habitat features and/or species. The Statutory Biodiversity Metric allows the assessor to apply a Strategic Significance 'multiplier' on pre-development and post-development habitat baselines in															

accordance with criterion that must be met. This is delineated in Table 3 (DEFRA, July 2025).

Table 3: Statutory Biodiversity Metric Strategic Significance Categories, with appropriate descriptions and criteria where a Local Natural Recovery Strategy has been published (DEFRA, July 2025):

Category	Score	Description
High (Formally identified in local strategy)	1.15	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 You should record that you have applied the published LNRS in your gain plan.
Medium (Location ecologically desirable but not in local strategy)	1.10	This category cannot be applied.
Low (Area / compensation not in local strategy)	1	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.

The assessment has utilised data sources and resources to inform the Strategic Significance of the Site and its habitats within. The following resources have been utilised:

- Multi-Agency Geographic Information for the Countryside (MAGIC)
- Relevant published Local Nature Recovery Strategy (LNRS), where available
- Environmental Local Record Centre data sources, if appropriate to obtain such data
- The Natural England³ and Joint Nature Conservancy Council⁴ websites were visited to obtain citation details of the statutory designated sites

³ <https://designatedsites.naturalengland.org.uk/>

⁴ <http://jncc.defra.gov.uk/page-2>

- Ordnance Survey maps and aerial images, including google maps

Table 4: Statutory Biodiversity Metric Strategic Significance Categories, with appropriate descriptions and criteria where a Local Natural Recovery Strategy has not been published (DEFRA, July 2025):

Category	Score	Description
High (Formally identified in local strategy)	1.15	The habitat type is mapped and described as locally ecologically important within a specific location, within documents specified by the relevant planning authority. If your project delivers the mapped habitat creation or enhancement actions set out within specified alternative documents, or enhances an existing habitat identified within specified alternative documents as locally ecologically important, strategic significance can be recorded as high in the post-intervention sheets. If the specified alternative documents identify existing habitat as locally ecologically important within a specified location, strategic significance may be recorded as high in the baseline. You should record the name of the plan the relevant planning authority has specified in the user comments and record that you have used the specified document in your gain plan.
Medium (Location ecologically desirable but not in local strategy)	1.10	This category can be applied when the LPA has not identified a suitable document for assessing strategic significance. Users should: • explain how the habitat type is ecologically important within a specific location • demonstrate the importance of that habitat in providing ecological linkage to other strategically significant locations • use professional judgement When the above criteria are met, strategic significance may be recorded as medium in the baseline and post-intervention sheets.
Low (Area / compensation not in local strategy)	1	Where the definitions for high or medium strategic significance are not met.

Additional Notes and Limitations

Please Note: Treatment of pre-development and post-development existing hedgerows:

Line of trees L1 currently extends for approximately 0.048 km. A short section of approximately 11 m will be removed or significantly reduced in width to accommodate the proposed access & visibility splay.

As the proposed access road will physically sever L1, the Hedgerow Survey Handbook requires the affected lengths to be recorded post-intervention as separate lined of trees features. In accordance with the Statutory Biodiversity Metric guidance, where the condition or continuity of retained habitat cannot be confidently maintained over the project timeframe, such habitat should be recorded as lost.

Although only a small section (approximately 11 m) of the hedgerow will be permanently removed or reduced to incorporate visibility splays, BN Ecology considers it appropriate to apply the Statutory Biodiversity Metric approach whereby the retained sections are treated as newly created habitat of the same type. The guidance advises that habitats created in advance should typically be assigned a lower starting condition and assessed using the "habitat created in advance" function over a 30-year (or greater) management period. The Statutory Biodiversity Metric guidance typically requires habitats created in advance to target a lower condition, and as a precautionary measure (though, this is not expected), the post-intervention treelines condition has been reduced to 'poor'.

In line with the metric guidance, the post-intervention severed treeline (currently L1, but in the proposals the two separate lengths are L2 & L3) has been treated as separate habitat units, and the "habitat created in advance" function has been applied as the most appropriate and precautionary approach.

Defining L1 – Line of Trees

A line of tree's, as part of the UKHab definition states that the width should not exceed 5m. However, there are two minor areas along this line which slightly exceed this width, extending to 7.5m in width.

The UKHab guidance is explicit in its approach to spatial feature types. It states that each habitat is assigned a default spatial representation, typically area or line — and where one of these is not listed, it should only be used in exceptional circumstances, with clear justification provided. The use of point features is intended for habitats that are inherently discrete and frequently recorded in this way, such as individual trees.

While most habitats can technically be represented as points where a feature is too small to map as a polygon or linear feature, this approach results in a significant loss of ecological and spatial information. The guidance is clear that point data should not be used as a substitute for area or line mapping where these are appropriate.

In this instance, the habitat (L1) is best represented as a linear feature, as this reflects its true form, extent and ecological function. Mapping it as a line accords with the UKHab spatial hierarchy, retains the maximum amount of ecological information, and avoids the unnecessary downgrading of the feature to a point.

Please note: Statutory Biodiversity Metric

Table F of the Statutory Biodiversity Metric summarises common issues and any actions required to resolve these.

One of the most commonly occurring issues is that the metric assigns a unit value to the closest two decimal places, which can result in a 0.01 unit discrepancy, as the 'true' unit values are used to calculate the end values and then rounded to the two decimal places.

It should be noted concerning the creation of vegetated garden that, whilst created habitats cannot be recorded within the private curtilages of garden, the proposals recommend incorporating species rich native hedgerow; native tree planting (such as native fruiting trees, or other trees of native stock as outlined above); and high nectar producing shrub species.

It should also be noted that whilst biodiversity measures that provide species specific enhancements are not measurable in unit value in the metric calculations, the proposals also recommend incorporating bird & bat boxes, bee bricks and ensuring that any new fencing incorporates accessible hedgehog holes.

Strategic Significant Habitat Exclusions

Other Neutral Grassland (TN5) and Hedgerows (H1 & H2) have not been classed as 'high' strategic significance, due to their targeted conditions not exceeding 'poor'.

3. Key Information Checklist Requirements

CONFIRMATION THAT THE DEVELOPMENT PROPOSAL SHOULD OR SHOULD NOT BE SUBJECT TO BNG.	Yes, the development proposal should be subject to Biodiversity Net Gain.
CONFIRMATION THAT THE APPROPRIATE METRIC VERSION HAS BEEN USED.	Statutory Biodiversity Metric (July 2025).
IS AN ALTERNATIVE DATE BEING USED TO CALCULATE THE BIODIVERSITY BASELINE VALUE OF THE SITE?	No, an alternative date is not being used.
HAS THERE BEEN ANY UNAUTHORISED HABITAT DEGRADATION SINCE THE 30th OF JANUARY 2020?	No, no habitat degradation has occurred since 30 th of January 2020.
IS THERE ANY ON-SITE IRREPLACEABLE HABITAT	No, no Irreplaceable habitat was recorded on-site.

PRE-DEVELOPMENT BASELINE ON-SITE BIODIVERSITY VALUE

The habitats recorded within the Site are described in detail below with the appropriate condition assessment results justifying their condition classifications. A DAFOR (Dominant, abundant, frequent, occasional and rare) scale has been applied to the species recorded in each habitat type.

Only habitats which fall under the 'Area Unit' and 'Linear Hedgerow Units' categories are present within the Site. No habitats which fall under the 'Watercourse Units' categories are present, and subsequently, an assessment of these features was not required.

The habitats areas within the Site comprise of four habitat types;

- Grassland - Modified Grassland, (g4)
- Sparsely Vegetated Land, (u1f)
- Line of Trees, (33)
- Individual Trees – Rural Trees, (32)

Redline

g4 – Grassland - Modified Grassland, 0.475 ha, TN1, Poor Condition, Low Distinctiveness

The central and predominant habitat within the site comprises g4 – Modified Grassland. The field is not currently subject to grazing; however, it has historically been grazed for a prolonged period. The ground surface is uneven, likely reflecting previous grazing pressure and localised disturbance. Following recent heavy rainfall, localised areas of temporary standing water were observed across the site.

Sward height across the site is variable, ranging from approximately 5cm to up to 60cm in taller sections. The taller vegetation is characterised by stands of 16 – Tall Forbs, including common dock and common nettle. The grassland is species-poor, with limited herbaceous diversity and an average recorded species richness of approximately four species per m².

Average Species-richness: 4 per meter²

Species	Quadrat 1	Quadrat 2	Quadrat 3	Quadrat 4	Quadrat 5
Common nettle	R	-	-	-	-
Cock's-foot	D	A	D	A	F
Common dock	-	R	-	R	-
Creeping buttercup	-	F	-	O	-
False oat grass	-	O	-	-	-
Narrow leaved ribwort plantain	-	-	-	A	-
Oxeye daisy	-	-	-	-	O
Perennial rye grass	-	-	-	-	F
Common dandelion	-	-	-	R	-
Germander speedwell	-	-	-	-	R
Dove's-foot crane's bill	-	-	-	-	R

33 - Line of Trees, 0.048 km, L1, Moderate Condition, Low Distinctiveness

Along the northern boundary of the site, a tree line forms a natural buffer between TN1 and Park Street. Immediately to the south of this tree line, an old brick wall covered in ivy runs parallel to it, creating a clear division between the treeline edge and the open grassland beyond. The tree line is composed of sycamore, ash, occasional *Prunus* spp. and *Poplar* spp., with a rare occurrence of horse chestnut. The majority of trees within the line of trees fall within the 'medium' to 'large' size classes, with most trunks heavily covered in ivy.

U1f – Urban - Sparsely Vegetated, 0.01 ha, TN2, Moderate Condition, Low Distinctiveness

The understory to the tree line is largely dominated by common ivy, with occasional occurrences of snowdrops. A considerable volume of deadwood and leaf litter is present on the ground beneath the canopy. There is also evidence of human disturbance, most notably litter likely discarded by passers-by from the adjacent road.

32 – Individual Trees – Rural Trees, T1 (T8 in arb plan by NB Tree Management), Good Condition, Medium Distinctiveness

T1 is a hawthorn tree in the 'small' size class. T1 is situated immediately to the south of the brick wall, which forms a boundary between the TN1 grassland and the L1 treeline.

U1b – Urban – Developed Land, 0.0071 ha, ST, Very Low Distinctiveness

A former cesspit, now largely overgrown with grassland species, is proposed to be converted into a new septic tank.

Blueline Boundary Habitats include:

- Grassland – Modified Grassland, (g4)
- Bramble Scrub, (h3d)
- Sparsely Vegetated, (u1f)
- Line of Trees, (33)
- Individual Trees, (32)

g4 – Grassland - Modified Grassland, Poor Condition, Low Distinctiveness

TN1 extends into the blue line boundary, where ground levels decrease slightly towards the River Wylfe, and a greater extent of standing water was present at the time of survey.

h3d – Heathland and Shrub - Bramble Scrub, Medium Distinctiveness

Two areas of bramble scrub are present along the fence line in the south-western corner of the blue line boundary. These areas are limited in extent and relatively isolated; however, they provide a small degree of structural diversity within the site, offering potential refuge, as well as localised foraging opportunities.

32 – Individual Trees – Rural Trees, Moderate Condition, Medium Distinctiveness

T2 is situated along the western boundary of the site and comprises a 'small' size class ash. Adjacent to this tree, vegetation from the neighbouring property extends over the fence line and encroaches into the site.

33 - Line of Trees, Moderate Condition, Low Distinctiveness

A continuation of the line of trees within the redline boundary.

u1f – Sparsely Vegetated, Moderate Condition, Low Distinctiveness

A continuation of the sparsely vegetated land within the redline boundary.

BASELINE BIODIVERSITY VALUE (ON-SITE)

BASELINE ON-SITE AREA UNITS

1.04 Area Units

BASELINE ON-SITE AREA HABITAT

Habitat on-site comprises;

- TN1, g4 – Grassland - Modified Grassland, 0.475 ha, Poor Condition, Low Distinctiveness | 0.95 Units
- TN2, u1f – Urban - Sparsely Vegetated, 0.01 ha, Moderate Condition, Low Distinctiveness | 0.04 Units
- ST, u1b – Urban - Developed Land, 0.0071 ha | 0.00 units
- T1, 32 – Individual Trees – Rural Trees, (T8 in arb plan by NB Tree Management), Good Condition, Medium Distinctiveness | 0.05 Units

BASELINE ON-SITE HEDGEROW HABITAT	L1, 33 - Line of Trees, 0.048 km, Moderate Condition, Low Distinctiveness 0.19 Units
BASELINE ON-SITE WATERCOURSE	N/A – No watercourses lie within the site boundary, and none are located within 10m (from the top of the river bank) of the site boundary.

POST-INTERVENTION BASELINE BIODIVERSITY VALUE (ON-SITE)	
POST-INTERVENTION ON-SITE AREA UNITS	1.28 Area Units
POST-INTERVENTION ON-SITE AREA HABITAT	Retention proposals: - TN1, g4 – Grassland – Modified Grassland, 'Poor' Condition, Low Distinctiveness 0.010697ha 0.02 units – retained as a field access for the client, allowing access into their retained blue line boundary land which will remain unaffected, and has thus been marked under the retention proposals. - ST, u1b – Urban – Developed Land, Very Low Distinctiveness 0.0071 ha 0.00 units, comprising a cesspit to be replaced with a septic tank Creation proposals: - TN3, u1b – Urban - Developed land; sealed surface, Very Low Distinctiveness 0.245712ha 0.00 units – all proposed hardstanding areas. - TN4, 828 – Urban – Vegetated Garden, Low Distinctiveness 0.137877ha 0.27 units – allocated private residential gardens. - TN5, g3c – Grassland – Other Neutral Grassland, Medium Distinctiveness, Targeting 'Poor' Condition 0.018925ha 0.07 units – small areas of other neutral grassland outside of private residential curtilage, allocated as landscaped open space. - TN6, 89 – Urban – Other Green Roof, Low Distinctiveness 0.007499ha 0.01 units – Sedum blanket green roof which will be situated on top of the proposed garage carparking port - T3, 32 – Individual Trees – Rural Trees, Medium Distinctiveness, Targeting 'Moderate' Condition 22 no. Individual Native Trees 0.32 units – trees shall be native stock & locally sources, and planted within areas allocated as landscaped open space, outside of residential curtilage. - TN7, g3c – Grassland – Other Neutral Grassland, Medium Distinctiveness, Targeting 'Good' Condition 0.061192ha 0.59 units – An extensive area that shall be secluded from the 'built' development along the southern boundary extending east to west, which can feasibly achieve 'Good' condition subject to appropriate management activities being secured for a period minimum of 30-years. - TN8 847 – Urban – Introduced Shrub, Low Distinctiveness 0.003098ha 0.01 Units – two linear, low maintenance shrub patches situated on either side of the proposed access verges to be planted with undetermined shrub species.

	Please refer to the 'Detailed Results' page in the Statutory Biodiversity Metric. Overall, total grassland retention and creation values will be 0.68 Area Units; the total Individual Tree values will be 0.32 Area Units; and the total Urban values will be 0.29 Units
POST-INTERVENTION ON-SITE LINEAR HEDGEROW UNITS	0.53 Linear Hedgerow Units
POST-INTERVENTION ON-SITE LINEAR HABITAT	Creation proposals: • H1, h2a5 – Hedgerow - Species-rich Native Hedgerow, Medium Distinctiveness, Targeting 'Poor' Condition 0.035km 0.14 Units – Extending a long part of the southern boundary of the site, allocated within landscaped open space. The hedgerow shall be managed to ensure the width and height does not extent beyond 1.5m, to ensure overshading of the grassland targeting 'good' condition does not occur. • H2, h2a5 – Hedgerow - Species-rich Native Hedgerow, Medium Distinctiveness, Targeting 'Poor' Condition 0.082km 0.32 Units – Extending a long part of the southern boundary of the site, allocated within landscaped open space. The hedgerow shall be managed to ensure the width and height does not extend beyond 1.5m, to ensure overshading of the grassland targeting 'good' condition does not occur. Creation proposals (Creation in advance, 30+ years – previously L1) : • L2, 33 – Line of Trees, Low Distinctiveness, Targeting 'Poor' Condition 0.02km 0.04 Units – existing northern line of trees (currently in 'moderate condition') being retained but targeting a lower condition (see 'additional notes' section above for details) • L3, 33 – Line of Trees, Low Distinctiveness, Targeting 'Poor' Condition 0.017km 0.03 Units – existing northern line of trees (currently in 'moderate condition') being retained but targeting a lower condition (see 'additional notes' section above for details) Please note that L2 and L3 have been assessed as separate habitat units due to their physical severance by the proposed access road. Although they technically comprise retained sections of L1, the 'habitat created in advance' function has been applied, as this is considered the most appropriate approach in this instance.
POST-INTERVENTION ON-SITE WATERCOURSE	N/A
Gain/Loss	+ 23.63% (+0.25 Area Units); +173.76% (+0.33 Linear Hedgerow Units)

4. BNG Strategy

BNG Mitigation Hierarchy	Planning policy makes it clear that any proposed development duly considers and applies the below Mitigation Hierarchy when considering impacts to ecological species and habitats: • Avoidance: every attempt should be made to avoid creating impacts on features from the outset; • Minimisation: where avoidance cannot be wholly achieved, measures by design, suitably designed methods of working or other actions to minimise impacts (otherwise known as mitigation) should be employed; • Compensation/restoration: if avoidance and minimisation cannot be wholly achieved, significant impacts on features should be compensated in such a way to restore an area to its original ecosystem or any other ecological functions/services that existed prior to impacts relating to the development. The hierarchy requires that avoidance is applied where possible. When it is not feasible to avoid such impacts, rationale for minimisation/compensation/restoration should be sufficiently detailed, showing the measures are feasible to implement. The ecological constraints associated with the development have been assessed in accordance with the Mitigation Hierarchy, with due consideration to apply, as much as possible, actions to avoid impacts on ecological features. In addition to the above, Section 40 of the Natural Environment and Rural Communities Act 2006 states that <i>'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'</i> as well as <i>'Conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'</i>.
HOW HAVE THE PROPOSALS MINIMISED BIODIVERSITY IMPACTS	All potential ecological constraints in relation to the developments proposals have been thoroughly considered in the separate Preliminary Ecological Appraisal, undertaken by BN Ecology. Opportunities to deliver ecological enhancement in accordance with local and national planning policy have also been considered and are outlined in the Preliminary Ecological Appraisal.

Steps proposed to minimise adverse impacts and to deliver net gain include:

- Allocating over 16% (excluding creation of introduced shrub, vegetated gardens and other green roof) of the Sites redline boundary for on-site habitat enhancement & creation (see above for details).
- Recommending that the created vegetated gardens incorporate hedgerows that are species rich native hedgerow (h2a5) and comprise of the following: common dogwood, hazel, hawthorn, spindle, and guelder rose .
- Recommending that any new shrubs be high nectar producing to encourage invertebrates to the Site, as well as providing continued foraging for bats. The Royal Horticultural Society guide, "RHS Perfect for Pollinators, www.rhs.org.uk/perfectforpollinators" provides a well-suited plants list of both native and non-native species. In addition, it's been recommended that all new trees planted on-site should be from local, native stock, such as field maple, ash, hornbeam, beech, and spindle.
- Ensuring that habitats proposed to be lost are of low biodiversity and ecological value. The habitats to be lost are predominantly 'low' distinctiveness habitats. Where 'Medium' distinctiveness habitats are being lost, these losses have been limited as much as possible, and only result in the loss of one no, individual tree which is 'small' in size class, and thus feasible to compensate.
- All tree's associated with L1 that are proposed to be removed have been classed under BS 5837 Categories as 'C' (informing these trees (four in total) to be of 'low quality') and 'U' (informing this tree (one in total) to be of 'Very Poor' quality) by NB Tree Management Arboricultural Consultancy. These trees have been carefully selected, ensuring the poorest quality specimens are removed.

The proposed development has also been recommended to provide additional enhancement for species likely to already utilise the Site and associated boundaries, including:

- It has been recommended that consideration is given to any proposed on-site hedgerow creation. Species composition of new hedgerow(s) should be planted with native species comprised of the following: common dogwood, hazel, hawthorn, spindle, and guelder rose.
- It has been recommended that a Habitat 001 bat box or similar is built into each dwelling at least four metres above ground level and away from windows of the west or south facing elevation.

	• It has been recommended that any new shrubs incorporated within the Site boundary should be high nectar producing to encourage invertebrates to the Site, as well as provide continued foraging for bats. The Royal Horticultural Society guide, "RHS Perfect for Pollinators, www.rhs.org.uk/perfectforpollinators" provides a well-suited plants list of both native and non-native species. In addition, all new trees planted on site should ideally be from local native stock, such as common crab apple, whitebeam and common hazel . • It has been recommended that a Vivra Pro Woodstone House Martin nest or similar is mounted directly under the eaves of the north elevations on each of the dwellings. • A bee brick has been recommended to be built into the walls about 1 metre above ground level on the south or southeast elevations on each of the dwellings. • It has been recommended that new fencing incorporates accessible hedgehog holes, measuring 13cm x 13cm to allow the movement of hedgehogs into and out of the Site. It should also be noted that the Preliminary Ecological Appraisal also delineated considerations for the following protected species or notable features: • Above ground nesting birds • Foraging and commuting habitats for bats • Terrestrial badger activity • The habitat suitability for amphibians during terrestrial phases • Suitability for hazel dormouse • The habitat suitability for reptiles during terrestrial phases • Terrestrial habitat potential for hedgehog • Terrestrial habitat potential for brown hare • Terrestrial and riparian habitat suitability for otter and water vole • Root Protection Zones for retained trees • Potential impacts on statutory designated and non-statutory site's It should be highlighted that biodiversity measures that provide species specific enhancements are not a measure that can be considered in the metric calculations.
WHAT IS THE PROPOSED STRATEGY TO FULFIL THE BIODIVERSITY GAIN OBJECTIVE?	The BNG Strategy does not require the purchase of off-site units or statutory credits. To offset, compensate and achieve mandatory 10% Biodiversity Net Gain in accordance with Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021), on-site

creation of habitat within areas allocated as landscaped open space outside of private residential curtilage, is proposed.

A Landscape Ecological & Environmental Management Plan or Habitat Management & Monitoring Plan (HMMP) will be prepared, which shall delineate a suitable approach to manage, maintain and monitor the habitats created on-site and off-site.

4.1 On-site Proposals

PROPOSED ON-SITE APPROACH

Please refer to section 'BASELINE BIODIVERSITY VALUE (ON-SITE)' for the existing on-site Area Habitats that will accommodate the proposed created habitats and 'POST-INTERVENTION BASELINE BIODIVERSITY VALUE (ON-SITE)' for the areas pertaining to habitat creation, enhancement and retention.

The proposals comprise:

Retention proposals (Area Units):

- TN1, g4 – Grassland – Modified Grassland, Low Distinctiveness
- ST, u1b – Urban – Developed Land, Very Low Distinctiveness

Creation proposals (Area Units):

- TN3, u1b – Urban - Developed land; sealed surface, Very Low Distinctiveness
- TN4, 828 – Urban – Vegetated Garden, Low Distinctiveness
- TN5, g3c – Grassland – Other Neutral Grassland, Medium Distinctiveness, Targeting 'Poor' Condition
- TN6, 89 – Urban – Other Green Roof, Low Distinctiveness
- T2, 32 – Individual Trees – Rural Trees, Medium Distinctiveness, Targeting 'Moderate' Condition (22 in total)
- TN7, g3c – Grassland – Other Neutral Grassland, Medium Distinctiveness, Targeting 'Good' Condition
- TN8 847 – Urban – Introduced Shrub, Low Distinctiveness

Creation proposals (Linear Units):

- H1, h2a5 – Hedgerow - Species-rich Native Hedgerow, Medium Distinctiveness, Targeting 'Poor' Condition
- H2, h2a5 – Hedgerow - Species-rich Native Hedgerow, Medium Distinctiveness, Targeting 'Poor' Condition

Creation proposals (Creation in advance, 30+ years – previously L1, Linear Units):

- L2, 33 – Line of Trees, Low Distinctiveness, Targeting 'Poor' Condition
- L3, 33 – Line of Trees, Low Distinctiveness, Targeting 'Poor' Condition

The following have been taken into consideration, and prescriptions proposed.

Creation of Other Neutral Grassland (TN5 & TN7) targeting 'poor' & 'good' condition.

Soilscape (LandIS) indicates that the Site sits within an area of freely draining lime-rich loamy soils with lime-rich fertility. Therefore, the following grassland on-site seed mixes have been considered:

- **EM5 Meadow Mixture for Loamy Soils.** This seed mix comprises of species that are adapted to growing on soils which have clayey and lime content composition. The supplier of this mix is Emorsgate Seeds.

Soilscape 5:

Freely draining lime-rich loamy soils

Texture:

Loamy

Coverage:

England: 3.7%, Wales: 0.0%, England & Wales: 3.2%

Drainage:

Freely draining



Fertility:

Lime-rich



Taking the above into consideration, a locally sourced seed mix such as EM5 (supplied by Emorsgate Seeds) is an examples of possible seed mixtures that could be incorporated. These seed mixes are suited to soils compositions as indicated by Soilscape, making them favourable choices for the on-site proposals for landscaped open space.

The parcel of land proposed to enhance and create other neutral grassland may need to be stock fenced to prevent damage from future residents and grazing wildlife. Such preventative measures will allow young seedlings to germinate, flower, produce seeds and repeat the process year on year, thus increasing the concentration, abundance and diversity of the habitat. Some human intervention (especially in the first few years) may be required to over-seed the areas where bare ground is increasing, with locally sourced, species

rich seed mix to assist and aid the growth and species diversity.

Creation of 22 no. tree's (T3) targeting 'moderate' condition

Examples of species being considered which are tolerant of the indicated soil conditions (see above) include common crab apple, whitebeam and common hazel. These particular species have been chosen because they are also considered small UK native stock, with a limited crown spread and thus suitable for this site to ensure proposed other neutral grassland does not get overshadowed by tree crowns.

The planted trees may need to be stock fenced to prevent damage from wildlife. Such preventative measures will ensure damage to the tree is minimal, to ensure it grows healthily. Some human intervention (especially in the first few years) may be required to prune and water the tree, especially in periods of excessively dry weather.

Creation of species-rich native hedgerow (H1 & H2) targeting 'poor' condition

Examples of species being considered which are tolerant of the indicated soil conditions (see above) include common dogwood, hazel, hawthorn, spindle, and guelder rose.

The months to plant hedgerow are in the autumn and winter months, particularly between November and March, although planting should be avoided in especially cold or windy weather and never if the soil is frozen or waterlogged.

The above methods represent an example of how contributing to achieve Biodiversity Net Gain can be achieved, in part, on-site. The Landscape Ecological Management Plan or Habitat Maintenance and Monitoring Plan (HMMMP) will provide the particular details required in relation to the necessary management activities relating to duration, inspection practices, timings of activities and whom will be the competent responsible personnel. It is anticipated that this will be secured by way of a planning obligation, such as a Condition or Section 106 agreement.

Table 5. Discussion points on how Biodiversity Net Gain Good Practice Principles have been applied to enable the project's biodiversity incorporation and lifespan.

BNG Principle	Indicators	Project comments
Principle 1. Apply the Mitigation Hierarchy	Measures to avoid and minimise biodiversity loss and to rehabilitate/restore biodiversity affected by the project are: 1) Specified and recorded, 2) Implemented and monitored, 3) Managed for the longevity of the project and to mitigate impacts of losses impacts.	Losses are mainly limited to habitats of 'low' distinctiveness. Where losses of 'medium' distinctiveness habitats are being lost, these are limited as far as possible, and will only result in the loss of one no. individual tree, which is 'small' in size class and thus feasible to compensate All on-site important intrinsic features are being retained as far as possible. Whilst 11m of the total 48m length concerning the line of trees is being removed or significantly reduced to facilitate visibility splays, NB Tree Management Arboricultural Consultancy have ensured that associated trees to be lost are of 'low' or 'very low' quality in accordance with BS 5837 Categories. Therefore, losses have been minimised as far as possible on this feature, and only focus on poor quality tree specimens (which also includes individual tree T1). Due to the size of the scheme, an option consideration report is not considered appropriate. On-site avoidance, mitigation and, where necessary, compensation measures for

			protected species and habitats have been considered along with species-specific enhancements, in accordance with the Local and National Planning Policies. A separate Preliminary Ecological Appraisal has been undertaken by BN Ecology. Mitigation and compensatory measures are recommended to be incorporated into the proposed Site Plan (as well as through a financial contribution to Wiltshire's District Level Licensing Scheme pertaining to anticipated impacts on great crested newts) in accordance with the survey findings. However, these are not expected to change the on-site proposals pertaining to achieving & fulfilling the Biodiversity Gain Objective.	
	Principle 2. Avoid losing biodiversity that cannot be offset by gains elsewhere	This part discusses impacts on irreplaceable habitats and other vulnerable biodiversity resources. These are habitats where their losses cannot be replaced within a reasonable timescale and therefore require bespoke compensatory measures.	There are no habitat losses on-site that cannot be readily offset and compensated on-site and off-site, which shall be achieved through the proposals pertaining to habitat creation.	
	Principle 3. Be inclusive and equitable	This principle discusses how stakeholders should be engaged with early in the project, and if feasible involve them in designing, implementing, monitoring and evaluating the approach to Biodiversity Net Gain. Achieving this in partnership with stakeholders is advised to be done where possible.	The local authority will be consulted, and engagement with the Local Planning Authority in relation to advice and guidance shall be sought. Where appropriate, BN Ecology has duly considered local planning Biodiversity Net Gain Principles. Additionally, BN Ecology's separate Preliminary Ecological Appraisal has considered Local	

			policies pertaining to Biodiversity and the Environment.	
	Principle 4. Address risks	Here, it should be considered how Biodiversity Net Gain is being achieved concerning the project. If there is any uncertainty in the implementation or design, these should be documented. If there are any risks associated with the project within the 30-year timeframe, particularly in relation to management, these should be highlighted and contingencies put in place.	This report outlines how BNG will be achieved on-site A Landscape Ecological & Environmental Management Plan or Habitat Management & Monitoring Plan (HMMP) will outline risks and associated timescales, which will, in turn, inform any contingency measures that may need to be in place.	
	Principle 5. Make a measurable net gain	It is described that a suitable metric calculator is used so that all habitat impacts are quantified in relation to the pre-development baseline and post-development baseline. Any gains associated with the post-development baseline are also quantified in relation to the anticipated condition compared to what the condition of such habitats would otherwise be without any creation, enhancement or management activities.	It is recommended that the Statutory Metric and supporting Condition Assessment Sheets are read conjunction with this report.	
	Principle 6. Achieve the best outcomes for biodiversity	This discusses ways in which evidence should be presented on how Biodiversity Net Gain commitments contribute (both now as well as in the future) to regional or national conservation goals. Evidence should be provided where it is possible to contribute to	The project will result in the loss of low quality and poorly managed (currently grazed modified grassland) habitats that are commonly found in similar settings across England with little ecological interest. Species specific enhancements are incorporated on-site and below considers local principles	

		priority species populations.	and the Biodiversity Gain Hierarchy Order.
	Principle 7. Be additional	Evidence is provided that conservation gains were a causation by the project specifically and would otherwise not have resulted in the same outcomes without such interventions.	Under the proposed scheme for on-site habitat creation, the interventions, which will be fully delineated in a Landscape Ecological & Environmental Management Plan or Habitat Management & Monitoring Plan (HMMP), will demonstrate how objectives and targets will be achieved as a result of the proposals.
	Principle 8. Create a Net Gain legacy	The provision of evidence should be shown that those who are responsible for implementing the project have the necessary and required technical knowledge and capacity to undertake the specific roles.	The Landscape Ecological & Environmental Management Plan or Habitat Management & Monitoring Plan (HMMP) will expand on the roles and responsibilities for the project. It is anticipated that the client will employ a suitably qualified person to undertake these activities (though, the habitat creation proposals in accordance with the Statutory Biodiversity Metrics automated 'difficulty multiplier' principle states that they are all of 'low' difficulty to create, meaning it is reasonable to assume that the client can manage them), therefore there is no reason to believe that the client will not have the technical resource and capacity to perform the necessary activities.
	Principle 9. Optimise sustainability	Evidence provided that the project takes BNG targets and priority objectives into consideration. It also aims to seek opportunities for gains for the wider environment, the community and the economy.	Given the scale of the project, it is not proportionate to focus these proposals on how the project will achieve gains for the wider environment. However, evidence is demonstrated in the Biodiversity Net Gain report that the Biodiversity Net Gain Good Practice Principles, relevant local Biodiversity Net Gain Principles, the Mitigation Hierarchy and the Biodiversity Gain Hierarchy have been

			thoroughly considered, as well as the targets & objectives within those respective frameworks.	
	Principle 10. Be transparent	The developer has made their commitments to Biodiversity Net Gain clear in a publicly available document. Results of project audits are publicly available where claims of BNG are made at relevant project stages, including project closure and any deviations from original design specifications are clearly stated. Evidence that the best available scientific knowledge and methods have been used in BNG design and implementation, and knowledge is transferred back to the scientific community.	A suitably worded Landscape Ecological & Environmental Management Plan or Habitat Management & Monitoring Plan (HMMP) will be available to the Local Planning Authority. This report shows how Biodiversity Net Gain can be achieved and can be upheld to support the transparency required to fulfil Principle 10.	
It should also be noted that whilst biodiversity measures that provide species specific enhancements are not measurable in unit value in the metric calculations, the proposals also recommend incorporating bat & bird boxes, invertebrate hotels (bee bricks), accessible holes for small mammals installed into fence panel and more general wildlife rich landscape planting.				
Strategic Significance considerations for Local Nature Recovery Strategy	Wiltshire Council has now adopted its Local Nature Recovery Strategy (LNRS), and accordingly Strategic Significance has been assessed in line with Table 3 of the strategy. This assessment gives full consideration to the Local Planning Authority's Strategically Significant Habitat Networks as delineated within the LNRS, including reference to the interactive LNRS mapped measures. Where relevant, direct reference has been made to the Local Nature Recovery Strategy for Wiltshire and Swindon, in particular Chapter 11.0 'Wiltshire and Swindon Priorities and Measures (Statement of Biodiversity Priorities)' and Chapter 12.0 'Priorities and Measures for Nature Recovery'. The site is located within a single LNRS Strategically Significant Habitat Network identified broadly as 'Mixed Habitats', and more specifically under the measure 'Create More Mixed Habitats'. BN Ecology has carefully reviewed Chapter 12.6 'Mixed Habitats', with particular regard to Measure (MH2): Mixed Habitats – Create More (pp. 68–70), and has set out in detail how the proposed habitat creation accords with the listed 'Actions' and 'Reasons' under MH2a–MH2f.			

Code	Action	Reason
Essential: Without taking these actions the habitat cannot be maintained/created.		
MH2a	Undertake early design and advice, especially for wood pasture or orchard creation. Survey for diverse habitat features such as ponds, flushes, topography etc. Where absent, undertake enhancements like blocking drainage, adding butterfly banks, or enriching swards. BN Ecology Response: Early design input has been provided, including detailed survey of the site redline boundary and adjoining blueline line baseline habitats to identify existing ecological features and opportunities for enhancement. The tree planting (T3) and the creation of additional neutral grassland targeting 'good' condition (TN7) will measurably enhance sward diversity and overall herbaceous species richness across the site.	To improve outcomes by planning ahead, adding features after habitat establishment can be difficult. BN Ecology Response: The submitted design demonstrates a proactive and structured approach to habitat creation, with appropriate features embedded within the layout from the outset, prior to establishment, thereby aligning with LNRS expectations for strategic habitat delivery.
MH2b	Introduce and diversify grazing animals (e.g., hardy cattle, pigs, ponies). Specialist advice can guide livestock choices. Cutting may be suitable in limited circumstances	To shape these habitats and create varied structure, domestic livestock are vital, providing dung, trampling, and disturbance that cutting alone can't replicate.

		such as for reopening a site. BN Ecology Response: Grazing is not considered necessary to achieve the target condition for the proposed habitats. Instead, a structured cutting regime will be implemented, as detailed within Appendix B, which demonstrates how varied sward structure and the required 'good' condition (TN7) will be achieved and maintained.	BN Ecology Response: The proposed cutting prescriptions have been designed to replicate structural variation typically associated with grazing, ensuring the habitats reach and sustain the specified target condition in accordance with LNRS objectives.
	MH2c	Develop scrub through grazing and natural processes. Monitor and adjust as needed for structure, i.e., excluding stock for 1–3 years can aid regeneration. Occasional mechanical intervention may still be required. BN Ecology Response: Whilst scrub creation is not proposed, the scheme has been carefully aligned with the LNRS 'Primary Priority Habitats' framework (pp.68–70). The site will deliver a mosaic of neutral grassland in 'good' condition alongside scattered individual rural trees targeting 'moderate' condition. Secondary features, including species-rich native hedgerows, will be incorporated along the southern boundary	To achieve and maintain desired outcomes timely changes to grazing or mechanical interventions are often key. BN Ecology Response: Mechanical management interventions will be secured through the Habitat Management and Monitoring Plan (HMMP) and, where relevant, cross-referenced to Appendix B to ensure delivery of the intended habitat structure and condition targets.

		extending east to west strengthen ecological connectivity and contribute to strategic significance at the local landscape scale.	
	MH2d	Once established, follow actions as per “Maintain and Enhance”. BN Ecology Response: Long-term management and monitoring will be fully secured and detailed within the HMMP to ensure the created habitats are maintained at or above their target condition for the lifetime of the development.	To maintain these important habitats for the long term benefit of wildlife and the wider landscape. BN Ecology Response: This shall be fully addressed in the HMMP.
	Ideally: While not strictly necessary to maintain/create this habitat, these actions will enhance the wildlife value of the habitat.		
	MH2e	Use traditional or rare breeds and new technology, such as GPS collars to apply varied grazing pressure across the site. BN Ecology Response: The use of grazing livestock or GPS-led grazing management is not considered necessary in this instance, given the scale and configuration of the site and the suitability of alternative management measures to achieve the required habitat outcomes.	Traditional breeds, being hardier, are well suited to creating varied habitat structure, and GPS collars can support grazing regimes that promote structural diversity. BN Ecology Response: Structural diversity will instead be delivered through tailored cutting and management prescriptions secured via the HMMP, ensuring compliance with LNRS habitat quality expectations.
	MH2f	Increase grassland diversity by introducing selected species through plug planting, overseeding, or green hay spreading.	To support flora establishment and boost species diversity, especially when creating habitat on arable land.

		BN Ecology Response: The creation of additional neutral grassland targeting 'good' condition will utilise an appropriate, carefully specified seed mix and establishment methodology (as detailed in Appendix B and to be expanded within the HMMP). This will significantly enhance floristic diversity across the site compared to the existing species-poor, agriculturally improved baseline modified grassland.	BN Ecology Response: The proposals will deliver a measurable uplift in botanical diversity on land currently defined as agricultural, thereby contributing to the LNRS strategic significance threshold for habitat creation in this mapped targeted area.
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Accordingly, and in line with the principles set out in Table 3 of the LNRS, it is considered that a proportionate and evidence-based case has been made to demonstrate that the proposed habitats comprising T3 (22 individual trees) and TN7 (0.061192 ha of other neutral grassland targeting 'good' condition) meet the definition of 'High Strategically Significance'. These habitats should therefore attract the applicable strategic significance multiplier of 1.15.

For clarity, whilst the proposed species-rich native hedgerow creation makes a positive contribution to the overall strategic coherence of the scheme, the linear units have not been classified as 'strategically significant' within this assessment. This reflects the need for more intensive management to prevent overshadowing of adjacent areas of other neutral grassland targeting 'good' condition, thereby ensuring that the primary habitat objectives are secured and maintained.

ARE PROPOSED HABITATS DEFINED AS SIGNIFICANT ON-SITE ENHANCEMENTS	Habitats categorised as 'u1b - Urban developed land; sealed surface', '828 - Vegetated gardens', 89 - Other green roof and 847 - Introduced Shrub are all considered to be either 'very low' or 'low' distinctiveness and do not require a condition assessment due to their perceived low value as a biodiversity proxy. Wiltshire Council does not delineate a local definition of 'significant' on-site habitat gains. Therefore, for the purposes of this assessment, the government definition of on-site significant habitat gains has been used, which is defined as follows: <i>'Significant enhancements are areas of habitat enhancement which contribute significantly to the proposed development's BNG, relative to the biodiversity value before development.'</i>
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Retention of existing habitat does not count as an on-site enhancement. What counts as a significant enhancement will vary depending on the scale of development and existing habitat, but these would normally be:

- **habitats of medium or higher distinctiveness in the biodiversity metric**
- *habitats of low distinctiveness which create a large number of biodiversity units relative to the biodiversity value of the site before development*
- **habitat creation or enhancement where distinctiveness is increased relative to the distinctiveness of the habitat before development**
- *areas of habitat creation or enhancement which are significant in area relative to the size of the development*
- *enhancements to habitat condition, for example from poor or moderate to 'good'*

As can be seen above, government definitions align with the proposals in relation to habitat creation on-site of 'medium' distinctiveness habitats and should be defined as 'significant' on-site gains.

Government guidance states that such gains concerning 'the maintenance of these significant enhancements must be secured with a legal agreement (planning obligation or conservation covenant) or planning condition for 30 years in the same way as off-site gains. LPAs will consider the most appropriate mechanism and this will need to be agreed at the planning permission stage.'

Therefore, the Local Planning Authority will determine the best securing mechanism.

REASONING FOR ON-SITE APPROACH IN ACCORDANCE WITH THE BIODIVERSITY GAIN HIERARCHY

Please refer to BN Ecology's justification presented above in response to the listed principles.

The Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2025 have brought in the concept of the Biodiversity Gain Hierarchy. This is complementary and supplements the wider mitigation hierarchy and applies specifically to the application of Biodiversity Net Gain. The below table provides justification for the on-site approach:

Table 7: Discussion points on how Biodiversity Gain Hierarchy Order has been applied to enable the project's biodiversity incorporation and lifespan.

Biodiversity Gain Hierarchy Order	Comment
1) <u>AVOID adverse effects to on-site habitat</u>	Due to the scale of the proposals and extent of the redline boundary, avoidance of adverse effects to on-site habitat is not fully possible. However, adverse effects are limited largely to habitats of 'low' distinctiveness. Where 'medium' distinctiveness habitats are being lost, these are limited to a 'small' in size class individual rural tree, which can be feasible compensated

		The line of trees on-site is being retained as far as possible as part of the proposals.
	2) <u>MITIGATE any adverse effects to habitat which cannot be avoided</u>	This primarily relates to mitigating impacts on habitat losses where their distinctiveness score is four or higher. The loss of one no. individual tree which is 'small' in size class is been compensated through the creation of 22 no. individual trees.
	3) <u>ENHANCE OR CREATE on-site habitat where any on-site habitat is adversely affected by the development</u>	As delineated in detail above, all on-site losses have been offset as far as possible, with over 16 % of the total redline boundary allocated as landscaped open space which comprises broadly speaking of habitat creation proposals. A 23.63% net gain is achieved on site via the creation of tree planting and other neutral grassland as detailed above
	4) <u>ENHANCE OR CREATE off-site habitat where on-site habitat gains are either in part or not at all possible.</u>	Not applicable.
	5) <u>SECURE REGISTERED OFF-SITE GAINS</u>	Not applicable.
	6) <u>PURCHASE STATUTORY CREDITS</u>	Not applicable.

4.2 Off-site Proposals

BASELINE BIODIVERSITY VALUE (OFF-SITE)	
BASELINE OFF-SITE AREA HABITAT	N/A
BASELINE OFF-SITE HEDGEROW HABITAT	N/A
BASELINE OFF-SITE WATERCOURSE	N/A

POST-INTERVENTION BASELINE BIODIVERSITY VALUE (OFF-SITE)	
POST-INTERVENTION OFF-SITE AREA HABITAT	N/A
POST-INTERVENTION OFF-SITE HEDGEROW HABITAT	N/A
POST-INTERVENTION OFF-SITE WATERCOURSE	N/A

HABITAT SUMMARY	
TOTAL NET UNIT CHANGE	+0.25 Area Unit; +0.33 Linear Hedgerow Units
TOTAL COMBINED NET % CHANGE	+23.63% Area Unit; +173.76% Linear Hedgerow Unit
TRADING RULES SATISFIED	Yes.

Statutory Credit Proposals

STATUTORY CREDITS LIKELY TO BE REQUIRED	N/A
STATUTORY CREDIT JUSTIFICATION	N/A

Phased Development Approach

HOW IS 10% BIODIVERSITY NET GAIN BEING ACHIEVED BROADLY ACROSS THE ENTIRE DEVELOPMENT	N/A
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HOW IS IT ANTICIPATED THAT BIODIVERSITY NET GAIN WILL BE TRACKED AND ACHIEVED PHASE-BY-PHASE, AND WHAT TARGET PERCENTAGE GAINS ARE ANTICIPATED FOR EACH PHASE	N/A
PROPOSED CONTINGENCY IF SUBSEQUENT PHASES DO NOT PROCEED OR FAIL	N/A
PRECAUTIONARY APPROACH	N/A

Irreplaceable Habitats Approach

ON-SITE IRREPLACEABLE HABITAT	N/A
Has there been any previous engagement with responsible and/or statutory organisations?	N/A
Environmental Record Centre Consultation	N/A

Habitat Regulations Assessment

Relationship with HRA Requirements	N/A
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5 Conclusion

As can be seen in this report, the biodiversity value associated with the development has been extensively considered, along with on-site and off-site mitigation in accordance with the Biodiversity Net Gain Good Practice Principles, The Mitigation Hierarchy and the Biodiversity Net Gain Hierarchy. The applicant shall achieve Biodiversity Net Gain through a on-site measures, comprising of:

Retention proposals (Area Units):

- TN1, g4 – Grassland – Modified Grassland, 'Poor' Condition, Low Distinctiveness | 0.010697ha | 0.02 units – retained as a field access for the client, allowing access into their retained blueline boundary land which will remain unaffected, and has thus been marked under the retention proposals.
- ST, u1b – Urban – Developed Land, Very Low Distinctiveness | 0.0071 ha | 0.00 units, comprising a cesspit to be replaced with a septic tank

Creation proposals (Area Units):

- TN3, u1b – Urban - Developed land; sealed surface, Very Low Distinctiveness | 0.245712ha | 0.00 units – all proposed hardstanding areas.
- TN4, 828 – Urban – Vegetated Garden, Low Distinctiveness | 0.137877ha | 0.27 units – allocated private residential gardens.
- TN5, g3c – Grassland – Other Neutral Grassland, Medium Distinctiveness, Targeting 'Poor' Condition | 0.018925ha | 0.07 units – small areas of other neutral grassland outside of private residential curtilage, allocated as landscaped open space.
- TN6, 89 – Urban – Other Green Roof, Low Distinctiveness | 0.007499ha | 0.01 units – Sedum blanket green roof which will be situated on top of the proposed garage carparking port
- T3, 32 – Individual Trees – Rural Trees, Medium Distinctiveness, Targeting 'Moderate' Condition | 22 no. Individual Native Trees | 0.32 units – trees shall be native stock & locally sources, and planted within areas allocated as landscaped open space, outside of residential curtilage.
- TN7, g3c – Grassland – Other Neutral Grassland, Medium Distinctiveness, Targeting 'Good' Condition | 0.061192ha | 0.59 units – An extensive area that shall be secluded from the 'built' develop a long the southern boundary extending east to west, which can feasibly achieve 'good' condition subject to appropriate management activities being secured for a period minimum of 30-years.
- TN8 847 – Urban – Introduced Shrub, Low Distinctiveness | 0.003098ha | 0.01 Units – two linear, low maintenance shrub patches situated on either side of the proposed access verges to be planted with undetermined shrub species.

Creation proposals:

- H1, h2a5 – Hedgerow - Species-rich Native Hedgerow, Medium Distinctiveness, Targeting 'Poor' Condition | 0.035km | 0.13 Units – Extending a long part of the southern boundary of the site, allocated within landscaped open space. The hedgerow shall be managed to ensure the width and height does not extent beyond 1.5m, to ensure overshading of the grassland targeting 'good' condition does not occur.
- H2, h2a5 – Hedgerow - Species-rich Native Hedgerow, Medium Distinctiveness, Targeting 'Poor' Condition | 0.082km | 0.33 Units – Extending a long part of the southern boundary of the site, allocated within landscaped open space. The hedgerow shall be managed to ensure the width and height does not extend beyond 1.5m, to ensure overshading of the grassland targeting 'good' condition does not occur.

Creation proposals (Creation in advance, 30+ years – previously L1) :

- L2, 33 – Line of Trees, Low Distinctiveness, Targeting 'Poor' Condition | 0.02km | 0.04 Units – existing northern line of trees (currently in 'moderate condition) being retained but targeting a lower condition (see 'additional notes' section above for details)
- L3, 33 – Line of Trees, Low Distinctiveness, Targeting 'Poor' Condition | 0.017km | 0.03 Units – existing northern line of trees (currently in 'moderate condition) being retained but targeting a lower condition (see 'additional notes' section above for details)

Therefore, it is deemed that enough information has been provided to the Local Planning Authority to establish with sufficient certainty that, if planning permission was granted, the applicant is capable of discharging the biodiversity gain condition and thus achieving their biodiversity gain objective.

Appendix A: Figures

For convenience – press “Alt + Left Arrow” to return to the section of the report



Site Photos

Figure A: Photo showing current access to the site from Mantles Lane.



Figure B: Photo showing TN1.



Figure C: Photo showing TN1 and L1.



Figure D: Photo showing TN2 and L1.



Figure E: Photo showing T1.



Figure F (BlueLine):
Photo showing TN1.



Figure G (BlueLine):
Photo showing
flooding in TN1.



Figure H (BlueLine):
Photo showing TN3.



Appendix B: Project Implementation Prescriptions

Individual Rural tree planting.	It is proposed that a realistic expectation to achieve the targeted condition can be fulfilled by targeting the following criterion: • The tree is a native species (or at least 70% within the block are native species). • 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). • 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. A relaxed infrequent regime pertaining to pruning should be followed which does not infringe on canopy spread. • Regular maintenance concerning weeding, watering and monitoring for common tree pests will be performed. Checking and, if necessary, replacing tree guards should also be undertaken. • When trees establish (usually after year 10), tree guards should be removed. • While not essential, sensitive pruning is important to encourage upward growth to create a diverse canopy structure. • Coppicing newly planted trees at the base will encourage new growth. It will also allow more light to reach the floor, thus encouraging a flowering understorey. • If necessary, stock fencing to provide an exclusion area should be established to prevent access which may compromise this condition criterion being met in the 30-year time period.
Other Neutral Grassland creation	This can be realistically achieved by increasing the species diversity within the existing sward and allowing the areas that have been damaged by the horse grazing practices time to recover. The objective will be to create a more diverse species-rich grassland. The Defra Metric Habitat guidance states that other neutral grassland needs to be able to demonstrate a minimum of 10 native plant species (grasses, wildflowers, sedges) per square metre on average. Activities to implement and achieve this may include: • Sowing a species-rich, native grassland seed mix with wildflowers, such as the EM5, EM4F or EM6 mix as delineated above.

		Alternatively, spreading appropriately selected seeds, provided by a local donor site, could be considered; • Ensuring there is less than 5% scrub and less than 20% bracken cover; • Ensuring there is less than 30% of grassland covered by perennial ryegrass and white clover combined; • Managing the habitat in such a way to ensure that wildflowers (and if appropriate sedge species) grow over at least 20% of the habitat area; • Protecting the habitat to ensure bare ground and other signs of damage (e.g. excessive littering, poaching etc) covers less than 5% of the total area; • No invasive non-native plant species as listed on Schedule 9 of the Wildlife and Countryside Act (1981) present; • Ensuring cover of species indicative of suboptimal condition and physical damage (e.g. excessive poaching, damage from machinery use or storage, damaging levels of access, or any other damaging management activities) accounts for less than 5% and; • Ensuring that sward height has a wider variation (at least 20% of the sward less than 7cm and at least 20% more than 7cm). The parcel of land proposed to create other neutral grassland should be stock fenced to prevent grazing from cattle (such as horses, known to graze near to the Site). Such preventative measures will allow young seedlings to germinate, flower, produce seeds and repeat the process year on year, thus increasing the concentration, abundance and diversity of the habitat. Some human intervention (especially in the first few years) may be required to over-seed the area of modified grassland with the locally sourced, species rich seed mix to assist and aid the growth and species diversity.
Species-rich Hedgerow	Native	Hedgerows will be planted during the dormant season (November–March) in a double staggered (zig-zag) row at approximately 400–500mm centres, with rows set c. 400–600mm apart to ensure dense establishment. A minimum 1m wide planting strip will be cleared of grass and competing vegetation prior to planting and lightly cultivated to reduce compaction and promote root establishment. Bare-root plants will be: - Kept moist prior to planting - Planted at nursery depth with roots fully spread - Firmed in to remove air pockets - Watered in during dry conditions Shrubs may be planted in small groups of the same species to reflect a naturalistic composition. Damaged roots will be

trimmed prior to planting. Mulch (c. 75mm depth) will be applied along the planting strip to suppress weeds and retain moisture. Protective guards will be installed where required.

Establishment and Aftercare (Years 1–5)

Formative pruning in the first spring will reduce plants to 450–600mm to promote dense basal growth.

Competing vegetation will be controlled within at least 0.5m either side of the hedge for the first three growing seasons.

Watering will be undertaken during prolonged dry periods.

Any plant failures will be replaced in the following planting season to maintain hedge continuity.

Long-Term Management

Once established (>1.5m height), hedgerows will be managed on a 2–3 year rotational cutting regime to enhance structural diversity, flowering and berry production. Cutting will avoid the bird nesting season (March–August inclusive), unless preceded by appropriate checks.

An undisturbed margin will be retained alongside the hedge to maximise habitat value and ecological connectivity.



Appendix C: Latin names

Floral species	
Species	Latin name
Annual meadow grass	<i>Poa annua</i>
Barren brome	<i>Bromus sterilis</i>
Bird's-foot trefoil	<i>Lotus corniculatus</i>
Bittersweet	<i>Solanum dulcamara</i>
Bluebells	<i>Hyacinthoides non-scripta</i>
Broad-leaved dock	<i>Rumex obtusifolius</i>
Bulbous buttercup	<i>Ranunculus bulbosus</i>
Carnation sedge	<i>Carex panicea</i>
Chickweed	<i>Stellaria media</i>
Cleavers	<i>Galium aparine</i>
Comfrey	<i>Symphytum officinale</i>
Common bent	<i>Agrostis capillaris</i>
Common bindweed	<i>Calystegia sepium</i>
Common dock	<i>Rumex obtusifolius</i>
Common fleabane	<i>Pulicaria dysenterica</i>
Common nettle	<i>Urtica dioica</i>
Common ragwort	<i>Jacobaea vulgaris</i>
Common reed	<i>Phragmites australis</i>
Common sorrel	<i>Rumex acetosa</i>
Common thistle	<i>Cirsium vulgare</i>
Cocks-foot	<i>Dactylis glomerata</i>
Cows parsley	<i>Anthriscus sylvestris</i>
Cranesbill	<i>Geranium dissectum</i>
Creeping bent	<i>Agrostis stolonifera</i>
Creeping buttercup	<i>Ranunculus repens</i>
Creeping cinquefoil	<i>Potentilla reptans</i>
Crested dogs-tail	<i>Cynosurus cristatus</i>
Cut-leaved cranesbill	<i>Geranium dissectum</i>
Dandelion	<i>Taraxacum officinale</i>
Devil's-bit scabious	<i>Succisa pratensis</i>
Dog's mercury	<i>Mercurialis perennis</i>
Dyer's greenweed	<i>Genista tinctoria</i>
False oat grass	<i>Arrhenatherum elatius</i>
Field bindweed	<i>Convolvulus arvensis</i>
Floating sweet-grass	<i>Glyceria fluitans</i>
Garlic mustard	<i>Alliaria petiolata</i>
Great mullein	<i>Verbascum thapsus</i>
Ground ivy	<i>Glechoma hederacea</i>
Hairy sedge	<i>Carex hirta</i>
Hawksbeard	<i>Crepis</i>
Heath spotted-orchid	<i>Dactylorhiza maculata</i>
Hedge bedstraw	<i>Galium mollugo</i>
Hedge woodruff	<i>Galium odoratum</i>
Hedge woundwort	<i>Stachys sylvatica</i>
Hemlock	<i>Conium maculatum</i>



Herb-Robert	<i>Geranium robertianum</i>
Hogweed	<i>Heracleum sphondylium</i>
Hop	<i>Humulus lupulus</i>
Horse parsley	<i>Smyrniolus olusatrum</i>
Horsetail	<i>Equisetum arvense</i>
Honeysuckle	<i>Lonicera periclymenum</i>
Lilac	<i>Syringa vulgaris</i>
Lady's bedstraw	<i>Galium verum</i>
Lords and ladies	<i>Arum maculatum</i>
Meadow barley	<i>Hordeum secalinum</i>
Meadow buttercup	<i>Ranunculus acris</i>
Meadow foxtail	<i>Alopecurus pratensis</i>
Meadow thistle	<i>Cirsium dissectum</i>
Meadow vetchling	<i>Lathyrus pratensis</i>
Morning glory	<i>Ipomoea purpurea</i>
Oval sedge	<i>Carex ovalis</i>
Oxeye daisy	<i>Leucanthemum vulgare</i>
Ragwort	<i>Senecio jacobaea</i>
Red campion	<i>Silene dioica</i>
Red clover	<i>Trifolium pratense</i>
Red fescue	<i>Festuca rubra</i>
Ribwort plantain	<i>Plantago lanceolata</i>
Rosebay willowherb	<i>Chamerion angustifolium</i>
Rosemary beetle	<i>Chrysolina americana</i>
Roses	<i>Rosa</i> spp.
Rough hawksbeard	<i>Crepis biennis</i>
Rough meadow grass	<i>Poa trivialis</i>
Pendulous sedge	<i>Carex pendula</i>
Pepper-saxifrage	<i>Silene silaus</i>
Perennial rye grass	<i>Lolium perenne</i>
Saw-wort	<i>Serratula</i>
Self-heal	<i>Prunella vulgaris</i>
Sharp-flowered rush	<i>Juncus acutiflorus</i>
Shepherd's purse	<i>Capsella bursa pastoris</i>
Silverweed	<i>Potentilla anserina</i>
Smooth meadow-grass	<i>Poa pratensis</i>
Smooth hawksbeard	<i>Crepis capillaris</i>
Snowberry	<i>Symphoricarpos albus</i>
Soft brome	<i>Bromus hordeaceus</i>
Soft rush	<i>Juncus effusus</i>
Sugar thistle	<i>Cirsium vulgare</i>
Spiked sedge	<i>Carex spicata</i>
Stitchwort	<i>Stellaria holostea</i>
Sweet vernal grass	<i>Anthoxanthum odoratum</i>
Timothy grass	<i>Phleum pratense</i>
Virginia creeper	<i>Parthenocissus quinquefolia</i>
Wall barley	<i>Hordeum murinum</i>
White clover	<i>Trifolium repens</i>
White dead-nettle	<i>Lamium album</i>

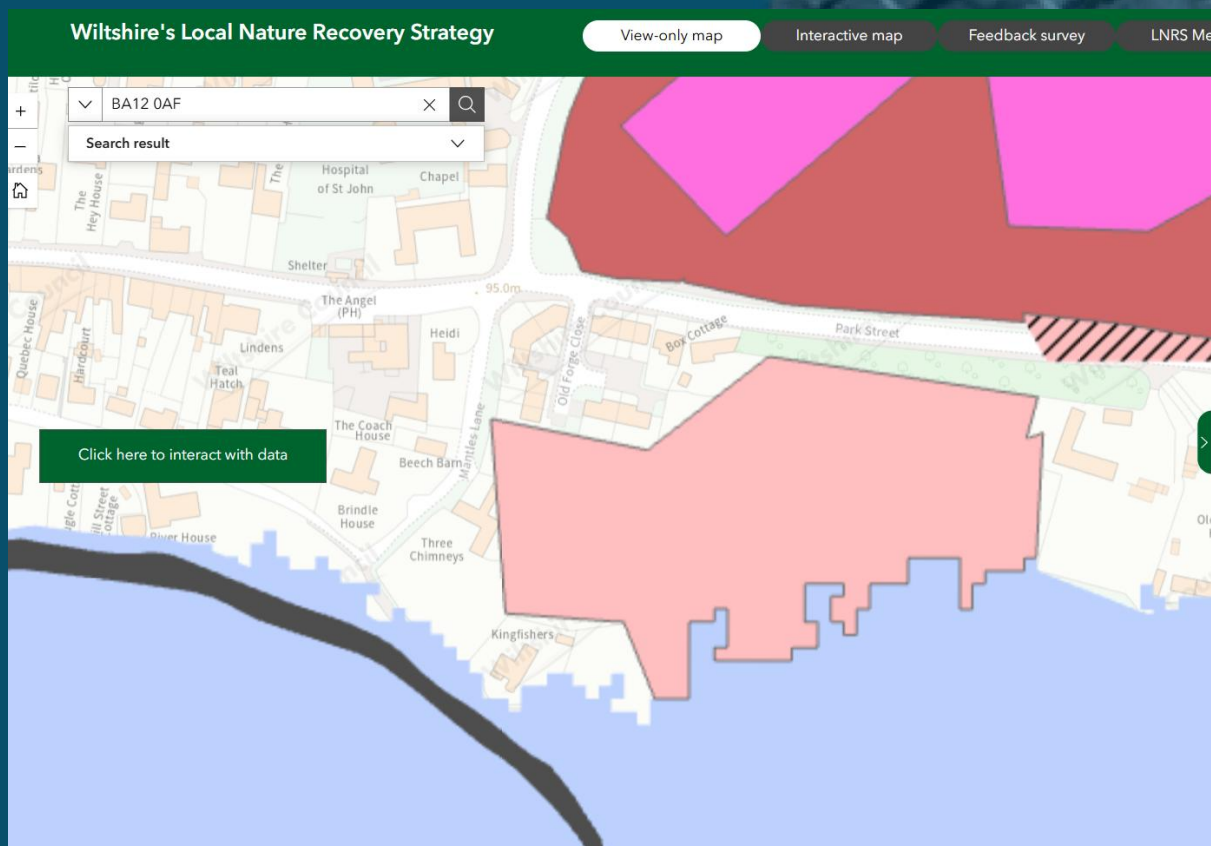


Wild onion	<i>Allium vineale</i>
Wild privet	<i>Ligustrum vulgare</i>
Wood avens	<i>Geum urbanum</i>
Wood speedwell	<i>Veronica montana</i>
Yarrow	<i>Achillea millefolium</i>
Yorkshire fog	<i>Holcus lanatus</i>

Tree species	
Species	Latin name
Ash	<i>Fraxinus excelsior</i>
Beech	<i>Fagus sylvatica</i>
Blackthorn	<i>Prunus spinosa</i>
Bramble	<i>Rubus fruticosus agg</i>
Buddleia	<i>Buddleja davidii</i>
Canadian poplar	<i>Populus × canadensis</i>
Common buckthorn	<i>Rhamnus cathartica</i>
Conifer	
Dog rose	<i>Rosa canina</i>
Dogwood	<i>Cornus sanguinea</i>
Elder	<i>Sambucus nigra</i>
Elm	<i>Ulmus procera</i>
Field maple	<i>Acer campestre</i>
Garden privet	<i>Ligustrum ovalifolium</i>
Goat willow	<i>Salix caprea</i>
Hawthorn	<i>Crataegus monogyna</i>
Hazel	<i>Corylus avellana</i>
Highbush cranberry	<i>Viburnum trilobum</i>
Holly	<i>Ilex aquifolium</i>
Hornbeam	<i>Carpinus betulus</i>
Horse chestnut	<i>Aesculus hippocastanum</i>
Oak	<i>Quercus robur</i>
Rowan	<i>Sorbus aucuparia</i>
Scot pine	<i>Pinus sylvestris</i>
Silver birch	<i>Betula pendula</i>
Spindle	<i>Euonymus europaeus</i>
Sweet chestnut	<i>Cryphonectria parasitica</i>
Sycamore	<i>Acer pseudoplatanus</i>
Wayfaring tree	<i>Viburnum lantana</i>



Appendix D: Site's Location in relation to Wiltshire Councils LNRS Strategically Significant Habitat Networks



Mixed Habitats

-  Create More Mixed Habitats
-  Maintain and Enhance Mixed Habitats

Open Mixed Habitats

-  Create More Open Mixed Habitats (Calcareous Soil)

Nature on Our Doorstep



BNG
Y

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