

Biodiversity Net Gain Assessment – Accompanying Report

Equestrian Cottage, Manton Estate, Marlborough, Wiltshire

March 2026

1. Introduction and Policy

- 1.1. The Environment Act 2021, aims to place nature recovery at the centre of political decision making at both the national (England) and local level. A principle element of the Environment Act 2021 is the requirement, through Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021), that new developments must deliver a mandatory 10% net gain for biodiversity (subject to certain exemptions).
- 1.2. The 'Statutory Biodiversity Metric Calculation Tool' (SBMCT) is a nationally recognised tool for demonstrating quantifiable net gain for biodiversity. The Statutory Biodiversity Metric Tool must be used to calculate biodiversity net gain. Biodiversity net gain can be achieved by creating biodiversity either on-site or off-site. Biodiversity net gain can also be achieved via the purchase of biodiversity units. If a development cannot achieve either on-site or off-site biodiversity net gain (or a mixture of both) by the aforementioned options, statutory biodiversity credits can be purchased. Biodiversity net gain must be secured for at least 30 years.
- 1.3. Icon Ecology was commissioned by Manton Park Farms in January 2025 to undertake a Biodiversity Net Gain Assessment to inform a planning application for an equestrian worker's cottage, set within the Manton Estate, Marlborough, Wiltshire, hereafter referred to as the 'site'. This report accompanies the SBMCT, providing a summary of the results of the SBMCT and justifies the choice of habitat definitions, distinctiveness, target habitat condition and temporal factors where appropriate.

2. Background Statements

- 2.1. It is understood that and it should be noted that:
 - The development is not phased;
 - No irreplaceable habitats are present on-site;
 - The applicant understands that should planning permission be granted, it shall be subject to the biodiversity gain condition; and
 - The applicant is aware of activities undertaken at the site, on or after the 30th January 2020, which have resulted in a degradation in the baseline biodiversity value of the site. This is discussed further in Section 4.4 below.

3. Surveyor and Author's Experience

- 3.1. The surveyor and author is Jack Crump (Ref: IE/JC). Jack Crump is a Full Member of the Chartered Institute of Ecology and Environmental Management (MCIEEM), with over 18 years of relevant experience within a consultancy setting. Jack Crump has been undertaking and advising on Biodiversity Net Gain Assessments since 2012, and is therefore suitably authoritative to assess these proposals. As such, the findings and assessment detailed within this Biodiversity Net Gain Assessment can be relied upon to inform the planning application.

4. Methodology

- 4.1. In accordance with DEFRA's 'The Statutory Biodiversity Metric – User Guide' (July 2025), the 'before development' (existing baseline) information has been input into the SBMCT. This information has been obtained from ecological survey of the site (Phase 1 Habitat and Habitat Condition Assessment 24th January 2025), undertaken by a suitably qualified ecologist (Ref IE/JC), as well as from information obtained from historical aerial photographs.
- 4.2. The 'after/post development' information, obtained from the "Landscape Proposals" prepared by WHLandscape (March 2026) (see Appendix 1097/1), with additional habitat input provided by Icon Ecology, has also been entered into the SBMCT. This allows the relevant pre-development habitat baseline (e.g. Habitat units, Hedgerow units & Watercourse units) to be quantified and the change resulting from development measured.
- 4.3. A range of guidance documents have been utilised to inform this assessment and the condition assessment of existing habitats within the site as well as the condition of habitats following completion of development. DEFRA's 'The Statutory Biodiversity Metric – User Guide' (July 2025), 'The Statutory Biodiversity Metric – Technical Annex 1: Condition Assessment Sheets and Methodology' (v1.0.2, July 2025), UKHab 'The UK Habitat Classification – Version 2.0' (2023) and 'Planning Practice Guidance on Biodiversity Net Gain' (May 2024) being the primary guidance documents. These documents have been supplemented with guidance provided within the Joint Nature Conservation Committee [2010, as amended] 'Handbook for Phase 1 habitat survey: A technique for environmental audit'; 'Guidelines for Preliminary Ecological Appraisal (Chartered Institute for Ecology and Environmental Management [CIEEM] [2013]'; and the Farm Environment Plan (FEP) manual (third edition 2010).
- 4.4. **Hedgerow:** Based on a review of freely available aerial photography, it is understood that a hedgerow was previously associated with the west of the site, which has been removed at some point between 31st July 2020 and 22nd April 2021. As the removal of the hedgerow associated with the site occurred after the 30th January 2020, a length of hedgerow has been included within the pre-development BNG habitat baseline to inform this assessment. On a precautionary basis, this hedgerow is assumed to be a 'Species-rich native hedgerow' in 'Good' condition.

5. Biodiversity Net Gain Assessment – Strategic Significance

- 5.1. Wiltshire Council have formally published and adopted the Wiltshire and Swindon Local Nature Recovery Strategy (LNRS), although the site is not located within any areas identified within the LNRS. Accordingly, in accordance with 'The Statutory Biodiversity Metric – User Guide' (July 2025), the baseline strategic significance values for habitat parcels in site have been scored as 'Low - Area / compensation not in local strategy / no local strategy, with a multiplier of '1.0' applied to all pre-development habitat categories in the 'Strategic significance' drop-down menu column.
- 5.2. Post-development, the definitions for 'High' strategic significance are not met and the 'Medium' category cannot be applied, when an LNRS has been published. A multiplier of '1.0' (Low - Area / compensation not in local strategy / no local strategy) has therefore been applied to all post-development habitat categories for the 'Strategic significance' drop-down menu column.

6. Biodiversity Net Gain Assessment – Before Development (On- Site)

- 6.1. This section references, justifies and discusses the before development habitat categories and their condition selected from the drop-down menus of the SBMCT within tab 'A-1 On-Site Habitat Baseline' and tab 'B-1 On-Site Hedge Baseline'. All relevant condition assessment sheets are provided in Appendix 1097/2.

On-Site Habitat Baseline (tab A-1)

- 6.2. **Grassland – 'Modified grassland'; Condition – Good:** The site associated with the built footprint comprises of grassland habitat. The habitat passes 6 of 7 condition assessment criterion, including the 'essential criterion' (criterion A), which results in a condition assessment score of 'Good' (Total habitat units = 1.11).
- 6.3. **Urban – 'Developed land; sealed surface'; Condition – N/A:** Area of the site comprising an existing hard-surface access track and turning area. No condition assessment for this habitat type is required (Total habitat units = 0.00).

On-Site Hedge Baseline (tab B-1)

- 6.4. **'Species-rich native hedgerow'; Condition – Good (Hedge number – H1):** Historic aerial photography shows a hedgerow which was previously associated with the site. On a precautionary basis this hedgerow is assumed to be a 'Species-rich native hedgerow' in 'Good' condition (Total hedgerow units = 0.05).

7. Biodiversity Net Gain Assessment – After Development (On- Site)

- 7.1. This section references, justifies and discusses the after development habitat categories and their condition selected from the drop-down menus of the SBMCT, within tab 'A-2 On-Site Habitat Creation' and tab 'B-2 On-Site Hedge Creation'.

On-Site Habitat Creation (tab A-2)

- 7.2. **Urban 'Developed land; sealed surface'; Condition – N/A:** This habitat includes the newly created residential building and hard-surfaced access and turning. The SBMCT automatically prescribes the condition of this habitat as N/A (Total habitat units delivered = 0.00).
- 7.3. **Urban – 'Vegetated Garden'; Condition – N/A:** The area of the site which comprises the amenity grass garden associated with the new building. The SBMCT automatically prescribes the condition of Vegetated Garden as 'N/A' (Total habitat units = 0.06).
- 7.4. **Heathland and shrub 'Mixed scrub'; Condition – Poor:** An area proposed to be planted with mixed shrubs at the perimeter of the amenity garden. The habitat would be unlikely to pass more than 2 of the condition assessment criterion, resulting in a condition assessment score of 'Poor' (Total habitat units = 0.15).
- 7.5. **Individual trees 'Rural tree'; Condition – Moderate:** 46 native trees are proposed to be planted within an area of retained modified grassland, approximately 3m apart. Using the precautionary principle, these trees are considered to be in the 'small' size class. The 'Tree helper' box in the Main Menu tab of the SBMCT has been utilised to calculate the total area of habitat provided by these trees. The habitat would pass a minimum of 4 of the condition assessment criterion, resulting in a condition assessment score of 'Moderate' (Total habitat units = 0.57).

On-Site Hedge Creation (tab B-2)

- 7.6. **'Species-rich native hedgerow'; Condition – Poor (Hedge number – HA):** New lengths of species-rich hedgerow (HA) are to be planted. Although hedgerow HA would likely have no more than 4 criterion failures and would not fail both attributes in more than 1 functional group, resulting in a condition assessment score of 'Moderate', using the precautionary principle, a condition assessment score of 'Poor' has been entered (Total hedgerow units: HA = 0.22).

8. ResultBiodiversity Net Gain Assessment – Area Habitat Unit Score

- 8.1. The metric determines the 'On-site habitat baseline' to equal a total of **1.11 Area habitat units**, and 'On-site post-intervention' to equal a total of **1.22 Area habitat units**. Overall, the metric calculates a 'Total net unit change' for Area habitat units of **+0.12 units**, a 'Total net % change' of **+10.61%**.

Biodiversity Net Gain Assessment – Hedgerow Unit Score

- 8.2. The metric determines the 'On-site hedgerow baseline' to equal a total of **0.05 Hedgerow units**, and 'On-site post-intervention' to equal a total of **0.22 Hedgerow units**. Overall, the metric calculates a 'Total net unit change' for Hedgerow units of **+0.16 units**, a 'Total net % change' of **+302.44%**.

9. Summary & Conclusion

- 9.1. In order to inform the planning application, a Biodiversity Net Gain (BNG) Assessment calculation has been carried out using the 'Statutory Biodiversity Metric Calculation Tool' (SBMCT). The BNG Assessment calculates that a biodiversity net gain of +0.12 Area habitat units and a net gain of +0.16 Hedgerow units results from the proposed development, which also satisfies the 'Trading Rules'. This represents a total on-site biodiversity net percentage change of +10.61% Area habitat units and +302.44% for Hedgerow units.
- 9.2. On-site, the proposals can therefore result in at least a 10% net gain for biodiversity. The proposals are therefore in compliance with the Environment Act 2021.

Enclosed:

Plan P-1097/BNG1 – Biodiversity Net Gain Assessment: Before

Plan P-1097/BNG2 – Biodiversity Net Gain Assessment: After

Appendix 1097/1 – Landscape Proposals – WHLandscape (March 2026)

Appendix 1097/2 – Relevant Habitat Condition Assessment Sheets

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Key:

 1097 - Site Boundary

A1: On-Site Habitat Baseline (Retained)

Broad Habitat	Habitat Type	Condition	Ha
	Grassland	Good	0.0739
	Urban	N/A	0.1376

A2: On-Site Habitat Creation

Broad Habitat	Proposed habitat	Condition	Ha
	Urban	N/A	0.0414
	Urban	N/A	0.0307
	Heathland & shrub	Poor	0.0383
	Individual trees	Moderate	0.1873

B2: On-Site Hedge Creation

Hedge number	Habitat Type	Condition	km
 HA	Species-rich native hedgerow	Poor	0.0563

0 20 40 m



Icon Ecology

Equestrian Cottage, Manton Estate,
Marlborough
Biodiversity Net Gain Assessment: After

P-1097/BNG2

March 2026

PROJECT
TITLE
FIGURE No
REVISION
DATE

Beech Rich Woodland Species Mix						
Scientific name	Common name	Specification*	Girth (cm)	Approx. height	%	C/U**
Trees						
<i>Acer campestre</i>	Field maple	Whip	-	90-120cm	17	C/T
<i>Betula pendula</i>	Silver birch	Whip	-	90-120cm	14.5	U/T
<i>Fagus sylvatica</i>	Common beech	Whip	-	90-120cm	45	C/T
<i>Prunus avium</i>	Wild cherry	Whip	-	90-120cm	14	U/T
<i>Sorbus aucuparia</i>	Rowan	Transplant	-	60-80cm	9.5	U/T
Shrubs						
<i>Cornus sanguinea</i>	Dogwood	Transplant	-	60-80cm	15	U
<i>Corylus avellana</i>	Hazel	Transplant	-	60-80cm	35	U
<i>Crataegus monogyna</i>	Hawthorn	Whip	-	90-120cm	20	U
<i>Euonymus europaeus</i>	Spindle	Transplant	-	60-80cm	7.5	U
<i>Ilex aquifolium</i>	Holly	Pot-grown (3L)	-	30-40cm	7.5	U
<i>Ligustrum vulgare</i>	Wild Privet	Transplant	-	60-80cm	7.5	U
<i>Rosa canina</i>	Dog Rose	Transplant	-	60-80cm	7.5	U
* Approximately 10% of the total tree mix should comprise larger stock (Light Standard - Standard)						
** Canopy/Understory (T – Tree)						

Recommended Mixed Native Hedge Species					
Scientific name	Common name	Specification	Approx. height (cm)	%	
<i>Corylus avellana</i>	Hazel	1 + 1 transplants	60-80	20	
<i>Crataegus monogyna</i>	Hawthorn	1 + 1 transplants	60-80	55	
<i>Euonymus europaeus</i>	Spindle	1 + 1 transplants	60-80	5	
<i>Ilex aquifolium</i>	Holly	Pot-grown (3ltr)	40-60	2.5	
<i>Ligustrum vulgare</i>	Wild Privet	1 + 1 transplants	60-80	2.5	
<i>Prunus spinosa</i>	Blackthorn	1 + 1 transplants	60-80	10	
<i>Viburnum lantana</i>	Wayfaring tree	1 + 1 transplants	60-80	5	

Recommended Grass Mixture	
Mix name	Sowing rate (g/m²)
Hardwearing Grass Mixture (Emorsgate EG22 or equivalent)	25

Recommended Native Scrub Species					
Scientific name	Common name	Specification	Approx. height (cm)	Planting centres (m)	%
<i>Cornus sanguinea</i>	Dogwood	Bare Root Whip	90 – 120	1.5	15
<i>Corylus avellana</i>	Hazel	Bare Root Whip	90 – 120	1.5	20
<i>Crataegus monogyna</i>	Hawthorn	Bare Root Whip	90 – 120	1.5	30
<i>Euonymus europaeus</i>	Spindle	Bare Root Whip	90 – 120	1.5	7.5
<i>Ilex aquifolium</i>	Holly	Pot-Grown	90 – 120	1.5	5
<i>Rosa canina agg</i>	Dog Rose	Bare Root Whip	90 – 120	1.5	5
<i>Ulex europaeus</i>	Gorse	Bare Root Whip	90 – 120	1.5	7.5
<i>Viburnum lantana</i>	Common Wayfaring Tree	Bare Root Whip	90 – 120	1.5	5
<i>Viburnum opulus</i>	Guelder Rose	Bare Root Whip	90 – 120	1.5	5

KEY:

- Vegetation to be removed

Existing vegetation

- Woodland

- Grassland

Proposed vegetation

- Woodland area to be enhanced

- Individual tree

- Mixed native scrub

- Mixed native hedgerow

- Hardwearing amenity lawn

Other

- Post and rail fence

- Patio

- Gravel driveway

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Recommended Tree Species						
Plan Ref.	Scientific name	Common name	Specification	Girth (cm)	Approx. height (m)	Clear stem height (m)
Ac	<i>Acer campestre</i>	Field maple	Standard	8 – 10	2.50/3.00	1.75/2.00
Cm	<i>Crataegus monogyna</i>	Hawthorn	Light standard	6 – 8	2.50/3.00	1.50/1.75
Fs	<i>Fagus sylvatica</i>	Beech	Select Standard	10 – 12	3.00/3.50	Min 2.00
Ms	<i>Malus sylvestris</i>	Crab apple	Light standard	6 – 8	2.50/3.00	1.50/1.75
Pa	<i>Prunus avium</i>	Wild cherry	Select Standard	10 – 12	3.00/3.50	Min 2.00
Pp	<i>Prunus padus</i>	Bird cherry	Select Standard	10 – 12	3.00/3.50	Min 2.00



Sandcliffe House, Northgate Street,
Devizes, Wiltshire SN10 1JT
t: 01380 727539 e: info@whlandscape.co.uk

Project:
Proposed Trainer's House - Manton Park Farm

On behalf of:
Manton Park

Drawing title:
Landscape Proposals

Drawing number:
WHL-2079-02

Rev:
ES

Date:
Mar 26

Scale:
1:400 @ A3

DB:
WH

Condition Sheet: GRASSLAND Habitat Type (low distinctiveness)			
UK Habitat Classification (UKHab) Habitat Type			
Grassland - Modified grassland			
On-site or off-site, site name and location	Equestrian Cottage, Manton Estate, Marlborough	Survey date and Surveyor name	24/01/2025 IE/JC
Limitations (if applicable)		Survey reference (if relating to a wider survey)	
Grid reference		Habitat parcel reference	
Habitat Description			
ukhab – UK Habitat Classification			
Condition Assessment Criteria		Criterion passed (Yes or No)	Notes (such as justification)
A	There are 6-8 vascular plant species per m ² present, including at least 2 forbs (these may include those listed in Footnote 1). Note - this criterion is essential for achieving Moderate or Good condition. Where the vascular plant species present are characteristic of medium, high or very high distinctiveness grassland, or there are 9 or more of these characteristic species per m ² (excluding those listed in Footnote 1), please review the full UKHab description to assess whether the grassland should instead be classified as a higher distinctiveness grassland. Where a grassland is classed as medium, high, or very high distinctiveness, please use the relevant condition sheet.	Y	
B	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed.	Y	
C	Any scrub present accounts for less than 20% of the total grassland area. (Some scattered scrub such as bramble <i>Rubus fruticosus</i> agg. may be present). Note - patches of scrub with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.	Y	
D	Physical damage is evident in less than 5% of total grassland area. Examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities.	Y	
E	Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens) ² .	N	More than 10%
F	Cover of bracken <i>Pteridium aquilinum</i> is less than 20%.	Y	
G	There is an absence of invasive non-native plant species ³ (as listed on Schedule 9 of WCA ⁴).	Y	
Essential criterion achieved (Yes or No)			Y
Number of criteria passed			6
Condition Assessment Result (out of 7 criteria)	Condition Assessment Score	Score Achieved x/√	
Passes 6 or 7 criteria including passing essential criterion A	Good (3)	Y	
Passes 4 or 5 criteria including passing essential criterion A	Moderate (2)		
Passes 3 or fewer criteria; OR Passes 4 - 6 criteria (excluding criterion A)	Poor (1)		
Suggested enhancement interventions to improve condition score			
Footnotes			
Footnote 1 – Creeping thistle <i>Cirsium arvense</i> , spear thistle <i>Cirsium vulgare</i> , curled dock <i>Rumex crispus</i> , broad-leaved dock <i>Rumex obtusifolius</i> , common nettle <i>Urtica dioica</i> , creeping buttercup <i>Ranunculus repens</i> , greater plantain <i>Plantago major</i> , white clover <i>Trifolium repens</i> and cow parsley <i>Anthriscus sylvestris</i> .			
Footnote 2 – For example, this could include small, scattered areas of bare ground allowing establishment of new species, or localised patches where not exceeding 10% cover.			
Footnote 3 – Assess this for each distinct habitat parcel. If the distribution of invasive non-native species varies across the habitat, split into parcels accordingly, applying a buffer zone around the invasive non-native species with a size relative to its risk of spread into adjacent habitat, using professional judgement.			
Footnote 4 – Wildlife and Countryside Act 1981 (as amended).			