



Breeze Wilder



# The House, Minety

## Baseline

### Biodiversity Net Gain Assessment

Document Control

| Project details   |                                                                         |
|-------------------|-------------------------------------------------------------------------|
| Site              | The House, Minety, Malmesbury, SN16 9QG,<br>OS Grid Ref: SU 02705 90756 |
| Client            | Sheila Ward                                                             |
| Document          | Baseline Biodiversity Net Gain Assessment                               |
| Sit visit date    | 27/01/2025                                                              |
| Report draft date | V1 12/02/2025                                                           |
| BNG Ecologist     | Simon Breeze, BSC., MCIEEM, Principal Ecologist & Biodiversity Advisor  |

Quality Assurance

This report has been prepared in accordance with the Chartered Institute of Ecology and Environmental Management (2015) ‘*Guidelines for Ecological Report Writing*’ and with the British Standards Institution (2013) ‘*BS42020 Biodiversity – A code of practice for planning and development*’, and UK Governments Planning practice guidance on biodiversity net gain. The author is a full member of the Chartered Institute of Ecology and Environmental Management and is covered by CIEEM’s ‘*Code of Professional Conduct*’ (available from CIEEM website: <https://www.cieem.net/>).

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## 1. Introduction

### 1.1 Project background

This Baseline Biodiversity Net Gain (BNG) Assessment has been undertaken for The House, located at Minety, Malmesbury, SN16 9QG. The Site is 0.042 hectares (ha) in area and is a landholding comprised of a private garden, primarily laid to vegetable garden, hardstanding paths, greenhouse, shed and an garage.

This BNG assessment aims to determine the pre-development biodiversity value of the site, forming the baseline for calculating BNG as part of the active planning proposals to create a new residential dwelling. The assessment is designed to facilitate the planning application validation and determination process, and to secure a minimum of a 10% BNG obtained through a Biodiversity Gain Condition and/or evidence of BNG Unit purchase.

### 1.2 Scope of Report

This report is informed by a UK Habitat (UKHab) classification survey and the completion of Statutory Biodiversity Metric (SBM) to produce an assessment report that:

- Establishes the total number of baseline Area Habitat Units (AHU) within the Site,
- Outlines the Site habitat and development proposals and makes recommendations for how AHU can be retained, enhanced, and created under the current proposed intervention scenario,
- Provides evidence for supporting and adhering to the Local Planning Authority statutory validation requirement, and
- Provides recommendations for how the proposed project can achieve a minimum 10% net gain for biodiversity, whilst evidencing compliance with the BNG good practice principles<sup>1</sup>

## 2. Methodology

This BNG assessment has been produced by Simon Breeze, Principal Ecologist & Biodiversity Advisor, Bachelor of Science (BSc.), full member of the Chartered Institute of Ecology and Environmental Management (MCIEEM), Level 2 Bat Licence holder (CL18), Level 1 Dormouse Licence holder (CL10a) and Level 1 Great Crested Newt Licence holder (CL08).

This BNG assessment uses the following industry recognised good practice guidance:

- CIEEM, IEMA & CIRIA (2016) Biodiversity Net Gain: Good Practice Principles for
- Development
- Natural England (2024) Statutory Biodiversity Metric (SBM) 23.07.24, following the methodology set out within the Metric 3.1 User Guide and Technical Supplement.
- British Standard 8683 Process for designing and implementing Biodiversity Net Gain Specification (2021)

- CIEEM (2021) Biodiversity Net Gain Reporting and Audit Templates

## 2.1 Site Survey

A site visit to undertake a UKHab classification survey and habitat condition assessment was undertaken on the 31<sup>st</sup> January 2025.

## 2.1 Data Sources

The following data sources have been used to complete the BNG assessment:

1. Publicly available Open-Source Natural England datasets for Habitats of Principal Importance (HPI), ancient woodland (classed as irreplaceable habitat), and statutory designated sites for nature conservation. The results of the desk study have been used to inform the strategic significance value in line with the methodology detailed within the SBM **Section 2.4**.
2. A UK Habitat (UKHab) classification survey following best practice guidelines (UKHab Ltd, 2023). This survey provided a baseline habitat database which details the habitat types present on Site, their area (ha) and their geographic distribution (**Appendix A and D**).
3. All areas / lengths of habitats have been measured using QGIS mapping software with reference to a base map (OSGB).
4. A habitat condition assessment (HCA) completed concurrently with the desk-based habitat survey, following the methodology detailed within the SBM.

## 2.2 Irreplaceable habitats and statutory designated sites

In accordance with the SBM methodology, impacts on irreplaceable habitats, very high distinctiveness habitats and statutory designated sites have been avoided through the design following the mitigation hierarchy.

Statutory designated sites were identified by referencing against publicly available Open-Source Natural England datasets with the Site boundary.

It is important to note that BNG cannot be achieved for a Project if there is a loss of irreplaceable habitat or a loss of habitat from within statutory designated sites.

## 2.3 Strategic Significance

BNG should aim to contribute to local strategic priorities for nature. The SBM includes an incentive for this through the Strategic Significance score. Strategic Significance for baseline and post-development habitats at Site were categorised following the approach set out in the SBM User Guide<sup>1</sup>.

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<sup>1</sup> [https://assets.publishing.service.gov.uk/media/65c60e0514b83c000ca715f3/The\\_Statutory\\_Biodiversity\\_Metric\\_-\\_User\\_Guide\\_.pdf](https://assets.publishing.service.gov.uk/media/65c60e0514b83c000ca715f3/The_Statutory_Biodiversity_Metric_-_User_Guide_.pdf)

2.4 Limitations and assumptions

Although a Wiltshire and Swindon Local Nature Recovery Strategy was not available at the time of assessment, it is considered that the information sought and referenced in Section 2.1 and 2.2 was sufficient to assign Strategic Significance.

3. Results

3.1 Onsite Baseline Biodiversity Value

The biodiversity baseline value of the Site has been calculated using the Defra Statutory Biodiversity Metric (SBM). Habitat types have been assessed for their condition, area, and distinctiveness (Table 1). See SBM Calculation within **Appendix C**.

The Site plans include the retention of a proportion of the vegetated garden for the proposed new dwelling.

Table 1. The following habitats were identified on-site, categorised under the UK Habitat Classification system

| UKhab Code | UKhab Description              | Condition | Area (Ha) | Habitat Units |
|------------|--------------------------------|-----------|-----------|---------------|
| U1d        | Vegetated private garden       | N/A       | 0.025     | 0.05          |
| U1b6       | Developed land, sealed surface | N/A       | 0.007     | 0             |
| U1b5       | Building                       | N/A       | 0.006     | 0             |
| U1D,200    | Urban tree (Holly)             | Moderate  | 0.0041    | 0.03          |
| Total      |                                |           | 0.0421    | 0.08          |

A UKHab plan showing the habitats classified in Table 1 can be seen in in **Appendix A**.

3.3 Irreplaceable Habitats

There are no irreplaceable habitat(s) corresponding to the descriptions outlined in *The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024* on the Site’s land to which this application relates. This conclusion applies as of the date the pre-development biodiversity value of onsite habitat(s) was calculated. Irreplaceable habitats, such as ancient woodland, ancient hedgerows, or

primary habitats of special scientific interest, were not identified as present during the Site baseline survey.

Additionally, it has been confirmed that no known significant loss or degradation of any onsite habitat(s) has occurred as a result of any activities carried out before the date the pre-development biodiversity value of the onsite habitat(s) was calculated. Therefore, the baseline condition of the habitats is found to reflect their true ecological value without any significant adverse changes prior to this assessment.

### 3.4 Strategic Significance

The Site is located within an area that is without a recognised local nature recovery strategy as no local strategy was published at the time of writing. Furthermore, the Site is situated among intensive agricultural farmland to the north, and residential development to the remaining surrounds and is therefore considered isolated from areas of national and international significance within the wider area.

### 3.5 Protected and Priority Species and Habitats

The site did not contain any habitats of principal importance under the NERC Act 2006, with the site comprised of a vegetable garden, amenity grassland, walls, fences, a greenhouse, shed and a garage with hardstanding surrounds. The southern boundary contained a clump of early mature ash trees with ivy growth that has been pollarded and cut to chest height. The ash trees may provide limited opportunities for common nesting passerines, with this area in regularly use from vegetable gardening, therefore likely leading to disturbance sufficient to reduce nesting within this location. A full preliminary bat roost assessment of the garage was not undertaken as part of the site visit commission, however from external observations it was possible to see that the garage was in a good structural condition with no obvious gaps and crevices around the eaves and tiles. No internal inspection was undertaken.

### 3.5 Site photographs



|                                                                                                                        |                                                                                     |
|------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|
| <p><b>Photo 1.</b> The vegetated private graden, laid to vegetable garden with shed and greenhouse, looking south.</p> | <p><b>Photo 2.</b> The vegetated garden looking north.</p>                          |
|                                       |   |
| <p><b>Photo 3.</b> The Holly tree among amenity lawn vegetated garden.</p>                                             | <p><b>Photo 4.</b> The garage building on the northern boundary.</p>                |
|                                      |  |
| <p><b>Photo 5.</b> The clump of cut ash trees with ivy growth</p>                                                      | <p><b>Photo 6.</b> The western boundary .</p>                                       |

## 4. BNG Evaluation and Recommendations

### 4.1 Post development BNG proposals

Post development proposals are to retain an area of vegetated private garden of approximately 0.015ha, and to retain the medium sized holly tree on site. Otherwise, the remaining area will be development land.

## 4.2. Onsite Post development Biodiversity Value

Habitat to be retained and created are documented within Table 2. A summary of the SBM calculations can be found within **Appendix C**, and within the supporting full SBM excel spreadsheet associated with this assessment report. A UKHab plan showing the habitats classified in **Table 2** can be seen in **Appendix A**.

**Table 2.** Post development habitats to be retained and created

| UKhab Code              | UKhab Description        | Condition | Area (Ha)     | Habitat Units Lost |
|-------------------------|--------------------------|-----------|---------------|--------------------|
| <b>Retained</b>         |                          |           |               |                    |
| U1d                     | Vegetated private garden | N/A       | 0.015         | 0.02               |
| U1D,200                 | Urban tree (Holly)       | Moderate  | 0.0041        | 0                  |
| <b>Retained/Created</b> |                          |           |               |                    |
| U1b                     | Developed land           | NA        | 0.0312        | 0                  |
| <b>Total</b>            |                          |           | <b>0.0421</b> | <b>0.02</b>        |

## 4.3 Onsite Biodiversity Value Change Evaluation

The baseline habitat value of the Site is **0.08 units**, comprising vegetated private garden and one urban tree.

The post development habitat value of the Site is **0.06 units**, comprising of a loss of vegetated private garden.

This results in a net change in biodiversity of **0.02 units of -24.15% (i.e. a net loss)**, as confirmed within the SBM Headline Results (Figure 1).

Figure 1 - Headline results from the SBM calculation tool

|                                                                                    |                   |       |         |
|------------------------------------------------------------------------------------|-------------------|-------|---------|
| On-site baseline                                                                   | Habitat units     | 0.08  |         |
|                                                                                    | Hedgerow units    | 0.00  |         |
|                                                                                    | Watercourse units | 0.00  |         |
| On-site post-intervention<br>(Including habitat retention, creation & enhancement) | Habitat units     | 0.06  |         |
|                                                                                    | Hedgerow units    | 0.00  |         |
|                                                                                    | Watercourse units | 0.00  |         |
| On-site net change<br>(units & percentage)                                         | Habitat units     | -0.02 | -24.15% |
|                                                                                    | Hedgerow units    | 0.00  | 0.00%   |
|                                                                                    | Watercourse units | 0.00  | 0.00%   |

| FINAL RESULTS                                                                                                |        |                          |                |              |
|--------------------------------------------------------------------------------------------------------------|--------|--------------------------|----------------|--------------|
| <b>Total net unit change</b><br>(Including all on-site & off-site habitat retention, creation & enhancement) |        | <i>Habitat units</i>     | -0.02          |              |
|                                                                                                              |        | <i>Hedgerow units</i>    | 0.00           |              |
|                                                                                                              |        | <i>Watercourse units</i> | 0.00           |              |
| <b>Total net % change</b><br>(Including all on-site & off-site habitat retention, creation & enhancement)    |        | <i>Habitat units</i>     | <b>-24.15%</b> |              |
|                                                                                                              |        | <i>Hedgerow units</i>    | 0.00%          |              |
|                                                                                                              |        | <i>Watercourse units</i> | 0.00%          |              |
| Unit Type                                                                                                    | Target | Baseline Units           | Units Required | Unit Deficit |
| <i>Habitat units</i>                                                                                         | 10.00% | 0.08                     | 0.09           | <b>0.03</b>  |
| <i>Hedgerow units</i>                                                                                        | 10.00% | 0.00                     | 0.00           | 0.00         |
| <i>Watercourse units</i>                                                                                     | 10.00% | 0.00                     | 0.00           | 0.00         |

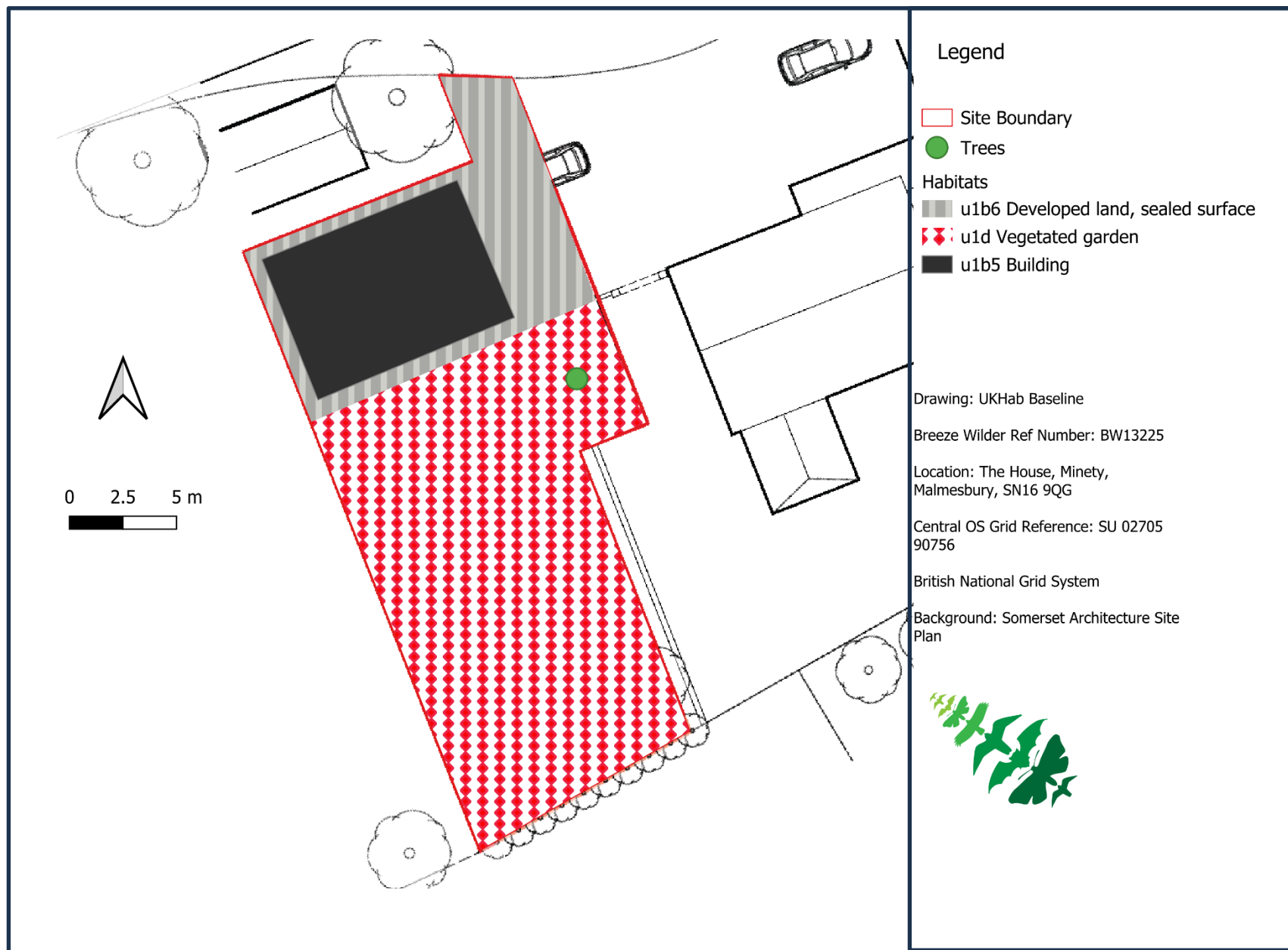
#### 4.4 Biodiversity Net Gain Delivery

As the development is proposed within a private garden, following guidance within the SBM guidance and BNG Planning Practice Guidance, BNG can not be secured and delivered onsite, therefore the applicant proposes to achieve a minimum 10% net gain in biodiversity, in line with local and national planning policy and legislation, by purchasing local BNG Units from a local habitat bank. If local BNG units are unavailable, as a last resort, the purchase of Statutory BNGH Credits will be obtained.

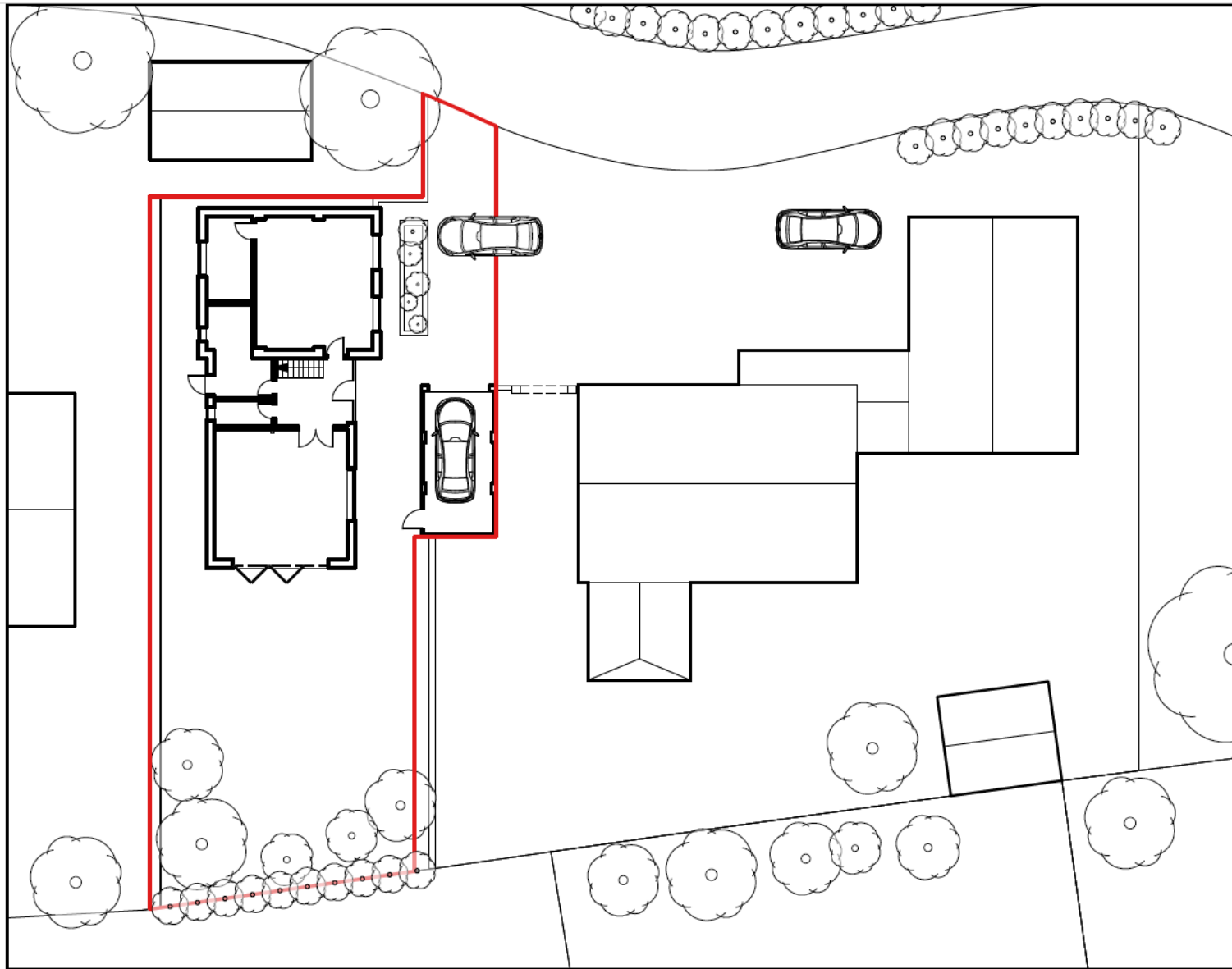
**Biodiversity Net Gain Units required for purchase = 0.03 Units**

It is advised that a suitably worded condition is attached to the Local Planning Authority's application determination, requesting evidence of proof of BNG Unit purchase.

## Appendix A: UKhab Baseline Plan



## Appendix B: Proposed Site Plan



## Appendix C: Baseline Statutory Biodiversity Metric Calculations

See attached for full Statutory Biodiversity Metric, dated 12/02/2025

|                                                                                |                        |              |                                |                 |                                                           |       |           |                          |                                                            |                                                            |                                   |                                                                     |                                                   |               |               |                         |                         |                   |            |
|--------------------------------------------------------------------------------|------------------------|--------------|--------------------------------|-----------------|-----------------------------------------------------------|-------|-----------|--------------------------|------------------------------------------------------------|------------------------------------------------------------|-----------------------------------|---------------------------------------------------------------------|---------------------------------------------------|---------------|---------------|-------------------------|-------------------------|-------------------|------------|
| Project Name: The House, Minaty    Map Reference: A-1 On-Site Habitat Baseline |                        |              |                                |                 | Area habitat summary                                      |       |           |                          |                                                            |                                                            |                                   |                                                                     |                                                   |               |               |                         |                         |                   |            |
| Condense / Show Columns    Condense / Show Rows    Main Menu                   |                        |              |                                |                 | Total Net Unit Change    -0.02                            |       |           |                          |                                                            |                                                            |                                   |                                                                     |                                                   |               |               |                         |                         |                   |            |
|                                                                                |                        |              |                                |                 | Total Net % Change    -24.15%                             |       |           |                          |                                                            |                                                            |                                   |                                                                     |                                                   |               |               |                         |                         |                   |            |
|                                                                                |                        |              |                                |                 | Trading Rules Satisfied    No - check trading summaries A |       |           |                          |                                                            |                                                            |                                   |                                                                     |                                                   |               |               |                         |                         |                   |            |
|                                                                                |                        |              |                                |                 |                                                           |       |           |                          |                                                            |                                                            |                                   |                                                                     |                                                   |               |               |                         |                         |                   |            |
| Ref                                                                            | Existing area habitats |              |                                |                 | Distinctiveness                                           |       | Condition |                          | Strategic significance                                     |                                                            |                                   | Required Action to Meet Trading Rules                               | Ecological baseline<br>Total habitat units        |               |               |                         |                         |                   |            |
|                                                                                | Broad Habitat          | Habitat Type | Irreplaceable habitat          | Area (hectares) | Distinctiveness                                           | Score | Condition | Score                    | Strategic significance                                     | Strategic significance                                     | Strategic significance multiplier |                                                                     |                                                   | Area retained | Area enhanced | Baseline units retained | Baseline units enhanced | Area habitat lost | Units lost |
|                                                                                | 1                      | Urban        | Vegetated garden               | No              | 0.025                                                     | Low   | 2         | Condition Assessment N/A | 1                                                          | Area compensation not in local strategy/ no local strategy | Low Strategic Significance        | 1                                                                   | Same distinctiveness or better habitat required ≥ | 0.05          | 0.015         | 0.03                    | 0.00                    | 0.01              | 0.02       |
|                                                                                | 2                      | Urban        | Developed land; sealed surface | No              | 0.007                                                     | V.Low | 0         | N/A - Other              | 0                                                          | Area compensation not in local strategy/ no local strategy | Low Strategic Significance        | 1                                                                   | Compensation Not Required                         | 0.00          |               | 0.00                    | 0.00                    | 0.01              | 0.00       |
|                                                                                | 3                      | Urban        | Developed land; sealed surface | No              | 0.006                                                     | V.Low | 0         | N/A - Other              | 0                                                          | Area compensation not in local strategy/ no local strategy | Low Strategic Significance        | 1                                                                   | Compensation Not Required                         | 0.00          |               | 0.00                    | 0.00                    | 0.01              | 0.00       |
| 4                                                                              | Individual trees       | Urban tree   | No                             | 0.0041          | Medium                                                    | 4     | Moderate  | 2                        | Area compensation not in local strategy/ no local strategy | Low Strategic Significance                                 | 1                                 | Same broad habitat or a higher distinctiveness habitat required (≥) | 0.03                                              | 0.0041        | 0.03          | 0.00                    | 0.00                    | 0.00              |            |

## National legislation

### Environment Act 2021

The Act requires a minimum of 10% net gain for biodiversity as a condition of planning permission.

Net gain is to be measured by the biodiversity metric published by the Secretary of State.

This is the Natural England Biodiversity Metric 3.1 Calculation Tool. The Act requires that gains must be secured for a minimum of 30 years post completion of development.

Also, under Section 40 the NERC Act 2006, as amended by the Environment Act 2021, “A public authority which has any functions exercisable in relation to England must from time to time consider what action the authority can properly take, consistently with the proper exercise of its functions, to further the general biodiversity objective.”...the biodiversity objective is, “...the conservation and enhancement of biodiversity in England through the exercise of functions in relation to England”. This is referred to as the Biodiversity Duty.

### UK Government’s 25 Year Environment Plan

The UK Government’s 25 Year Environment Plan (DEFRA, 2018) states a desire to ‘embed a ‘net environmental gain’ principle for development to deliver environmental improvements locally and nationally’ and plans to consult on making Biodiversity Net Gain a mandatory requirement.

On 14th March 2019, Her Majesty’s Treasury confirmed that following consultation, the government will use the forthcoming Environment Bill to mandate BNG for development in England, ensuring that the delivery of much-needed infrastructure and housing is not at the expense of vital biodiversity.

### Biodiversity 2020: A strategy for England’s wildlife and Ecosystem Services

Biodiversity 2020: A strategy for England’s wildlife and ecosystem services (DEFRA, 2011) is the national strategy for biodiversity. This sets out an ambition to halt the loss of biodiversity and see an increase in the area of priority habitats by 200,000 ha by 2020. Biodiversity 2020 sets in policy the objectives to improve our wildlife sites, make them bigger, develop more of them and join them up (summarised as ‘Bigger, Better, More and Joined’).

### National Planning Policy Framework

The revised National Planning Policy Framework (NPPF) (MHCLG, 2021) refers to conserving and enhancing the natural environment. This requires Local Authorities in England to take measures to:

- Conserve and enhance biodiversity;
- Protect the habitats of these species from further decline;
- Protect the species from the adverse effect of development; and
- Refuse planning permission for development, if significant harm resulting from a development cannot be avoided, adequately mitigated, or, as a last resort, compensated for.
- Although not currently a legal obligation, the revised NPPF refers to biodiversity and environmental net gains in the following paragraphs:
- Transport Infrastructure

· Paragraph 102. *“Transport issues should be considered from the earliest stages of planmaking and development proposals, so that:*

*d) the environmental impacts of traffic and transport infrastructure can be identified assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for **net environmental gains**.”*

- Planning decisions

· Paragraph 118. *“Planning decisions and planning policy should a) encourage multiple benefits from both urban and rural land ... and taking opportunities to **achieve net environmental gains - such as developments that would enable new habitat creation**.”*

· Paragraph 170. *“Planning policies and decisions should contribute to and enhance the natural and local environment by: ... d) minimising impacts on and **providing net gains** for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.”*

· Paragraph 174. *“To protect and enhance biodiversity and geodiversity plans should b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing **measurable net gains for biodiversity**.”*

· Paragraph 175. *“When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts) adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused; ... and d) ... opportunities to incorporate biodiversity improvements in and around developments, especially where this can secure **measurable net gains for biodiversity**.”*

### Natural Environment and Rural Countryside Act

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

Section 40 sets out that:

- Paragraph 1. *“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”; and that*
- Paragraph 3. *“Conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat”.*
- Section 41 sets out that:  
Paragraph 1. *“The Secretary of State must... publish a list of the living organisms and types of habitat ... of principal importance for the purpose of conserving biodiversity”* based on consultation with Natural England; and that
- Paragraph 3a. Every planning authority must *“a) take such steps... to further the conservation of the living organisms and types of habitat included in any list published under this section, or (b) promote the taking by others of such steps”.*

## Disclaimer

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This work has been undertaken in accordance with the quality management system of Breeze Wilder.



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