

AtkinsRéalis



**Biodiversity Net Gain
Design Stage
Assessment**

Wiltshire Council

July 2026

LACKHAM ROUNDAABOUT

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Summary

Proposed Scheme	The Proposed Scheme is for a new bus stop and turning point to be constructed beside Lackham Roundabout to allow for the safe transit of students at Lackham College. A planning application will be submitted to Wiltshire Council for the change in roundabout layout, which will also provide the Biodiversity Net Gain (BNG) post-development calculations to understand if compensation is required on or off-site to achieve the mandatory 10% BNG.
Desk studies and field surveys	An Ecological Impact Assessment (EclA) report has been produced alongside this assessment to inform the Proposed Scheme design and support the planning submission. A UKHab walkover survey and BNG condition assessment were undertaken on the 12/05/2026, where all habitats within the Application Site were mapped and condition assessed.
Irreplaceable habitats	There are no ancient woodlands or other irreplaceable habitats directly within the Application Site, or within 1 km of the Application Site.
Application of the BNG Principles, the Mitigation Hierarchy and the Biodiversity Gain Hierarchy	The BNG hierarchy and mitigation hierarchy have been applied as part of this assessment. The Proposed Scheme has sought to avoid and minimise habitat losses where possible. The BNG Principles have been taken into account in the design of the Proposed Scheme.
BNG Metric	Using the Statutory Metric, the Application Site has pre-development biodiversity unit values of 5.16 area habitat units and 0.99 hedgerow habitat units. The Proposed Scheme, as currently understood, will deliver 4.97 area habitat units and 0.99 hedgerow units, predominantly via habitat retention. The BNG assessment shows that the Proposed Scheme would therefore result in: ▪ A net loss of 0.19 area habitat units, with a predicted total net change of - 3.75%. ▪ No net gain or loss in hedgerow units. The trading rules for hedgerows, and very high and distinctiveness area habitats are met. However, trading rules for low and medium distinctiveness area habitats are not met.
Actions required to deliver BNG	There is a deficit of 0.71 area habitat units and 0.10 hedgerow units that will need to be delivered in order to achieve the BNG target of 10% net gain. To satisfy trading rules, the following habitat unit types are required: ▪ For medium distinctiveness habitats, 0.06 area habitats units of the same broad habitat as those lost (0.03 habitat units each of medium distinctiveness 'cropland' and 'grassland'), or higher distinctiveness habitat, is required. ▪ For low distinctiveness habitats, 0.13 area habitat units of any low distinctiveness or higher distinctiveness habitat is required. There are plans to plant 'individual trees' and 'native hedgerow' as part of the Proposed Scheme, with specific details of this habitat creation to be confirmed following the production of this Design Stage Assessment. To help achieve 10% BNG and satisfy trading rules, the following habitat creation is recommended:



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- The planting of 'individual trees – rural tree', as a medium distinctiveness habitat, equal to at least 0.13 area habitat units would offset the loss of low distinctiveness habitat and satisfy this trading rule. Additional tree planting could be undertaken to help achieve 10% net gain, after criteria required to meet trading rules have been met.
 - 0.10 hedgerow units are required to achieve the 10% BNG requirement for hedgerows equal to, as an example, 0.03 km of 'native hedgerow' in moderate condition.
 - If the required 0.06 area habitat units of medium distinctiveness habitats cannot be delivered either on-site or off-site, then statutory biodiversity credits will need to be purchased to satisfy this trading rule and deliver the required 10% BNG.
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1. Introduction

1.1 Terms of Reference

AtkinsRéalis has been instructed by Wiltshire Council to provide a Biodiversity Net Gain (BNG) Design Stage Assessment report in relation to a change of Lackham Roundabout to incorporate the construction of a bus turning point and bus stop (hereafter referred to as ‘the Proposed Scheme’). The Proposed Scheme is located to the east of Lackham Roundabout and the A350 carriageway to the south of Chippenham in Wiltshire (Ordnance Survey National Grid Reference (OSNGR): ST 90948 70647). The footprint of the Proposed Scheme (hereafter referred to as ‘the Application Site’) is shown on the Application Site Location Plan provided in **Appendix A**.

The British Standard BS 8683:2021¹ defines BNG as “*a specific, quantifiable outcome from project activities that deliver demonstrable benefits for biodiversity compared to the baseline situation.*” It is an approach that aims to leave the natural environment in a measurably better state than beforehand.

This report is intended to form part of the Proposed Scheme’s planning application submission to Wiltshire Council (for full planning consent under the Town and Country Planning Act 1990) in relation to meeting the biodiversity gain objective (the ‘biodiversity gain condition’) under the statutory framework for BNG. The mandatory BNG objective is for developments to deliver at least a 10% in biodiversity value relative to the pre-development biodiversity value of a development site. The biodiversity value can be achieved through on-site biodiversity gains, registered off-site biodiversity gains or statutory biodiversity credits.

The report provides an assessment of changes in biodiversity, as a result the Proposed Scheme, from a pre-development baseline to a post-development scenario. It follows the framework set out by the Chartered Institute of Ecology and Environmental Management (CIEEM)² for reporting in relation to BNG assessments. The assessment has been undertaken by a competent person with reference to the British Standard BS 8683:2021¹.

1.2 The Application Site

The Application Site is located south of Chippenham, Wiltshire, at OSNGR ST 90948 70647.

The Application Site is approximately 1.31 ha in area and is comprised primarily of grassland and cropland with areas of scrub. A single lane tarmac road branches from Lackham Roundabout and extends through the south-west of the Application Site where this is the existing road entrance to Lackham College.

Within this report, any use of the term ‘on-site’ refers to the Application Site as described above, i.e. all land within the planning red line boundary of the Proposed Scheme. Any reference to ‘off-site’ is to any land outside of the Application Site (regardless of proximity or ownership), which may be considered in the assessment if meeting the BNG objective cannot be achieved through gains within the Application Site.

¹ The British Standards Institution (2021). BS 8683:2021 Process for designing and implementing Biodiversity Net Gain – Specification. BSI Standards Limited 2021.

² CIEEM (2021). Biodiversity Net Gain Report and Audit Templates. Chartered Institute of Ecology and Environmental Management, Winchester, UK.



1.3 The Proposed Scheme

The Proposed Scheme is for a change in layout of Lackham Roundabout to include a bus turning point and bus stop to the east of the roundabout. The bus turning point will be constructed to allow for safe transit of students travelling to Lackham College.

The details of the Proposed Scheme, as they are currently understood, are shown in the General Arrangement Plan in **Appendix A**.

The Proposed Scheme requires full planning consent.

It is understood that there will be no trees felled to accommodate for the bus turning point, and works will be kept under low level impacts with lighting maintained at a minimum. It is currently estimated that the construction programme for the Proposed Scheme will be approximately three months in length, starting in the summer 2026, and will be operational by October.

1.4 Relevant Legislation and Policy

1.4.1 Legislation

The Environment Act was given royal assent in November 2021. This is an act to make provision about targets, plans and policies in relation to the environment, including Part 6 of the Environment Act 2021 'nature and biodiversity', which allows for biodiversity gain in planning.

In England, Schedule 14 of the Environment Act 2021 makes provision for a 10% biodiversity gain to be a condition of planning permission through amendment of the Town and Country Planning Act 1990. It also makes provision for habitat creation and enhancements to deliver biodiversity gain to be maintained for a period of at least 30 years after the development is completed. Schedule 14 of the Environment Act 2021 was brought into force in 2024; BNG is now mandatory under Schedule 7A of the Town and Country Planning Act 1990 for most types of development. A summary of relevant BNG legislation is provided in **Appendix B**.

The Proposed Scheme is within the scope of mandatory BNG.

Wiltshire Council, as a public body, has a duty to conserve biodiversity under Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 (as amended).

The introduction of the Environment Act 2021 strengthens this biodiversity duty by amending Section 40 of the Act 2006 so that public bodies also have a duty to enhance biodiversity. Public bodies must now:

- Consider what they can do to conserve and enhance biodiversity.
- Agree policies and specific objectives based on their consideration.
- Act to deliver their policies and achieve their objectives.



1.4.2 Policy

1.4.2.1 National Policy

The National Planning Policy Framework (NPPF)³ “provides a framework within which locally-prepared plans can provide for housing and other development in a sustainable manner”. It emphasises the importance of protecting and enhancing the natural environment. In relation to BNG, the NPPF states the following:

- Paragraph 187 (d) *Planning policies and decisions should contribute to and enhance the natural and local environment by:*
 - 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.*
- Paragraph 192 (b) *To protect and enhance biodiversity and geodiversity, plans should:*
 - *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 193 (d) *When determining planning applications, local planning authorities should apply the following principles:*
 - *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.*

1.4.2.2 Local Policy

At present, there are no net gain targets above 10% set within Wiltshire Council's Core Strategy⁴ and there is no policy wording which creates substantive changes from the statutory framework for BNG.

1.5 Scope of the Assessment

Biodiversity metrics provide a way of measuring and accounting for biodiversity losses and gains resulting from development and/or land management change.

This BNG Design Stage Assessment quantifies the baseline biodiversity value of land within the Application Site (using habitat as a proxy and measured in biodiversity units), quantifies the habitats to be lost, retained and/or enhanced, and predicts the post-development biodiversity units to be delivered as part of the Proposed Scheme. The assessment is based on the proposed General Arrangement Plan (see **Appendix A**) available at the time of assessment (June 2026).

³ Ministry of Housing, Communities & Local Government (2024). *National Planning Policy Framework*. MHCLG, December 2024.

⁴ Wiltshire Council (2015). Wiltshire Core Strategy [Online]. Available at: <https://www.wiltshire.gov.uk/planning-policy-core-strategy> [Accessed June 2026].



The Statutory Biodiversity Metric⁵, hereafter referred to as ‘the Metric’, has been used to calculate biodiversity units and measure the change in biodiversity at the Application Site, as a result of the Proposed Scheme.

The Metric sets out four rules that must be followed in applying the Metric; BNG cannot be claimed if the rules are not followed. Where appropriate to the assessment, these rules are discussed in the relevant sections of this report.

This Design Stage Assessment is intended as an early indicator to highlight where design is positive and where design needs to be altered.

The scope of this assessment is intended to advise Wiltshire Council on any alterations to the design of the Proposed Scheme in order to meet the BNG objectives under the statutory framework for BNG. This can be through on-site biodiversity gains, registered off-site biodiversity gains or statutory biodiversity credits. It will be used to inform the BNG Plan, which will need to be submitted and approved by Wiltshire Council before commencement of the Proposed Scheme.

This document must be read with “*The Statutory BNG Metric - Lackham Roundabout*”.

⁵ GOV.UK (2024). Statutory biodiversity metric tools and guides [online]. Available at: <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides#full-publication-update-history> [Accessed May 2026].

2. Methods

2.1 Desk Study

2.1.1 Irreplaceable Habitats, Protected Sites and Priority Habitats

A desk study was undertaken on 27 May 2026 to inform the Ecological Impact Assessment (EclA)⁶ of the Proposed Scheme. In relation to this BNG Design Stage Assessment, the desk study was used to identify any important ecological features (e.g. irreplaceable habitats, statutory designated nature conservation sites, priority habitats), which may influence the feasibility of delivering BNG, within and adjacent to the Application Site.

To identify any of these features, the following online data sources were accessed:

- Multi-Agency Geographic Information for the Countryside (MAGIC)⁷
- Ancient Tree Inventory⁸

2.1.1.1 Irreplaceable Habitats

Impacts to irreplaceable habitats are not adequately measured by the Metric and they require separate consideration outside of the statutory framework for BNG, which complies with relevant policy, legislation and regulations. The statutory biodiversity gain objective is not applied to losses or deterioration of irreplaceable habitat. The list of irreplaceable habitats considered within the statutory framework for BNG, as set out in the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024, is provided in **Table B-1**.

2.1.1.2 Protected Sites

Development on statutory designated sites for nature conservation (e.g. Sites of Special Scientific Interest) is not exempt from the statutory biodiversity gain objective. However, development needs to be compliant with relevant policy and guidance to prevent BNG being used as a justification for otherwise unacceptable development on such sites, i.e. there needs to be strict adherence to the mitigation hierarchy and development will not be consented on the justification that habitat losses can be easily offset using the BNG approach.

2.1.1.3 Priority Habitats

The NPPF³ promotes the conservation, restoration and enhancement of priority habitats. These are habitats that have been deemed to be of principal importance for the purpose of conserving biodiversity and have been identified as such by being listed on Section 41 of the NERC Act 2006; Wiltshire Council will take their presence into account in their planning decision making.

⁶ AtkinsRealis (2026). Ecological Impact Assessment: Lackham Roundabout.

⁷ DEFRA (2024). MAGIC Map Application [online]. Available at: <https://magic.defra.gov.uk/MagicMap.html> [Accessed May 2026].

⁸ Woodland Trust (2025). Ancient Tree Inventory – Woodland Trust [online]. Available at: <https://ati.woodlandtrust.org.uk/> [Accessed May 2026].



2.1.2 Strategic Significance

The Metric applies a strategic significance multiplier based on whether the location of a site and/or the baseline habitats present within a site or proposed habitat interventions have been identified as being locally important for biodiversity. The relevant Local Nature Recovery Strategy (LNRS) should be used to assign strategic significance of the Application Site and/or habitats within the Application Site.

Wiltshire Council has published its LNRS that was approved and made publicly available in October 2025 under the name 'The Wiltshire and Swindon LNRS'⁹. The LNRS sets out 24 priorities for nature recovery: nine strategically mapped habitat priorities, nine species priorities, and six countryside priorities that apply across all landscapes. These are guided by the Lawton Review principle of making habitats “*bigger, better, and more joined up*” ensuring that action focuses where it will achieve the greatest ecological benefits.

As the Wiltshire and Swindon LNRS has been formally adopted and published, the application of strategic significance has followed the descriptions set out in Table 7 of the Metric's User Guide⁵.

2.2 Baseline Conditions

A field survey to record habitat types was undertaken on 12/05/2026. The survey comprised identifying the habitats present within the Application Site, using the classification system that the Metric predominantly uses in the area habitat module and the hedgerow module (the UK Habitat Classification (UKHab)¹⁰), and undertaking condition assessments of the habitats. Condition assessment scores were assigned using professional judgement and the criteria for habitat in 'good', 'moderate', or 'poor' condition as set out in the relevant condition assessment sheets in Technical Annex 1 of the Metric⁵.

The survey was led by a suitably experienced AtkinsRéalis ecologist with a Level 4 Field Identification Skills Certificate (FISC) and who has appropriately evidenced their competency as being capable in the identification of habitats and plant species in accordance with the CIEEM Competency Standard for Preliminary Habitat Survey¹¹. Surveyors ensured that any habitats considered to be irreplaceable, including ancient and veteran trees, (see **Table B-1**) were identified and recorded.

The survey data was collected using ESRI ArcGIS FieldMaps and then exported and analysed using QGIS. GIS specialists processed the habitat mapping data to remove small overlaps and gaps between polygons that result from digitising at low resolution. The habitat survey data was then clipped to exclude habitat data outside of the Application Site boundary. Using QGIS, areas (measured in ha) were calculated for each area habitat feature and, where present, lengths (measured in km) were calculated for hedgerow and watercourse features. Habitat parcels were then created, linking areas/lengths of habitat of the same distinctiveness, condition and strategic significance.

To calculate the area of any individual trees within the Application Site, the 'tree helper' tool embedded within the Metric was utilised. This tool calculates the projected area of individual trees according to their size (small, medium, or large) measured as 'diameter at breast height' (i.e. diameter measured at 1.5 m above ground).

The method for assigning baseline strategic significance is set out in **Section 2.1.2**.

⁹ Wiltshire Council (2025). Local Nature Recovery Strategy for Wiltshire and Swindon [Online]. Available at:

<https://www.wiltshire.gov.uk/article/8288/Wiltshire-and-Swindon-Local-Nature-Recovery-Strategy> [Accessed May 2026].

¹⁰ UKHab Ltd (2023). UK Habitat Classification Version 2.0 [Online]. Available at: <https://www.ukhab.org> [Accessed May 2026].

¹¹ CIEEM (2023). Competency Standard for Preliminary Habitat Survey Version 2 [online]. Available at: <https://cieem.net/wp-content/uploads/2023/03/Preliminary-Habitat-Survey-Competency-Standard-V2-February-2023.pdf> [Accessed May 2026].

2.3 Proposed Design

The proposed General Arrangement Plan (see **Appendix A**) has been used to assess the post-development scenario. These plans were converted from CAD software to a QGIS environment where it was overlaid on the baseline habitat data. Areas and lengths of proposed design features, including built development and habitat creation and/or habitat retention/enhancement, were calculated using QGIS. The GIS shapefiles were inspected for any overlaps, gaps, or duplications, and all polygons and lines were snapped correctly, in order to correctly represent the area or length of each habitat type.

The proposed design features were translated to appropriate Metric habitat types and target condition scores were assigned based on the realistic likelihood of achieving the target condition.

2.4 Calculating BNG Units using the Metric

The Metric uses several measures to quantify baseline biodiversity value for each habitat type within a site boundary. These measures include the habitat's distinctiveness (a measure based on the type of habitat and its distinguishing features), its condition (a measure of the habitat against its ecological optimum state) and its size (ha for area habitat/km for linear habitat). In addition, the local strategic significance of a site and/or the habitats within it is taken into account by applying a strategic significance multiplier.

Area habitat units, hedgerow units and watercourse units are calculated in separate modules of the Metric. Rule 2 of the Metric states *"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."*

A habitat's distinctiveness score is derived from its intrinsic biodiversity value, reflecting species richness and rarity, the extent to which it is protected by designations and the degree to which it supports species rarely found elsewhere. This score is pre-assigned in the Metric.

The calculation of watercourse units includes additional multipliers that take into account whether a watercourse has been modified by built development through the presence of encroachment into the watercourse channel or riparian zone, i.e. the multipliers reduce the number of watercourse units to reflect the negative impact that such encroachment has on a naturally functioning river system.

Post-development biodiversity units are calculated the same way but with the addition of temporal and risk multipliers that take into account the average time it takes between starting habitat creation or enhancement and that habitat reaching its target distinctiveness or condition (time to target condition) and the difficulty¹² in creating or enhancing habitat. These temporal and risk related multipliers are set within the Metric and cannot be changed. Where habitat creation or enhancement is off-site, biodiversity units are calculated the same way but a spatial risk multiplier is applied based on the distance of the off-site habitat creation or enhancement to the on-site habitat loss.

The Metric also takes into account whether habitat creation or enhancement is delivered in advance of any impact it is compensating for or whether there will be any significant delay in an intervention relative to the impact. If taken into account, the standard temporal multiplier is adjusted accordingly.

¹² A measure which represents the uncertainty in the effectiveness of management techniques used to enhance or create habitat.

To calculate the overall net change in biodiversity units, the baseline biodiversity units are subtracted from the post-development biodiversity units, as shown in **Figure 2-1**.

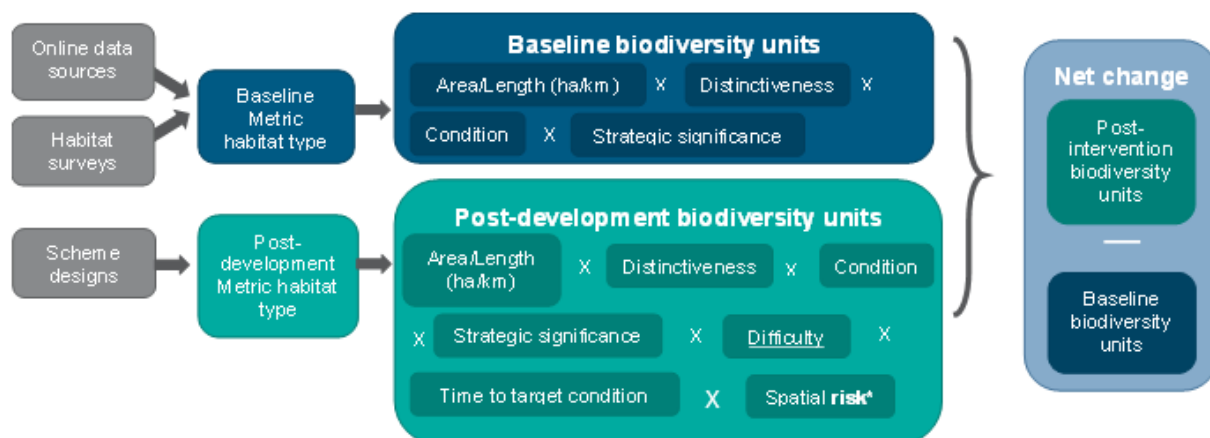


Figure 2-1 – Calculation of Biodiversity Units using the Metric

NB. Illustration does not fully depict calculation of watercourse units; additional multipliers taking into account watercourse and riparian encroachment are applied.

Text underlined indicates a risk factor applied when creating or enhancing habitats.

*Applies to off-site habitat interventions only.

There are no watercourse features within the Application Site; therefore, only the area habitat and hedgerow modules of the Metric have been used in this assessment.

2.5 Trading Rules

Rule 1 of the Metric states “*The trading rules of this biodiversity metric must be followed*”. The trading rules set minimum habitat creation and enhancement requirements to compensate for specific habitat losses, up to the point of no net loss. They are based on the habitat type and distinctiveness of the lost habitat. The trading rules are set out in **Table 2-1**.

Table 2-1 – Habitat Trading Rules

Baseline habitat distinctiveness	Area habitat	Hedgerow
Very high	Priority should be given to replacing losses with area habitat units of the same habitat type (bespoke compensation likely to be required)	Losses must be replaced with hedgerow units of the same habitat type
High	Losses must be replaced with area habitat units of the same habitat type	Losses must be replaced with hedgerow units of the same habitat type or of a higher band
Medium	Losses must be replaced by area habitat units of either medium band habitats within the same broad habitat type or, any habitat from a higher band from any broad habitat type	Losses must be replaced with hedgerow units of the same or of a higher band

Baseline habitat distinctiveness	Area habitat	Hedgerow
Low	Losses must be replaced with area habitat units of the same or higher band	Losses must be replaced with hedgerow units of the same or of a higher band
Very low	Not applicable	Losses must be replaced with hedgerow units of the same or of a higher band

2.6 BNG Principles, Mitigation Hierarchy and Biodiversity Gain Hierarchy

Use of the Metric is underpinned by several principles. Amongst these, Principle 3 states “*This biodiversity metric should be used in accordance with established good practice guidance and professional codes*”. To claim BNG, evidence that demonstrates a project has clearly applied all ten of the good practice principles for achieving BNG¹³ (see **Appendix C**) must be provided. Adhering to all principles together underpins the good practice required for achieving and sustaining BNG.

Expanding on Principle 1 of the good practice principles for achieving BNG, the mitigation hierarchy (see **Appendix C**) and the avoidance of impacts to irreplaceable habitats must be applied when committing to achieving BNG. This is reinforced through the publication of the British Standard BS 8683:2021¹. Application of the mitigation hierarchy is encouraged by the Metric because BNG can be more easily achieved by avoiding the loss of habitat through either retention or enhancement. Principle 2 of the Metric adds “*The use of this biodiversity metric does not override existing biodiversity protections, statutory obligations, policy requirements, ecological mitigation hierarchy or any other requirements. This includes consenting or licensing processes, for example woodlands.*”

In determining whether to approve the BNG Plan, a planning authority must take into account how the Biodiversity Gain Hierarchy (see **Appendix C**) will be followed, and any reasons where it cannot be followed. It is distinct from the mitigation hierarchy and has been designed to reflect the habitat types within the Metric and the ways that the statutory biodiversity gain objective can be achieved. The planning authority will take into account how it has been applied in their planning decision making and whether to approve the BNG Plan.

2.7 Assumptions and Limitations

It is understood that the Proposed Scheme will be completed within a 3-month window. Therefore, there is not considered to be a delay of greater than one year in any of the habitat creation, and as such a temporal multiplier to account for any delays in starting habitat creation has not been applied.

It is assumed that an appropriate Habitat Management and Monitoring Plan (HMMP) will be implemented for the duration of the maximum time for the habitat creation and enhancement proposals to reach their target condition and to give surety that the Proposed Scheme will deliver the predicted net gain in biodiversity units. It is then assumed that the habitats will be subject to suitable management for a minimum of 30 years.

The desk study search for irreplaceable habitats (including ancient and veteran trees) and priority habitats used online sources as set out in **Section 2.1.1**. These datasets are not entirely accurate and some irreplaceable or

¹³ CIEEM, CIRIA, IEMA (2016). Biodiversity Net Gain: Good practice principles for development.

priority habitats that may be present within the Application Site may not be present in the datasets. The field survey aimed to search for these features; as such, this is not considered to be a significant constraint.



3. Baseline Conditions

3.1 Desk Study

3.1.1 Irreplaceable Habitats, Protected Sites and Priority Habitats

A full list of habitats and sites identified near to the Application Site is provided in the EcIA report. Potential impacts of the Proposed Scheme were considered on these habitats and sites to assess any effects likely to arise. Habitats and sites were then scoped either in or out of further consideration. BNG considers only sites or habitats that are included within the Application Site.

No irreplaceable habitats, protected sites or priority habitats were identified through the desk study within the boundary of the Application Site.

3.1.2 Strategic Significance

As the Wiltshire and Swindon LNRS has been formally adopted and published, all baseline habitats within the Application Site have been classified as low strategic significance.

3.2 Pre-Development Biodiversity Value

The following Sections summarise, for each module (area habitat and hedgerow), the pre-development biodiversity value of the Application Site. Field survey data to inform the Metric calculations was collected on 12/05/2026. There is no indication that unauthorised activities have been undertaken at the Application Site between the date of survey and issue of this report which may have resulted in degradation of on-site habitats. The pre-development biodiversity value is considered to be accurate for the date of the survey (12/05/2026) and is relevant to the date of the planning application.

3.2.1 Area Habitat Baseline

The area habitat baseline of the Application Site is summarised in **Table 3-1**. The area habitat features present within the Application Site are shown on the Habitat Baseline Plan provided in **Appendix D**. Condition assessment sheets, where required, are provided in **Appendix E**. These provide summary descriptions of the area habitat features present and the results of their condition assessment. Photographs of the habitats are provided in **Appendix F**.



Table 3-1 – Area Habitat Baseline

Habitat parcel reference	Broad habitat	Habitat type	Irreplaceable habitat?	Area (ha)	Distinctiveness	Condition	Strategic significance	Area habitat units
A3	Cropland	Arable field margins tussocky (<i>priority habitat</i>)	No	0.116	Medium	Condition Assessment N/A	Low	0.46
A5	Cropland	Temporary grass and clover leys	No	0.792	Low	Condition Assessment N/A	Low	1.58
A1, A6, A9, A10 and A11	Grassland	Other neutral grassland	No	0.19	Medium	Poor	Low	0.76
A12 and A13	Urban	Introduced shrub	No	0.005	Low	Condition Assessment N/A	Low	0.01
A2	Heathland and shrub	Blackthorn scrub	No	0.081	Medium	Good	Low	0.97
A4	Heathland and shrub	Blackthorn scrub	No	0.020	Medium	Moderate	Low	0.16
A7	Urban	Developed land; sealed surface	No	0.085	Very low	N/A - Other	Low	0.00
A8	Urban	Bare ground	No	0.020	Low	Poor	Low	0.04
N/A	Individual trees	Rural tree	No	0.037	Medium	Good (<i>1 large tree</i>)	Low	0.44
N/A	Individual trees	Rural tree	No	0.090	Medium	Moderate (<i>2 medium and 14 small trees</i>)	Low	0.72
N/A	Individual trees	Rural tree	No	0.004	Medium	Poor (<i>1 small tree</i>)	Low	0.02



Habitat parcel reference	Broad habitat	Habitat type	Irreplaceable habitat?	Area (ha)	Distinctiveness	Condition	Strategic significance	Area habitat units
Total habitat area (ha)				1.44				
Total site area (ha, excluding area of individual trees)				1.31				
Total habitat units								5.16



3.2.2 Hedgerow Habitat Baseline

The hedgerow baseline of the Site is summarised in **Table 3-2**. The linear hedgerow features present within the Application Site are shown on the Habitat Baseline Plan in **Appendix D**.

Table 3-2 – Hedgerow Habitat Baseline

Habitat parcel reference	Hedgerow type	Length (km)	Distinctiveness	Condition	Strategic significance	Hedgerow habitat units
H1	Native hedgerow with trees (<i>priority habitat</i>)	0.124	Medium	Moderate	Low	0.99
Totals		0.124				0.99



4. Proposed Design

The proposed design used in this assessment is based on the General Arrangement Plan (see **Appendix A**).

The following sections summarise the habitat intervention proposals, which have taken into account the BNG Good Practice Principles, the mitigation hierarchy and the biodiversity gain hierarchy. **Section 5.4** summarises the BNG Good Practice Principles and highlights how each have been met and considered for the Proposed Scheme.

The post-development design, illustrated using the Metric habitat types, is shown on the Proposed Habitats Plan provided in **Appendix G**.

4.1 Habitat Retention, Enhancement and Loss

The Proposed Scheme has maximised, where possible, the retention of habitats within the Application Site. Based on the Proposed Scheme, there will be an area of 1.22 ha of retained area habitat equalling 3.78 habitat units (not including areas of individual trees). It is proposed that all individual trees and native hedgerow within the Application Site are to be retained. Therefore, on the basis of no trees being felled, there will be an equivalent area of 0.13 ha retained area habitat equalling 1.17 area habitat units. The 0.12 km of 'native hedgerow with trees' will be retained equalling 0.99 hedgerow units. There are currently no plans to enhance any of the area or hedgerow habitats within the Application Site.

The Proposed Scheme results in a total loss of 0.09 ha of area habitats equal to 0.21 area habitat units, where this includes a loss of 0.01 ha of 'arable field margins tussocky' (0.03 habitat units), 0.07 ha of 'temporary grass and clover leys' (0.14 habitat units), 0.01 ha of 'other neutral grassland' (0.03 habitat units), and 0.01 ha of bare ground (0.01 habitat units).

4.1.1 Area Habitat Retention and Loss

A summary of area habitat retention¹⁴ and loss is provided in **Table 4-1**.

Table 4-1 – Area Habitat Retention and Loss

Habitat parcel reference	Habitat type	Condition	Area retained (ha)	Baseline habitats units retained	Area lost (ha)	Baseline habitat units lost
A3	Arable field margins tussocky	Condition Assessment N/A	0.108	0.43	0.008	0.03
A5	Temporary grass and clover leys	Condition Assessment N/A	0.723	1.45	0.069	0.14
A1, A6, A9, A10 and A11	Other neutral grassland	Poor	0.183	0.73	0.006	0.03
A12 and A13	Introduced shrub	Condition Assessment N/A	0.005	0.01	0.000	0.00
A2	Blackthorn scrub	Good	0.081	0.97	0.000	0.00
A4	Blackthorn scrub	Moderate	0.020	0.16	0.000	0.00
A7	Developed land; sealed surface	N/A - Other	0.085	0.00	0.000	0.00
A8	Bare ground	Poor	0.013	0.03	0.007	0.01
N/A	Rural tree	Good	0.037	0.44	0.000	0.00
N/A	Rural tree	Moderate	0.090	0.72	0.000	0.00
N/A	Rural tree	Poor	0.004	0.02	0.000	0.00

¹⁴ Habitat retention is when there is no loss of habitat, when habitat is retained in its baseline condition, and when there is no action to enhance the habitat.

Habitat parcel reference	Habitat type	Condition	Area retained (ha)	Baseline habitats units retained	Area lost (ha)	Baseline habitat units lost
Totals			1.35	4.95	0.09	0.21

4.1.2 Hedgerow Habitat Retention and Loss

A summary of hedgerow habitat retention and loss is provided in **Table 4-2**.

Table 4-2 – Hedgerow Habitat Retention and Loss

Hedgerow reference	Hedgerow type	Length retained (km)	Baseline units retained	Length lost (km)	Baseline units lost
1	Native hedgerow with trees	0.124	0.99	0.000	0.00
Totals		0.124	0.99	0.00	0.00

4.2 Proposed Habitat Creation

Wiltshire Council will be undertaking habitat creation involving the planting of ‘individual trees – rural tree’ and ‘native hedgerows’; however, these have not yet been included in any specific detailed design and have therefore not been included in this Design Stage Assessment. It is the intention that the habitat losses as a result of the Proposed Scheme as detailed within this assessment will be used to inform their habitat creation and landscape plans in order to achieve statutory 10% BNG. The only vegetated habitat creation currently shown in the General Arrangement Plan is the small area within the centre of the roundabout which is an area of topsoil/ seeded area with associated attenuation drainage; this has been assumed to be ‘modified grassland’ in moderate condition, where the assumptions for realistic target condition scores are outlined below in **Table 4-3**.

Table 4-3 – Habitat Creation Proposals

Habitat type and target condition	Condition assessment criteria	Criteria assumptions
Grassland – modified grassland in moderate condition	A. There are 6-8 vascular plant species per m ² present, including at least 2 forbs. <i>Note - this criterion is essential for achieving Moderate or Good condition.</i>	Yes – it is recommended this be sown with a more species-rich grassland mix in order to achieve 6-8 species per m ² and thus obtain at least moderate condition.
	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.	No – will likely be regularly mown keeping sward height short.
	C. Any scrub present accounts for less than 20% of the total grassland area. (Some scattered scrub such as bramble may be present).	Yes – small area so an absence of scrub with management is likely.
	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.	Yes – unlikely to be any physical damage other than the mowing regime.
	E. Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens).	No – unlikely to be any bare ground.
	F. Cover of bracken is less than 20%.	Yes – small area so an absence of bracken likely.
	G. There is an absence of invasive non-native plant species.	Yes – assumed that seed mix will not contain >5% cover of undesirable species and that appropriate management will control physical damage and INNPS colonisation.

4.2.1 Area Habitat Creation Proposals

A summary of the area habitat units delivered by the habitat creation proposals is provided in **Table 4-4**.

Table 4-4 – Area Habitat Creation Proposals

Habitat parcel reference	Broad habitat	Proposed habitat	Area (ha)	Distinctiveness	Condition	Strategic significance	Habitat units delivered
A14 and A15	Urban	Developed land; sealed surface	0.086	Very low	N/A - Other	Low	0.00
A16	Grassland	Modified grassland	0.005	Low	Moderate	Low	0.02
Total habitat area (ha)			0.09				
Total habitat units delivered							0.02

4.2.2 Strategic Significance

From a review of the Wiltshire and Swindon LNRS interactive Local Habitat Map¹⁵, no areas within the Application Site where potential measures for creating or improving habitat have been mapped and which have been stated as having BNG strategic significance were identified. Therefore, all post-development habitat intervention proposals have been classified as low strategic significance.

¹⁵ Wiltshire and Swindon Local Nature Recovery Strategy: Interactive Habitat Map [Online]. Available at: <https://experience.arcgis.com/experience/2b3a19902e3e4b81bac90326a2a2dec5/page/Interactive-map> [Accessed May 2026].

5. BNG Metric

5.1 Habitat Trading

The following section identifies whether the Metric's habitat trading rules have been met.

5.1.1 Area Habitat

5.1.1.1 Very High and High Distinctiveness Habitat

The Proposed Scheme will not result in the loss of any very high or high distinctiveness area habitats.

5.1.1.2 Medium Distinctiveness Habitat

The Proposed Scheme will currently result in the net loss of 0.06 units of medium distinctiveness area habitat. This comprises 0.03 habitat units of the medium distinctiveness broad habitat 'grassland', and 0.03 units of the medium distinctiveness broad habitat 'cropland'. Therefore, the trading rules for medium distinctiveness area habitats are not satisfied.

5.1.1.3 Low Distinctiveness Habitat

The Proposed Scheme will currently result in the net loss of 0.13 units of low distinctiveness area habitat. There is predicted to be a loss of 0.14 area habitat units of 'temporary grass and clover leys' and 0.01 area habitat units of 'bare ground', with only 0.02 habitat units gained from the creation of a small area of 'modified grassland' in assumed moderate condition. Therefore, the trading rules for low distinctiveness area habitats are not satisfied.

5.1.2 Hedgerow

The Proposed Scheme will not result in the loss of any hedgerow.

5.2 Headline Results

Using the Metric, the Application Site has the following pre-development biodiversity unit values:

- Area habitat units: 5.16
- Hedgerow habitat units: 0.99

The proposed design (habitat retention and creation) is predicted to deliver:

- Area habitat units: 4.97
- Hedgerow habitat units: 0.99

The assessment shows that the Proposed Scheme is predicted to result in:

- A net loss of 0.19 habitat units, with a total net change of – 3.75%.



- No net gain or net loss of hedgerow units, as the only hedgerow is to be retained, with no current proposals for hedgerow enhancement or creation.

The Proposed Scheme does not currently deliver on-site biodiversity gains in area habitat or hedgerow units to meet the statutory 10% BNG requirement. Moreover, the trading rules for medium and low distinctiveness area habitats are not satisfied.

5.3 Actions Required to Deliver BNG

To meet the required statutory 10% BNG, there is a deficit of 0.71 area habitat units and 0.10 hedgerow units which will need to be accounted for. As part of the overall deficit of area habitat units, in order to satisfy trading rules there are a number of criteria that must be met:

- For the medium distinctiveness habitats, 0.03 habitat units of any medium distinctiveness cropland habitat and 0.03 habitat units of any medium distinctiveness grassland habitat are required. Alternatively, 0.06 created habitat units of any high or very high distinctiveness habitat would also satisfy this trading rule.
- For the low distinctiveness habitats, 0.13 area habitat units of any low distinctiveness or higher distinctiveness habitat is required.

It is currently proposed by Wiltshire Council that 'individual trees – rural tree' and 'native hedgerow' habitat creation will be undertaken within the Application Site, with specific design details of this habitat creation currently unconfirmed. In order to help achieve 10% net gain and meet the required trading rules, the following on-site habitat creation proposals are recommended:

- The planting of 'individual trees – rural tree', as a medium distinctiveness habitat, equal to at least 0.13 area habitat units would offset the loss of the 0.13 area habitat units of low distinctiveness habitat, where for example this would be equal to 11 small trees in moderate condition. Additional tree planting above this number could be undertaken to help achieve 10% net gain, after criteria required to meet trading rules have been met.
- To achieve the 10% BNG requirement for hedgerows, 0.10 hedgerow habitat units are required which would equate to, for example, the planting of a minimum of 0.03 km of 'native hedgerow' in moderate condition. However, as the existing 'native hedgerow with trees' is on the northern edge of the Application Site boundary and will not be impacted by the Proposed Scheme, a sensible approach would be to alter the Application Site boundary so that the 'native hedgerow with trees' is outside of the Application Site and would not be included in the baseline habitats of the Application Site; therefore, there would be no requirement for any additional 'native hedgerow' planting to achieve 10% net gain.

If the required 0.03 habitat units of medium distinctiveness cropland habitat and 0.03 habitat units of medium distinctiveness grassland habitat cannot be created either on-site or from purchasing off-site units, then statutory biodiversity credits will need to be purchased. As it is a last resort, the requirement to purchase statutory biodiversity credits will need to be proved by:

- Evidencing why on-site BNG was not possible.
- Evidencing that three local or national off-site unit suppliers, habitat banks or trading platforms have been approached and that insufficient off-site options are available¹⁶.

A BNG Plan will be submitted and approved by Wiltshire Council before commencement of the Proposed Scheme.

¹⁶ If the Proposed Scheme needs less than 0.25 biodiversity units (area or linear), the applicant can buy statutory credits without following this step.

The BNG Plan will:

- Demonstrate how the Proposed Scheme will meet the statutory BNG requirements.
- Provide evidence of the decisions made in this BNG assessment.

A HMMP will also be produced if the Proposed Scheme relies on off-site biodiversity gains. The HMMP will detail the measures required to ensure the habitat creation and enhancement proposals reach their target condition and give confidence that every effort will be made to enable the Proposed Scheme to deliver the predicted biodiversity units.

An HMMP may also be required if Wiltshire Council deem that any on-site biodiversity gains are 'significant enhancements'; this can include the creation or enhancement of habitats of medium or higher distinctiveness.

5.4 BNG Principles, Mitigation Hierarchy and Biodiversity Gain Hierarchy

Table 5-1 provides evidence of how the design of the Proposed Scheme has adhered to good practice principles for delivering BNG.

Table 5-1 – BNG Good Practice Principles achieved by the Proposed Scheme

Principle	Justification that the principle has been met
1. Apply the mitigation hierarchy	Loss of habitats has been minimised as far as possible and where land changes are required, the Proposed Scheme has targeted changes to low distinctiveness habitats before higher distinctiveness habitats. Habitat retention has ensured that all 'individual trees', 'native hedgerow' and 'blackthorn scrub' have been retained.
2. Avoid losing biodiversity that cannot be offset by gains elsewhere	The Proposed Scheme avoids impacts on irreplaceable habitats. None of these habitats are present within the Application Site and therefore will not be affected or lost as a result of the Proposed Scheme.
3. Be inclusive and equitable	This Design Stage Assessment is intended as an early indicator to highlight where design is positive and where design needs to be altered.
4. Address risks	A precautionary principle has been adopted in relation to the conclusions of the EcIA and further effort is proposed by avoidance and mitigation for the constraints identified. The survey was conducted in the optimal season for recording habitats and plant species so this eliminates the risk of under recording the baseline habitats.
5. Make a measurable net gain contribution	On-site BNG has been maximised where possible with most habitats being retained. Currently, there is a net loss of area habitat units, although the final habitat creation is yet to be confirmed, which will include on-site planting of 'individual trees' and 'native hedgerows' to offset some of the lost area habitats and to help meet habitat trading rules.
6. Achieve the best outcomes for biodiversity	The Proposed Scheme is constrained by the area of the Application Site but this assessment encourages conversations for how best to use the Application Site to achieve BNG.
7. Be additional	The habitat creation interventions will be additional and would not otherwise be delivered without the Proposed Scheme.



Principle	Justification that the principle has been met
8. Create a net gain legacy	The final Design Stage BNG assessment will aim to secure guarantees of long-term management of the habitats through an HMMP.
9. Optimise sustainability	The Proposed Scheme is for a new bus stop and turning point to be constructed to allow for the safe transit of students to Lackham College via a more sustainable mode of transport. The additional planting of 'individual trees' and 'native hedgerows' would also help to improve the air quality and recreation of the Proposed Scheme, for example.
10. Be transparent	This assessment is to be shared with the whole design team and intended to make designers and stakeholders aware of the BNG process, including potential results of current plans so that likely outcomes are known and time is created for changes to design to maximise BNG gains.

APPENDICES

Appendix A. Proposed Scheme Plans



Figure A-1 – Application Site Location Plan

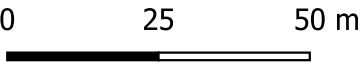




AtkinsRéal

Legend:

Application Site Boundary



Original Scale: 1:2,000		Version: 1.0
Base Mapping: © Google Satellite Imagery		
AtkinsRéal UK Limited © 200 Woodcote Grove, Ashley Road, Epsom, Surrey KT18 5BW		
Client: Wiltshire Council		
Project: Lackham Roundabout		
Job No: 100130925		
Title: Application Site Location Plan		
Drawn by: TW Date: 30/06/26	Checked by: RB Date: 02/07/26	Reviewed by: NC Date: 03/07/26

Figure A-2 – General Arrangement Plan





NOTES:

- Pre-cast concrete Kerb Type HB2
- Pre-cast concrete edging Type EF
- Full depth carriageway construction
- Full depth footway construction
- Topsoil / Seeded area
- 'Arun' 2 bay bus RTPi shelter, full end panel.

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Wiltshire Council (100049050) 2024

F					
E					
D					
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A					
O	2024	MJR	GTR	GTR	ORIGINAL
REV	DATE	DRAWN	CHECK	APPRV	DESCRIPTION

DRAWING PURPOSE:

DRAFT

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Traffic & Network Management

County Hall, Bythesea Road, Trowbridge
Wiltshire, BA14 8JD
Tel: 0300 4560100
Website: www.wiltshire.gov.uk

PROJECT:

**LACKHAM COLLEGE, CHIPPENHAM
PROPOSED BUS DROP OFF / TURNING PROVISION**

DRAWING TITLE:

GENERAL ARRANGEMENT

SCALES:	AS SHOWN	SHEET SIZE:	A1
DRAWING No:	MR/MISC/LACKHAM/D003	REVISION:	0
FILE REF:			

Appendix B. Summary of Relevant BNG Legislation

The relevant primary legislation for the statutory framework for BNG is principally set out under Schedule 7A (Biodiversity Gain in England) of the Town and Country Planning Act 1990¹⁷, which was inserted into the 1990 Act by Schedule 14 of the Environment Act 2021¹⁸. The biodiversity gain objective (the ‘biodiversity gain condition’) under the statutory framework for BNG is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of a development site. The increase in biodiversity value can be achieved through on-site biodiversity gains, registered off-site biodiversity gains or statutory biodiversity credits.

The Levelling-up and Regeneration Act 2023¹⁹ has amended Schedule 7A of the Town and Country Planning Act 1990:

- Section 135 BNG: pre-development biodiversity value and habitat enhancement.
 - This provides a clause to ensure that habitats assessed for BNG during pre-development calculations are taken at their highest value on site prior to any proposed clearance that could have been undertaken during a previous activity (e.g., a previous planning application). This is to reduce incentives to clear habitats on potential BNG sites or off-site contributions to BNG.

The relevant secondary legislation (BNG regulations) to support the delivery of the statutory framework for BNG is summarised in **Table B-1**.

Table B-1 – Summary of BNG Regulations

Regulation	Summary
The Biodiversity Gain (Town and Country Planning) (Consequential Amendments) Regulations 2024 ²⁰	These regulations make further consequential amendments to existing primary legislation on planning, to integrate the BNG framework. These amendments include the definition of a planning authority under Schedule 7A which sets out the BNG framework.
The Environment Act 2021 (Commencement No. 8 and Transitional Provisions) Regulations 2024 ²¹	These regulations commence BNG for most types of new planning applications and provides transitional arrangements for section 73 permissions. This includes: ▪ Provision for biodiversity gain as condition of planning permission. ▪ Provision for a register of biodiversity gain sites (the ‘biodiversity gain site register’). ▪ Arrangement for the purchase of statutory credits.
The Biodiversity Gain Requirements (Exemptions) Regulations 2024 ²²	These regulations prescribe exemptions for categories of development to which BNG does not apply. This includes the following: ▪ Householder development. Development which is subject of a householder application as defined within Article 2(1) of the Town and

¹⁷ <https://www.legislation.gov.uk/ukpga/1990/8/contents>

¹⁸ <https://www.legislation.gov.uk/ukpga/2021/30/schedule/14/enacted>

¹⁹ <https://www.legislation.gov.uk/ukpga/2023/55/contents>

²⁰ <https://www.legislation.gov.uk/ukdsi/2024/9780348254419>

²¹ <https://www.legislation.gov.uk/ukdsi/2024/44/made>

²² <https://www.legislation.gov.uk/ukdsi/2024/47/contents/made>



Regulation	Summary
	Country Planning (Development Management Procedure) (England) Order 2015. - Development granted planning permission by a development order under section 59. This includes permitted development rights. - Development subject to the de minimis exemption. Development that does not impact a priority habitat and impacts less than 25 square metres (e.g. 5 m by 5 m) of habitat, or 5 metres of linear habitats such as hedgerows. - Self-build and custom build development. Development which: - consists of no more than 9 dwellings, and - is carried out on a site which has an area no larger than 0.5 hectares, and - consists exclusively of dwellings which are self-build or custom housebuilding as defined in section 1(A1) of the Self-build and Custom Housebuilding Act 2015. - Urgent Crown development granted permission under section 293A Town and Country Planning Act 1990. - Development of a biodiversity gain site. Development which is undertaken solely or mainly for the purpose of fulfilling, in whole or in part, the biodiversity gain condition which applies in relation to another development. - Development related to the high speed railway transport network. Development forming part of, or ancillary to, the high speed railway transport network comprising connections between all or any of the places or parts of the transport network specified in section 1(2) of the High Speed Rail (Preparation) Act 2013.
The Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024 ²³	These regulations amend the Town and Country Planning (Development Management Procedure) (England) Order 2015 and the Town and Country Planning (Section 62A Applications) (Procedure and Consequential Amendments) Order 2013 to include provisions in respect of applications for planning permission and the submission and determination of Biodiversity Gain Plans, as well as modifications of Schedule 7A of the Town and Country Planning Act 1990 for phased development.
The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 ²⁴	These regulations set out the modifications for irreplaceable habitat. The following habitats are considered to be irreplaceable for BNG metric calculation purposes: - Blanket bog - Lowland fens - Limestone pavements - Coastal sand dunes - Ancient woodland - Ancient trees and veteran trees

²³ <https://www.legislation.gov.uk/uksi/2024/50/contents/made>

²⁴ <https://www.legislation.gov.uk/uksi/2024/48/contents/made>

Regulation	Summary
	▪ <i>Spartina</i> saltmarsh swards ▪ Mediterranean saltmarsh scrub
The Biodiversity Gain Site Register Regulations 2024 ²⁵	These regulations allow for fees to be charged for applications to register land in the biodiversity gain site register and allows the register operator (Natural England) to issue financial penalties where false or misleading information is provided.

²⁵ <https://www.legislation.gov.uk/uksi/2024/45/contents/made>



Appendix C. BNG Principles, Mitigation Hierarchy and Biodiversity Gain Hierarchy

C.1 BNG Good Practice Principles

Table C-1 – BNG Good Practice Principles

Principle	In practice
1. Apply the mitigation hierarchy	Do everything possible to first avoid and then minimise impacts on biodiversity. Only as a last resort, and in agreement with external decision-makers where possible, compensate for losses that cannot be avoided. If compensating for losses within the development footprint is not possible or does not generate the most benefits for nature conservation, then offset biodiversity losses by gains elsewhere.
2. Avoid losing biodiversity that cannot be offset by gains elsewhere	Avoid impacts on irreplaceable biodiversity – these impacts cannot be offset to achieve No Net Loss or Net Gain.
3. Be inclusive and equitable	Engage stakeholders early, and involve them in designing, implementing, monitoring and evaluating the approach to Net Gain. Achieve Net Gain in partnership with stakeholders where possible, and share the benefits fairly among stakeholders.
4. Address risks	Mitigate difficulty, uncertainty and other risks to achieving Net Gain. Apply well-accepted ways to add contingency when calculating biodiversity losses and gains in order to account for any remaining risks, as well as to compensate for the time between losses occurring and the gains being fully realised.
5. Make a measurable net gain contribution	Achieve a measurable, overall gain for biodiversity and the services ecosystems provide while directly contributing towards nature conservation priorities.
6. Achieve the best outcomes for biodiversity	Achieve the best outcomes for biodiversity by using robust, credible evidence and local knowledge to make clearly justified choices when: ▪ Delivering compensation that is ecologically equivalent in type, amount and condition and that accounts for the location and timing of biodiversity losses ▪ Compensating for losses of one type of biodiversity by providing a different type that delivers greater benefits for nature conservation ▪ Achieving Net Gain locally to the development while also contributing towards nature conservation priorities at local, regional and national levels ▪ Enhancing existing or creating new habitat ▪ Enhancing ecological connectivity by creating more, bigger, better and joined areas for biodiversity
7. Be additional	Achieve nature conservation outcomes that demonstrably exceed existing obligations (i.e. do not deliver something that would occur anyway).
8. Create a net gain legacy	Ensure net gain generates long-term benefits by:

Principle	In practice
	▪ Engaging stakeholders and jointly agreeing practical solutions that secure Net Gain in perpetuity²⁶ ▪ Planning for adaptive management and securing dedicating funding for long-term management ▪ Designing Net Gain for biodiversity to be resilient to external factors, especially climate change ▪ Mitigating risks from other land uses ▪ Avoiding displacing harmful activities from one location to another ▪ Supporting local-level management of Net Gain activities
9. Optimise sustainability	Prioritise BNG and, where possible, optimise the wider environmental benefits for a sustainable society and economy.
10. Be transparent	Communicate all Net Gain activities in a transparent and timely manner, sharing the learning with all stakeholders.

C.2 Mitigation Hierarchy

Expanding on Principle 1 of the good practice principles for achieving BNG, the mitigation hierarchy and the avoidance of impacts to irreplaceable habitats must be applied when committing to achieving BNG. This is reinforced through the publication of the British Standard BS 8683:2021¹.

The sequential approach to applying the mitigation hierarchy is to:

- Avoid – Where possible habitat damage should be avoided.
- Minimise – Where possible habitat damage and loss should be minimised.
- Remediate – Where possible any damaged or lost habitat should be restored.
- Compensate – As a last resort, damaged or lost habitat should be compensated for²⁷.

Application of the mitigation hierarchy is encouraged by the Metric because BNG can be more easily achieved by avoiding the loss of habitat through either retention or enhancement. Principle 2 of the Metric adds “*The use of this biodiversity metric does not override existing biodiversity protections, statutory obligations, policy requirements, ecological mitigation hierarchy or any other requirements. This includes consenting or licensing processes, for example woodlands.*”

C.3 Biodiversity Gain Hierarchy

The Biodiversity Gain Hierarchy and its effect for the purpose of the statutory framework for BNG is set out in Articles 37A and 37D of the Town and Country Planning (Development Management Procedure) (England) Order 2015. This hierarchy (which does not apply to irreplaceable habitats) sets out a list of priority actions:

²⁶ For projects being consented through the Town and Country Planning Act 1990, the Environment Act 2021 now makes provision for habitat enhancements undertaken to deliver biodiversity gain to be maintained for a period of at least 30 years after the development is completed.

²⁷ Compensation should be undertaken on-site. If this is not possible then off-site habitat compensation may be an option; however, this should be undertaken as close to the on-site area as possible.



- First, in relation to on-site habitats which have a medium, high and very high distinctiveness, the avoidance of adverse effects from the development and, if they cannot be avoided, the mitigation of those effects.
- Then, in relation to all on-site habitats which are adversely affected by the development, the adverse effect should be compensated by prioritising in order, where possible, the enhancement of existing on-site habitats, creation of new on-site habitats, allocation of registered off-site gains and finally the purchase of biodiversity credits.

Appendix D. Habitat Baseline Plan



Figure D-1 – Habitat Baseline Plan





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Legend:

Application Site Boundary

Individual Trees:

- Small
- Medium
- Large

UKHab Polygons:

- g3c - other neutral grassland
- h2, 847 - introduced shrub
- h3a - blackthorn scrub
- c1a - arable field margins
- c1b - temporary grass and clover leys
- u1b - developed land, sealed surface
- u1 - bare ground

UKHab Lines:

- h2a, 11 - native hedgerow with trees

0 10 20 m

Original Scale: 1:800 Version: 1.0

Base Mapping: © Google Satellite Imagery
AtkinsRéal UK Limited © 200 Woodcote Grove,
Ashley Road, Epsom, Surrey KT18 5BW

Client: Wiltshire Council

Project: Lackham Roundabout

Job No: 100130925

Title: Habitat Baseline Plan

Drawn by: TW Date: 19/06/26	Checked by: RB Date: 02/07/26	Reviewed by: NC Date: 03/07/26
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Appendix E. Condition Assessment Sheets

E.1 Other Neutral Grassland

Table E-1 – BNG Condition Sheet: Grassland (Medium Distinctiveness)

Other neutral grassland (A1, A6, A9, A10 and A11)		
Condition Assessment Criteria	Criterion Passed (Yes or No)	Notes (such as justification)
A. The parcel represents a good example of its habitat type, with a consistently high proportion of characteristic indicator species present relevant to the specific habitat type (and relative to suboptimal species for this habitat ²⁸ which may be listed in the UKHab description) ²⁹ . <i>Note - this criterion is essential for achieving Moderate or Good condition for non-acid grassland types only.</i>	No	Indicative of UKHab description. But generally sub optimal species present, with ornamentals shrub species also present (A6 and A10).
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 insects, birds and small mammals to live and breed.	No	Sward height generally not varied – either tall (A6, A10 and A11) or mown short (A1 and A9).
C. Cover of bare ground is between 1% and 5%, including localised areas, for example, rabbit warrens ³⁰ .	No	No bare ground.
D. Cover of bracken is less than 20% and cover of scrub (including bramble) is less than 5%.	Yes	No bracken, bramble cover less than 5%.
E. Combined cover of species indicative of suboptimal condition ²⁸ and physical damage (such as excessive poaching, damage from machinery use or storage, damaging levels of access, or any other damaging management activities) accounts for less than 5% of total area.	Yes	Limited damage, some of the roadside grass areas appear to be regularly cut (A1 and A9).

²⁸ Species indicative of suboptimal condition for this habitat type include: creeping thistle *Cirsium arvense*, spear thistle *Cirsium vulgare*, curled dock *Rumex crispus*, broad-leaved dock *Rumex obtusifolius*, common nettle *Urtica dioica*, creeping buttercup *Ranunculus repens*, greater plantain *Plantago major*, white clover *Trifolium repens* and cow parsley *Anthriscus sylvestris*. There may be additional relevant species local to the region and or site.

²⁹ Professional judgement should be used alongside the UKHab description.

³⁰ For example, this could include small, scattered areas of bare ground allowing for plant colonisation, or localised patches not exceeding 5% cover.



If any invasive non-native plant species ³¹ are present (as listed on Schedule 9 of WCA ³²), this criterion is automatically failed.			
F. There are 10 or more vascular plant species per m ² present, including forbs that are characteristic of the habitat type. <i>Note - this criterion is essential for achieving Good condition for non-acid grassland types only.</i>		No	Not over 10 species per m ²
Essential criterion achieved (Yes or No)			No
Number of criteria passed			2
Condition Assessment Result (out of 6 criteria for non-acid grasslands)	Condition Assessment Score	Score Achieved	
Passes 5 or 6 criteria, including essential criterion A and additional criterion F.	Good (3)		
Passes 3 - 5 criteria, including essential criterion A.	Moderate (2)		
Passes 2 or fewer criteria OR Passes 3 or 4 criteria excluding criterion A and F.	Poor (1)	✓	

E.2 Blackthorn Scrub

Table E-2 – BNG Condition Sheet: Scrub

Blackthorn scrub (A2)		
Condition Assessment Criteria	Criterion Passed (Yes or No)	Notes (such as justification)
A. The parcel represents a good example of its habitat type - the appearance and composition of the vegetation closely matches its UKHab description (where in its natural range) ²⁹ : a. At least 80% of scrub is native. b. There are at least three native woody species ³³ . c. No single species comprises more than 75% of the cover (except hazel <i>Corylus avellana</i> , common juniper <i>Juniperus communis</i> , sea buckthorn <i>Hippophae rhamnoides</i> or box <i>Buxus sempervirens</i> , which can be up to 100% cover).	Yes	Good representative of scrub – more than three native woody species present, with blackthorn dominant.
B. Seedlings, saplings, young shrubs and mature (or ancient or veteran) shrubs are all present.	Yes	All ages groups present.

³¹ 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, by applying professional judgement.

³² Wildlife and Countryside Act 1981 (as amended).

³³ Native woody species as defined and listed in the Hedgerow Survey Handbook: DEFRA (2007) Hedgerow Survey Handbook: A standard procedure for local surveys in the UK. 2nd ed. [online]. Defra, London. PB1195.



C. There is an absence of invasive non-native plant species (as listed on Schedule 9) and species indicative of suboptimal condition ³⁴ make up less than 5% of ground cover.	Yes	No invasive Schedule 9 species.
D. The scrub has a well-developed edge with scattered scrub and tall grassland and or forbs present between the scrub and adjacent habitat.	Yes	Grassland, forbs, scattered scrub along edge of scrub habitat.
E. There are clearings, glades or rides present within the scrub, providing sheltered edges.	Yes	Clearing within scrub providing small, sheltered edges
Number of criteria passed		5
Condition Assessment Result (out of 5 criteria)	Condition Assessment Score	Score Achieved
Passes 5 criteria	Good (3)	✓
Passes 3 or 4 criteria	Moderate (2)	
Passes 2 or fewer criteria	Poor (1)	
Blackthorn scrub (A4)		
Condition Assessment Criteria	Criterion Passed (Yes or No)	Notes (such as justification)
A. The parcel represents a good example of its habitat type - the appearance and composition of the vegetation closely matches its UKHab description (where in its natural range) ²⁹ : a. At least 80% of scrub is native. b. There are at least three native woody species ³⁵ . c. No single species comprises more than 75% of the cover (except hazel, common juniper, sea buckthorn or box, which can be up to 100% cover).	No	Only two woody species, encroachment habitat with a lot of bramble.
B. Seedlings, saplings, young shrubs and mature (or ancient or veteran) shrubs are all present.	Yes	Seedlings, saplings, mature blackthorn present within encroachment from hedgerow behind.

³⁴ Species indicative of suboptimal condition for this habitat type may include: non-native conifers, tree-of-heaven *Alianthus altissima*, holm oak *Quercus ilex*, European turkey oak *Quercus cerris*, cherry laurel *Prunus laurocerasus*, snowberry *Symphoricarpos spp.*, shallon *Gaultheria shallon*, American skunk cabbage *Lysichiton americanus*, buddleia *Buddleja spp.*, cotoneaster *Cotoneaster spp.*, Spanish bluebell *Hyacinthoides hispanica* and hybrid bluebells *Hyacinthoides x massartiana*. There may be additional relevant species local to the region and or site.

³⁵ Native woody species as defined and listed in the Hedgerow Survey Handbook: DEFRA (2007) Hedgerow Survey Handbook: A standard procedure for local surveys in the UK. 2nd ed. [online]. Defra, London. PB1195. Available from: Hedgerow Survey Handbook.

C. There is an absence of invasive non-native plant species (as listed on Schedule 9) and species indicative of suboptimal condition ³⁶ make up less than 5% of ground cover.	Yes	No Schedule 9 species
D. The scrub has a well-developed edge with scattered scrub and tall grassland and or forbs present between the scrub and adjacent habitat.	Yes	Encroaches on field margin where saplings are present.
E. There are clearings, glades or rides present within the scrub, providing sheltered edges.	No	Area too small for glades and rides.
Number of criteria passed		3
Condition Assessment Result (out of 5 criteria)	Condition Assessment Score	Score Achieved
Passes 5 criteria	Good (3)	
Passes 3 or 4 criteria	Moderate (2)	✓
Passes 2 or fewer criteria	Poor (1)	

E.3 Individual Trees – Rural Trees

Table E-3 – BNG Condition Sheet: Individual Trees

Individual Trees – Rural Trees			
Condition Assessment Criteria	Criterion Passed (Yes or No)		
	Two medium and 14 small trees	One large tree	One small tree
A. The tree is a native species (or at least 70% within the block are native species).	Yes (2 x medium trees and 11 x small trees, of pedunculate oak, ash, field maple and cherry). No (3 x small trees)	No (sycamore)	No (sweet chestnut)

³⁶ Species indicative of suboptimal condition for this habitat type may include: non-native conifers, tree-of-heaven *Alnus altissima*, holm oak *Quercus ilex*, European turkey oak *Quercus cerris*, cherry laurel *Prunus laurocerasus*, snowberry *Symphoricarpos spp.*, shallon *Gaultheria shallon*, American skunk cabbage *Lysichiton americanus*, buddleia *Buddleja spp.*, cotoneaster *Cotoneaster spp.*, Spanish bluebell *Hyacinthoides hispanica* and hybrid bluebells *Hyacinthoides x massartiana*. There may be additional relevant species local to the region and or site.

		of copper beech and sweet chestnut)		
B. The tree canopy is predominantly continuous, with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide (individual trees automatically pass this criterion).		Yes	Yes	Yes
C. The tree is mature (or more than 50% within the block are mature).		No	Yes	No
D. There is little or no evidence of an adverse impact on tree health by human activities (such as vandalism, herbicide or detrimental agricultural activity). And there is no current regular pruning regime, so the trees retain >75% of expected canopy for their age range and height.		Yes	Yes	No
E. Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.		No	Yes	No
F. More than 20% of the tree canopy area is oversailing vegetation beneath.		Yes	Yes	No
Number of criteria passed		3/4	5	1
Condition Assessment Result (out of 6 criteria)	Condition Assessment Score	Score Achieved		
Passes 5 or 6 criteria	Good (3)		✓	
Passes 3 or 4 criteria	Moderate (2)	✓		
Passes 2 or fewer criteria	Poor (1)			✓

E.4 Native Hedgerow with Trees

Table E-4 – BNG Condition Sheet: Hedgerow

Native hedgerow with trees (H1)		
Condition Assessment Criteria	Criterion Passed (Yes or No)	Notes (such as justification)
A1. Height (>1.5 m average along length): The average height of woody growth estimated from base of stem to the top of the shoots, excluding any bank beneath the hedgerow, any gaps or isolated trees.	Yes	Over 1.5 m height average



Newly laid or coppiced hedgerows are indicative of good management and pass this criterion for up to a maximum of four years (if undertaken according to good practice). A newly planted hedgerow does not pass this criterion (unless it is >1.5 m height).		
A2. Width (>1.5 m average along length): The average width of woody growth estimated at the widest point of the canopy, excluding gaps and isolated trees. Outgrowths (such as blackthorn <i>Prunus spinosa</i> suckers) are only included in the width estimate when they are >0.5 m in height. Laid, coppiced, cut and newly planted hedgerows are indicative of good management and pass this criterion for up to a maximum of four years (if undertaken according to good practice).	Yes	Over 1.5 m width average
B1. Gap - hedge base: Gap between ground and base of canopy <0.5 m for >90% of length. This is the vertical 'gappiness' of the woody component of the hedgerow, and its distance from the ground to the lowest leafy growth. Certain exceptions to this criterion are acceptable³⁷.	Yes	Some areas where gap is over 0.5 m however less than 10%
B2. Gap - hedge canopy continuity: Gaps make up <10% of total length and no canopy gaps >5 m. This is the horizontal 'gappiness' of the woody component of the hedgerow. Gaps are complete breaks in the woody canopy (no matter how small). Access points and gates contribute to the overall 'gappiness' but are not subject to the >5 m criterion (as this is the typical size of a gate).	Yes	No canopy gaps
C1. Undisturbed ground and perennial vegetation: >1 m width of undisturbed ground with perennial herbaceous vegetation for >90% of length: ▫ Measured from outer edge of hedgerow. ▫ Is present on one side of the hedgerow (at least). This is the level of disturbance (excluding wildlife disturbance) at the base of the hedgerow. Undisturbed ground is present for at least 90% of the hedgerow length, greater than 1 m in width and must be present along at least one side of the hedgerow. This criterion recognises the value of the hedgerow base as a boundary habitat with the capacity to support a wide range of species. Cultivation, heavily trodden footpaths, poached ground etc. can limit available habitat niches.	Yes	Undisturbed on south side of hedgerow, disturbed for around 1 m on other crop side

³⁷ DEFRA (2007) Hedgerow Survey Handbook. A standard procedure for local surveys in the UK. [online] Available on: https://www.hedgeline.org.uk/cms/cms_content/files/89_hedgerow-survey-handbook.pdf [Accessed June 2026].

C2. Nutrient-enriched perennial vegetation: Plant species indicative of nutrient enrichment of soils dominate <20% cover of the area of undisturbed ground. The indicator species used are nettles <i>Urtica spp.</i>, cleavers <i>Galium aparine</i> and docks <i>Rumex spp.</i> Their presence, either singly or together, does not exceed the 20% cover threshold.	No	Nutrient enrichment evident – nettles and cleavers present
D1. Invasive and neophyte species: >90% of the hedgerow and undisturbed ground is free of invasive non-native plant species (including those listed on Schedule 9) and recently introduced species. Recently introduced species refer to plants that have naturalised in the UK since AD 1500 (neophytes). Archaeophytes count as natives. For information on archaeophytes and neophytes see the JNCC website³⁸, as well as the 'Online Atlas of the British and Irish Flora'³⁹ which contains an up-to-date list of the status of species. For information on invasive non-native species see the GB Non-Native Secretariat website⁴⁰.	Yes	No invasive Schedule 9 species
D2. Current damage: >90% of the hedgerow or undisturbed ground is free of damage caused by human activities. This criterion addresses damaging activities that may have led to or lead to deterioration in other attributes. This could include evidence of pollution, piles of manure or rubble, or inappropriate management practices (for example, excessive hedgerow cutting).	Yes	Hedgerow has limited flailing/ management activities – perhaps annual cut
E1. Tree class: There is more than one age-class (or morphology) of tree present (for example: young, mature, veteran and or ancient⁸), and there is on average at least one mature, ancient or veteran tree present per 20 – 50 m of hedgerow. This criterion addresses if there are a range of age-classes or morphologies which allow for replacement of trees and provide opportunities for different species.	No	Limited trees, same age class, under 1 tree every 20 cm
E2. Tree health: At least 95% of hedgerow trees are in a healthy condition (excluding veteran features valuable for wildlife). There is little or no evidence of an adverse impact on tree health by damage from livestock or wild animals, pests or diseases, or human activity. This criterion identifies if the trees are subject to damage which compromises the survival and health of the individual specimens.	No	Under 95% trees healthy, fair number of dead trees

³⁸ Cheffings, C. M. *et al.* (2005) The Vascular Plant Red Data List for Great Britain. Species Status 7: 1-116. [online] Available at: <https://jncc.gov.uk/resources/cc1e96f8-b105-4dd0-bd87-4a4f60449907> [Accessed June 2026].

³⁹ BSBI and Biological Records Centre (2022) Online Atlas of the British and Irish Flora. [online] Available at: <https://plantatlas2020.org/> [Accessed June 2026].

⁴⁰ GB NON-NATIVE SPECIES SECRETARIAT (2022). Available at: <https://www.nonnativespecies.org/> [Accessed June 2026].



Number of criteria passed		7
Condition Assessment Requirements	Condition Assessment Score	Score Achieved
No more than 2 failures in total; AND No more than 1 failure in any functional group.	Good (3)	
No more than 5 failures in total; AND Does not fail both attributes in more than one functional group (for example, fails attributes A1, A2, B1, C2 and E1 = Moderate condition).	Moderate (2)	✓
Fails a total of more than 5 attributes; OR Fails both attributes in more than one functional group (for example, fails attributes A1, A2, B1 and B2 = Poor condition).	Poor (1)	

E.5 Bare Ground

Table E-5 – BNG Condition Sheet: Urban

Bare ground (A8)		
Condition Assessment Criteria	Criterion Passed (Yes or No)	Notes (such as justification)
A. Vegetation structure is varied, providing opportunities for vertebrates and invertebrates to live, eat and breed. A single structural habitat component or vegetation type does not account for more than 80% of the total habitat area.	No	Lack of vegetation structure offering habitat for fauna.
B. The habitat parcel contains different plant species that are beneficial for wildlife, for example flowering species providing nectar sources for a range of invertebrates at different times of year.	No	Lack of flowering plant species.
C. Invasive non-native plant species (listed on Schedule 9 of WCA) and others which are to the detriment of native wildlife (using professional judgement) cover less than 5% of the total vegetated area. <i>Note - to achieve Good condition, this criterion must be satisfied by a complete absence of invasive non-native species (rather than <5% cover).</i>	Yes	No Schedule 9 plant species.
Essential criterion achieved (Yes or No)		Yes
Number of criteria passed		1



Condition Assessment Result (out of 3 core criteria)	Condition Assessment Score	Score Achieved
Passes all 3 core criteria; AND Meets the requirements for Good condition within criterion C.	Good (3)	
Passes 2 of 3 core criteria; OR Passes 3 of 3 core criteria but does not meet the requirements for Good condition within criterion C.	Moderate (2)	
Passes 0 or 1 of 3 core criteria.	Poor (1)	✓



Appendix F. Habitat Baseline Photographs

Table F-1 – Baseline Habitat Photographs

Habitat Parcel Reference	Description	Photograph(s)
A3	Arable field margins tussocky – <i>the field margin surrounding A5.</i>	



Habitat Parcel Reference	Description	Photograph(s)
A5	Temporary grass and clover leys – <i>the main habitat area within the Application Site.</i>	
A11	Other neutral grassland in poor condition Other neutral grassland in poor condition	

Habitat Parcel Reference	Description	Photograph(s)
A1		
A6 and A9		

Habitat Parcel Reference	Description	Photograph(s)
A10		
A12	Introduced shrub – <i>two areas of non-native shrubs either side of the existing gateway into the College.</i>	
A13		

Habitat Parcel Reference	Description	Photograph(s)
A2	Blackthorn scrub in good condition	 A photograph showing a dense, healthy blackthorn scrub in good condition. The scrub is tall and lush green, situated next to a utility pole with power lines. The background shows a clear blue sky with scattered white clouds.
A4	Blackthorn scrub in moderate condition.	 A photograph showing blackthorn scrub in moderate condition. The scrub is dense but appears slightly less healthy than the one in the previous photo. It is situated next to a grassy area. The sky is overcast with grey clouds.

Habitat Parcel Reference	Description	Photograph(s)
A7	Developed land; sealed surface – <i>the existing tarmacked road from Lackham Roundabout to the College.</i>	
A8	Bare ground in poor condition – <i>a small dug up area of previously cropland for the creation of a small drainage run-off ditch.</i>	

Habitat Parcel Reference	Description	Photograph(s)
H1	Native hedgerow with trees in good condition – <i>present along the northern boundary of the Application Site.</i>	
N/A	Rural tree – one large sycamore tree in good condition, where this is located in the north-west corner of the Application Site boundary.	

Habitat Parcel Reference	Description	Photograph(s)
N/A	Rural tree – 14 trees in moderate condition, two medium in size and 12 small in size.	

Habitat Parcel Reference	Description	Photograph(s)
N/A	Rural tree – one small tree in poor condition.	

Appendix G. Proposed Habitats Plan



Figure G-1 – Proposed Habitats Plan





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Legend:

 Application Site Boundary

Individual Trees:

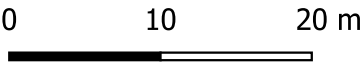
-  Small
-  Medium
-  Large

UKHab Polygons:

-  g3c - other neutral grassland
-  g4 - modified grassland
-  h2, 847 - introduced shrub
-  h3a - blackthorn scrub
-  c1a - arable field margins
-  c1b - temporary grass and clover leys
-  u1b - developed land, sealed surface
-  u1 - bare ground

UKHab Lines:

-  h2a, 11 - native hedgerow with trees



Original Scale: 1:800 Version: 1.0

Base Mapping: © Google Satellite Imagery

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Ashley Road, Epsom, Surrey KT18 5BW

Client: Wiltshire Council

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Drawn by: TW Date: 30/06/26	Checked by: RB Date: 02/07/26	Reviewed by: NC Date: 03/07/26
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