



Biodiversity Net Gain (BNG) Assessment

Folly Cottage Stables

July 2026



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1 Executive summary

- 1.1.2 A holiday let planned through conversion and extension of a timber stable building was granted consent in 2020 (20/01105/FUL). Variations enabling the alteration of windows, doors and a natural slate roof were also granted (PL/2023/04840 & PL/2026/00040).
- 1.1.3 During early stages of works, the existing timber frame was carefully inspected which revealed that the structure was not capable of safe retention or conversion. Wiltshire Council have advised that a new full planning application is required. A proposal identical in footprint, scale, massing and external appearance to the previously approved scheme has been submitted (PL/2026/04226) with a changed method of construction.
- 1.1.4 The site is located in the Green Belt and an Area of Outstanding Natural Beauty within the administrative boundary of Wiltshire Council at National Grid Reference ST 8422 7043.
- 1.1.5 The purpose of this report is to provide an ecological and Biodiversity Net Gain (BNG) assessment of proposals.
- 1.1.6 The Environment Act 2021 provides a new framework for environmental protection relating to issues such as air quality, water, biodiversity and waste reduction. Schedule 14 of the Act modified (schedule 7a) the Town and Country Planning Act 1990, making it mandatory for developers to deliver a 10% Biodiversity Net Gain (BNG) to the pre-development baseline natural habitat.
- 1.1.7 The habitat baseline of the proposed construction area largely comprised a building, areas of hardstanding and modified grassland as well as individual trees and a roadside hedgerow.
- 1.1.8 The *Small Sites Statutory Biodiversity Metric Calculation Tool* (June 2026) was used to calculate BNG. Area calculations were based on mapping undertaken using MapInfo Pro 2023.
- 1.1.9 Biodiversity net gain for small sites is difficult unless development occurs over habitats such as concrete hard standing of no biodiversity value. BNG calculations indicate a 33.62% net loss in habitat units and 28.72% net gain in hedgerow units requiring 0.3883 habitat units to meet a 10% net gain target.
- 1.1.10 It is not realistic to achieve net gain within the site and a solution lies in the purchase of commercially available off-site, biodiversity unit credits. Proposals set out in the NPPF (currently under consultation) would exempt the site from BNG required although the proposals are not yet in force.

2 Introduction

2.1 Background

- 2.1.1 A holiday let planned through conversion and extension of a timber stable building was granted consent in 2020 (20/01105/FUL). Variations enabling the alteration of windows, doors and a natural slate roof were also granted (PL/2023/04840 & PL/2026/00040).
- 2.1.2 During early stages of works, the existing timber frame was carefully inspected which revealed that the structure was not capable of safe retention or conversion. Timber studs measured only 38-65mm, sole plates were extensively rotten and part of the structure was supported by old telegraph poles over a bare earth floor with loose fill to 1.2m depth. Mann Williams Structural Engineers confirmed frame replacement was required.
- 2.1.3 Wiltshire Council have advised that a new full planning application is required. A proposal identical in footprint, scale, massing and external appearance to the previously approved scheme has been submitted (PL/2026/04226) with a changed method of construction.
- 2.1.4 The site is located in the Green Belt and an Area of Outstanding Natural Beauty within the administrative boundary of Wiltshire Council at National Grid Reference ST 8422 7043.

Figure 1: Location of the site.



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2.2 Purpose of this document

- 2.2.1 The purpose of this report is to provide an ecological and Biodiversity Net Gain (BNG) assessment of the proposals.

3 Legislation, planning policy and guidance

3.1 National Planning Policy Framework (NPPF) (2024)

3.1.1 The National Planning Policy Framework (NPPF) published in December 2024 remains valid until December 2025 proposals are adopted. The NPPF sets out the framework by which government intends growth to be achieved, whilst protecting the natural and historic environment for future generations. In particular, chapter 15 relates to conservation and enhancement of the natural environment.

3.1.2 When determining planning applications, paragraph 187 sets out the policies and decisions of local planning authorities should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;*
- 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 and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;*
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and*
- f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.*

3.1.3 In addition paragraph 193 of the NPPF sets out that when determining planning applications, local planning authorities should apply the following principles:

- a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*

- b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;*
- c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and*

3.1.4 *Development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.*

3.2 Environment Act 2021

3.2.1 The Environment Act 2021 provides a new framework for environmental protection relating to issues such as air quality, water, biodiversity and waste reduction. Schedule 14 of the Act modified (schedule 7a) the Town and Country Planning Act 1990, making it mandatory for developers to deliver a 10% Biodiversity Net Gain (BNG) to the pre-development baseline natural habitat.

3.2.2 Calculations are made using a DEFRA biodiversity metric calculation tool.

3.2.3 There are 3 ways a developer can achieve BNG:

- They can create biodiversity on-site (within the red line boundary of a development site).
- They can deliver through a mixture of on-site and off-site. Developers can either make off-site biodiversity gains on their own land outside the development site or purchase commercially available off-site biodiversity units.
- If developers cannot achieve on-site or off-site BNG, as a last resort, they must buy statutory biodiversity credits from the government. The government will use the revenue to invest in habitat creation in England.

4 Methodology

4.1 Desk study

- 4.1.1 A search for existing records of protected or otherwise notable species within 1km of the site was not commissioned given the small size of the site. GIS resources were utilised, including Natural England (NE) data, to identify nearby statutory designated sites.

4.2 Extended phase 1 habitat survey

- 4.2.1 A Phase 1 habitat survey of the site following standard methodology (CIEEM, 2017) was carried out by MPEcology on the 20th July 2026. During the site visit, each distinct habitat type was mapped and target noted according to categories set out by the Joint Nature Conservation Committee (JNCC, 2010). A note of the habitat in relation to the UK Habitat Classification¹ and incidental observations of plant and animal species were also made.

4.3 Daytime assessment for bats

- 4.3.1 A daytime assessment of trees (Collins, 2023) was undertaken on the same visit by an experienced, licensed bat worker in order to locate evidence of current or past bat roosts, in the form of bats, droppings, staining, feeding signs, and/or remains of bats.

4.4 Biodiversity Net Gain

- 4.4.1 The Small Sites Statutory Biodiversity Metric Calculation Tool (June 2026) was used to calculate BNG. Area calculations were based on mapping undertaken using MapInfo Pro 2023.

4.5 Good practice principles

- 4.5.1 Good practice principles in relation to BNG have been described by Baker *et al* (2016) and are summarised in Table 1 below:

Table 1. Good practice principles

Principle	In practice
Apply the mitigation hierarchy	Avoid then minimise impacts on biodiversity, compensate for losses that cannot be avoided firstly within development footprint then offsite.
Avoid loss of biodiversity that cannot be offset elsewhere	Avoid losses of irreplaceable biodiversity resources.
Be inclusive and equitable	Engage stakeholders and involve them in design, implementation, monitoring and evaluation of BNG.
Make measurable BNG contribution	Achieve measurable overall gains for biodiversity and ecosystem services whilst contributing towards nature conservation priorities.

¹ <https://ukhab.org/>

Achieve best outcomes for biodiversity	Achieve best outcomes using robust credible evidence and local knowledge when addressing BNG.
Be additional	Achieve outcomes that exceed obligations and do not deliver something that would occur anyway.
Create a net gain legacy	Ensure BNG generates long-term benefits.
Optimise sustainability	Prioritise BNG and optimise wider environmental benefits for a sustainable society and economy.
Be transparent	Communicate all net gain activities including learning with stakeholders

4.6 Surveyor

- 4.6.1 The surveyor and author of this report was Matthew Pickard (BSc., MSc.), an ecologist with over 20 years environmental consultancy experience, a Chartered Environmentalist (CEnv), full member of the Chartered Institute of Ecology and Environmental Management (MCIEEM) and a licensed bat (CL18-2015-12416-CLS) and great crested newt surveyor.

4.7 Limitations

- 4.7.1 Seasonal timing was not considered to be a constraint to assessment of the site.

5 Baseline Conditions

5.1 Designated sites

5.1.1 Box Mine Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC) is the nearest statutory designated site to Folly Cottage Stables. Designated sites identified within 5km were as follows:

- **Box Mine SSSI & SAC** – a SSSI that also forms part of the Bath and Bradford on Avon Bat SAC. In addition to providing foraging habitat, an extensive network of caves, mines and man-made tunnels in the local area are used by hibernating and mating bats. The SAC is of particular note for Bechstein's (*Myotis bechsteinii*), Greater Horseshoe (*Rhinolophus ferrumequinum*) and Lesser Horseshoe bat (*Rhinolophus hipposideros*) (719m south);
- **Colerne Park and Monk's Wood SSSI** – a southern calcareous Ash (*Fraxinus excelsior*)-Wych Elm (*Ulmus glabra*) wood on the oolitic limestone of the Wiltshire Cotswolds (1.23km north);
- **Honeybrook Farm SSSI** – a series of unimproved neutral to calcareous hay meadows, unimproved limestone grassland, ancient semi-natural woodland, a small lake and an undisturbed meandering stretch of river (1.74km north);
- **Corsham Railway Cutting** – a site notified for its geological interest for exposing a section through Upper Bathonian era Bath Oolite and Upper Rags/Forest Marble (1.82km south-east); and
- **Dank's Down and Truckle Hill SSSI** – botanically rich oolitic limestone grassland supporting nationally scarce plant and animal species including Bastard-toadflax (*Thesium humifusum*) (4.91km north).

5.1.2 Internationally significant sites within 10km include components of the Bath and Bradford on Avon Bat SAC.

5.1.3 The development falls within a SSSI Impact Risk Zone (IRZs) of Natural England² for “all planning applications (except householder) outside or extending outside existing settlements/urban areas affecting greenspace, farmland, semi natural habitats or landscape features such as trees, hedges, streams, rural buildings/structures”.

5.1.4 No direct impact to any designated site is envisaged. The potential for indirect impact to sites of European significance due to increased recreational visits or habitat loss is considered limited.

5.2 Protected species

5.2.1 The proposed development site was an active construction site and semi-natural habitat was limited to a fringe of grassland, a roadside hedgerow and some small trees at the

² [SSSI Impact Risk Zones \(England\) | SSSI Impact Risk Zones \(England\) | Natural England Open Data Geoportal \(arcgis.com\)](#)

south-eastern end. The habitats offered negligible potential for protected species although bats and birds may utilise the trees as well as the roadside hedgerow for foraging.

- 5.2.2 The site lies within an amber risk zone for Great Crested Newts (*Triturus cristatus*) although only one waterbody was identified using Ordnance Survey mapping within 500m. A single pond to the south-east of Folly Cottage lies approximately 100m from the site, the buildings of Folly Cottage located inbetween.

5.3 Existing habitats

Figure 2: Setting

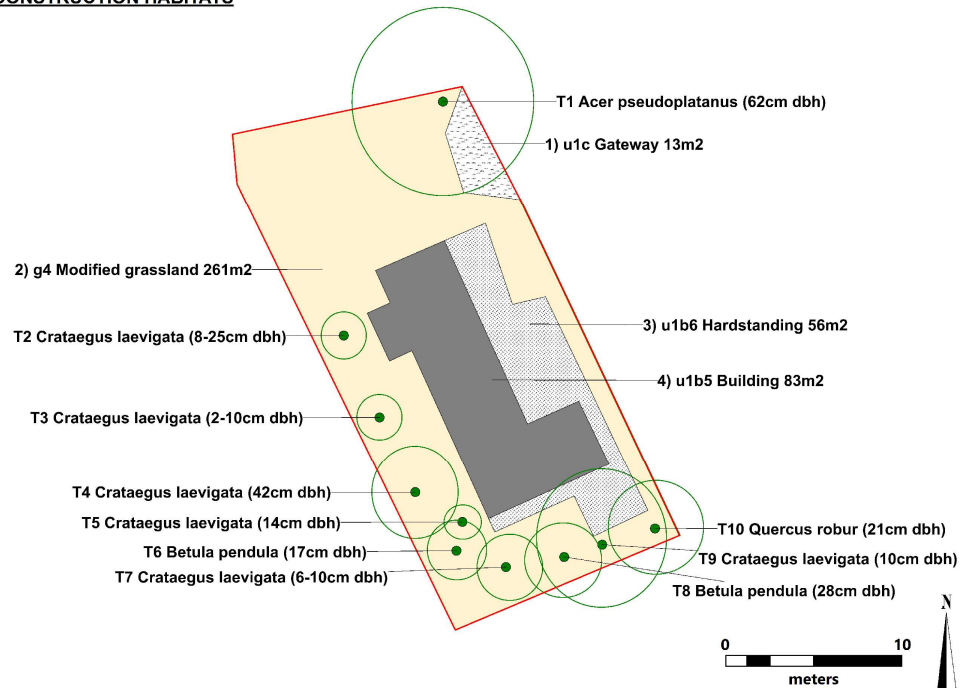


Pre-construction habitats

- 5.3.1 The study area has been disturbed due to the construction activities associated with earlier planning consents. In order to undertake BNG calculations, assumptions have been made of the pre-development baseline prior to degradation. Sources of information include web-based imagery, arboricultural survey and the design and access statement.

Figure 3: Preconstruction habitats

PRE-CONSTRUCTION HABITATS



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- 5.3.2 *Modified grassland* – Grassland associated with the stable block prior to degradation was considered likely to be attributable to g4 modified grassland of UKHabs.
- 5.3.3 *Artificial ground and buildings* – Concrete hardstanding formed working areas beside the timber stable block.
- 5.3.4 *Tree and hedgerows* – A 2023 arboricultural report by Sharples Tree Services provided detail on trees associated with the site.
- 5.3.5 The roadside hedgerow forming the northern site boundary was partially outgrown and supported a mix of Hawthorn (*Crataegus monogyna*), Sycamore (*Acer pseudoplatanus*), Blackthorn (*Prunus spinosa*) and Elder (*Sambucus nigra*). An impoverished ground cover comprised Ivy (*Hedera helix*), Nettle (*Urtica dioica*) and Cleavers (*Galium aparine*).

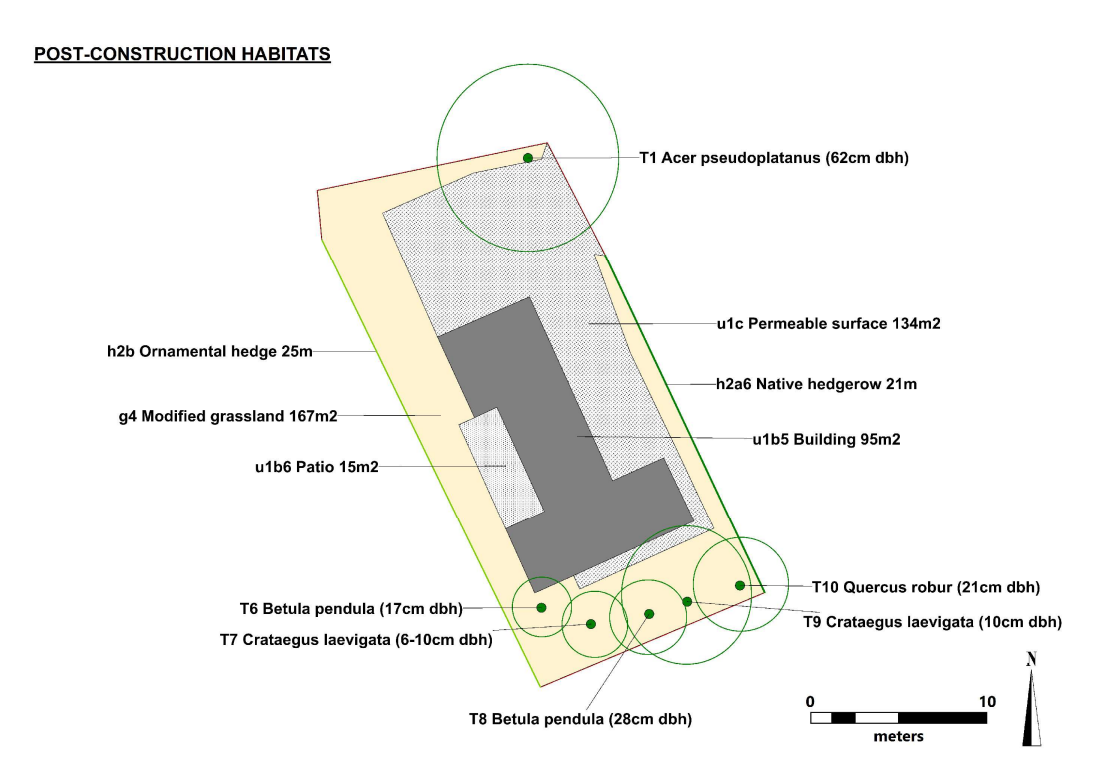


6 Post-construction habitats

6.1 Habitats post-construction

- 6.1.1 Development plans will involve the construction of a new structure based on the planned stable conversion. Post-construction habitats will comprise:

Figure 4: Post-construction habitats



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6.2 Baseline metric calculations

Table 2. Existing habitats

Broad Habitat	Habitat Type	Area (m ²)	Condition	Total habitat units	Area retained	Area enhanced	Area lost	Units lost	User comments
Urban	Developed land; sealed surface	83	N/A	0	83		0	0	Existing building
Urban	Developed land; sealed surface	56	N/A	0			56	0	Hardstanding
Urban	Artificial unvegetated unsealed	13	N/A	0	13		0	0	Gateway entrance
Grassland	Modified grassland	260	Moderate	0.1	167		93	0.037	Modified grassland
Urban tree	Trees	854.58		0.7862	569.72		284.86	0.2621	8x small, 1x medium & 1x large (3x small & 1x medium lost)
Total (excl trees)		412		0.1	263		149	0.037	

Table 3. On-site hedgerow baseline

Hedge number	Habitat Type	Length (m)	Total hedgerow units	Length retained	Length enhanced	Length lost	Units lost	User comments
1	Native hedgerow	21	0.084	21			0	Native hedge
Total		21	0.084	21			0	

Table 4. Post-construction created habitats

Broad habitat	Habitat type	Area (m²)	Condition	Total habitat units	User comments
Urban	Developed land; sealed surface	12	N/A	0	Extended building
Urban	Developed land; sealed surface	15	N/A	0	Patio
Urban	Artificial unvegetated unsealed	122	N/A	0	Artificial unvegetated ground of driveway & parking areas
Total (excluding trees)		149		0	-82.16% net loss in habitat units

Table 5. Post-construction hedgerow

Hedge number	Habitat Type	Length (m)	Total hedgerow units	User comments
2	Ornamental & non-native hedgerow	25	0.0241	Native hedge
Total		25	0.0241	

7 Discussion

- 7.1.1 Planning permission is being sort for a holiday let at Folly Cottage Stables. The habitat baseline of the proposed construction area largely comprised a building, areas of hardstanding and modified grassland as well as individual trees and a roadside hedgerow.
- 7.1.2 The site currently offers limited potential for wildlife and construction has already begun under an earlier consent.
- 7.1.3 Biodiversity net gain for small sites is difficult unless development occurs over habitats such as concrete hard standing of no biodiversity value. BNG calculations indicate a 33.62% net loss in habitat units and 28.72% net gain in hedgerow units requiring 0.3883 habitat units to meet a 10% net gain target.
- 7.1.4 It is not realistic to achieve net gain within the site and a solution lies in the purchase of commercially available off-site, biodiversity unit credits. Proposals set out in the NPPF (currently under consultation) would exempt the site from BNG required although the proposals are not yet in force.

8 References

Baker, J. (2016). *Biodiversity net gain good practice principles for development*. CIEEM, IEMA & CIRIA, UK

Institute of Environmental Assessment (1995). *Guidelines for Baseline Ecological Assessment*. Chapman and Hall, London.

Joint Nature Conservation Committee (2010). *Handbook for Phase 1 Habitat Survey: a technique for environmental audit*. JNCC, Peterborough.