

Biodiversity Net Gain Report

Land south of White Horse Business Park, Trowbridge

02 July 2026

Ecology
Arboriculture
Land Management





Report Details

Report Title	Biodiversity Net Gain Report
Report Reference	3208-BNG-LO

Quality Assurance & Revision Record

Revision	Date	Author	Checked By	Approver	Summary of Changes
V1	02 July 2026	Luke Owen BSc	Lindsay Taylor BSc MSc ACIEEM	Lindsay Taylor BSc MSc ACIEEM	
V2	02 July 2026	Alexia Michaelides MBiol ACIEEM	Ryan Yeates BSc MCIEEM	Ryan Yeates BSc MCIEEM	Minor layout amends

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Site Details

Site Name and Location	Land south of White Horse Business Park, Trowbridge
Central OS Grid Reference	ST 85742 55758
Client	Allison Homes

Boundary





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1 Introduction

This report provides a Biodiversity Net Gain Report for Land south of White Horse Business Park, Trowbridge in relation to Condition 9 as outlined within the Committee Minutes in March 2025 (planning ref: 20/03641/OUT).

This document has been prepared to provide sufficient information to satisfy Condition 9 of the committee report. This states:

“The development shall be completed in accordance with the Biodiversity Metric 3.0, NPA, July 2023 P02 or a subsequent revised Biodiversity Metric Calculation to be submitted to and approved in writing by the Local Planning Authority. This condition will be discharged when a report has been submitted to and approved in writing by the Local Planning Authority which demonstrates that the development has been completed in accordance with the approved metric calculation. The report will demonstrate for habitats and hedgerows and that the development will achieve at least 100% mitigation (ie: no net loss) for land lost to development. The development shall then be carried out in accordance with the details approved by the Local Planning Authority”.

The report was commissioned by Allison Homes.

The area within the application boundary is hereafter referred to as the ‘Site’.

Biodiversity Net Gain (BNG) is an approach to development that aims to leave the natural environment in a measurably better state than it was initially and meets the requirements of the Government’s 25 Year Environment Plan. The Environment Act (2021) requires most planning applications in England to deliver a 10% net gain in biodiversity.

1.1 Site Context

The Site is located northeast of North Bradley and south of Trowbridge and is approximately 8.37ha comprising five fields which are lightly grazed by cattle and bounded by hedgerows, woodland or fencing.

1.2 Description of Proposed Development

The development consists of up to 70 dwellings, landscaping, green infrastructure, associated drainage measures and vehicular access from the A363 as well as all associated works.

1.3 Aims

The aims of this report are to:

-  Provide the national mandatory Biodiversity Net Gain information requirements;
-  Provide a subsequent revised Biodiversity Metric Calculation;
-  Provide a report which demonstrates that the development has been completed in accordance with the Biodiversity Metric Calculation and for habitats and hedgerows and that the development will achieve at least 100% mitigation (i.e.: no net loss) for land lost to development.

2 BNG Assessment

A baseline and indicative post-development BNG assessment was undertaken using the statutory biodiversity metric (released in July 2025 and downloaded directly from the Government website¹ on 08 April 2026) following current guidance (Defra, 2025a). Further detail on the methodology is provided in **Appendix 2**.

2.1 Baseline and Post-Development Background

The baseline position was established at Outline (NPA, 2023a) and the post-development BNG position is based upon the separately submitted Landscape Strategy Plan, see **Appendix 3**. The Landscape Strategy Plan has been produced in line with the approved Green Infrastructure Parameters Plan (GIPP) (NPA, revised 2023b), see **Appendix 4** which outlines the area for residential development, and wider green infrastructure including tussocky grassland, broadleaved native woodland planting, orchard planting and scrub planting.

2.2 BNG Assessment Summary

The on-Site baseline and post-development BNG position are demonstrated in **Table 1**. As discussed above, the Site baseline was established at Outline, and that baseline is used in the calculation below. However, the hedgerow habitats were not included within the Metric at Outline, their condition was subsequently established during a Site walkover 17th December 2025 by Luke Owen BSc as outlined in **Appendix 2**.

Full details of the calculations are provided in the statutory metric calculation tool (GE Consulting, 2026a). Baseline and post-development BNG plans are presented in **Figures 1 and 2**.

Table 1: Summary of on-Site BNG Metric Assessment

Unit Type	On-Site Baseline Units	On-Site Post-development Units	Net Unit Change	% Change
Habitat	49.76 ²	53.37	+ 3.81	+ 7.65%
Hedgerow/ Linear	15.65	22.33	+ 6.67	+ 42.64%

The updated BNG assessment based on the Landscape Strategy Plan suggests that for habitat and hedgerows, at least 100% mitigation (i.e.: no net loss) is achievable. It is noted that the trading rules for hedgerows are satisfied, however the trading rules for habitats are not satisfied due to the loss of other neutral grassland habitat in order to create habitats that are more beneficial to woodland bat species, this is discussed further in **Section 2.3 and 2.4**.

2.3 BNG Metric Trading Rules and Mitigation

As outlined within the Ecology Addenda submitted at the Outline application stage (NPA, 2022 and 2023c), the accepted Biodiversity Metric (NPA, 2023a) set out a strategy focused on retaining, enhancing and creating habitats – primarily through maintaining the on-Site grassland outside the development area as other neutral grassland and enhancing this from ‘poor-good’ and ‘moderate-

¹ <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides>

² The baseline habitats were entered as high strategic significance at outline; as these areas fall outside of areas covered by the Wiltshire LNRS, these have been entered into the updated metric as ‘area/compensation not in local strategy/ no local strategy’.

good'. This approach delivered an 18.57% Biodiversity Net Gain. The Ecology Addenda (NPA, 2022 and 2023c) also recorded the following agreement with the county ecologist:

'As discussed with and accepted by the county ecologist, if habitats that were more beneficial to the woodland bat species were then proposed (e.g. woodland, orchard, scrub), but which scored more poorly on the metric, the score based on grassland retention/enhancement would be accepted'.

In line with this agreed approach, the detailed scheme has been designed to incorporate habitats that support woodland bat species. While large areas of the Site will continue to be retained as other neutral grassland and managed as meadow, consistent with the Outline application (NPA, 2022 and 2023c) and the Landscape and Ecological Management Plan (GE Consulting, 2026b), additional habitat types have been integrated into the wider landscaping to strengthen woodland bat foraging and commuting opportunities.

Consistent with the approved GIPP (NPA, revised 2023b) see **Appendix 4**, broadleaved native woodland planting is proposed to strengthen habitat connectivity for bats, including a wooded corridor along the western edge of the Site to provide a strong north–south commuting route. Complementing this, broadleaved native parkland tree planting is proposed throughout the western parcels of the Site, in accordance with the wider green infrastructure requirements set out in the approved GIPP.

The GIPP (see **Appendix 4**) also identifies the requirement for scrub and orchard planting. A locally distinctive orchard is proposed at the centre of the Site, adjacent to areas of proposed native scrub and the existing Core Bat Habitat. Native mixed scrub is distributed throughout the development, particularly along field boundaries and hedgerows. Together with the orchard, these habitats form a mosaic that includes tussocky grassland at the Site edges and other neutral grassland under traditional meadow management, providing a diverse resource for foraging and commuting bats.

2.4 Conclusion

Although the inclusion of woodland, orchard and scrub results in these habitats being counted as created (and therefore the trading rules are not fully satisfied due to the loss of other neutral grassland) the approach remains consistent with the discussions held with the county ecologist and documented within the Ecology Addenda (NPA, 2022 and 2023c). Given that these habitats have been incorporated specifically to benefit woodland bat species and to comply with the GIPP, the resulting net gain is considered acceptable.



3 References

Defra (2025a) The Statutory Biodiversity Metric – Technical Annex 1: Condition Assessment Sheets and Methodology July 2025. Available from: <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides>.

Defra (2025b) The Statutory Biodiversity Metric User Guide July 2025 from: <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides>.

GE Consulting (2026a) The Statutory Biodiversity Metric.

GE Consulting (2026b) Landscape and Ecological Management Plan.

JNCC (2010) *Handbook for Phase 1 Habitat Survey - a Technique for Environmental Audit*. JNCC, Peterborough, ISBN 0 86139 636 7.

Nicholas Pearson Associates (2022) Ecology Addendum.

Nicholas Pearson Associates (2023a) The Biodiversity Metric 3.0 – Calculation Tool.

Nicholas Pearson Associates (2023b) Green Infrastructure Parameters Plan (revised August 2023).

Nicholas Pearson Associates (2023c) Ecology Addenda.

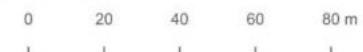
UKHab Ltd (2023) *UK Habitat Classification Version 2.0*. Available from: <https://www.ukhab.org>.



Key:

- Site Boundary
- Native Hedgerow
- Native Hedgerow - Associated with bank or ditch
- Native Hedgerow with trees
- Native Hedgerow with trees - Associated with bank or ditch
- g3c - Other neutral grassland
- h3h - Mixed scrub

Plan is to Scale
Scale at A4: **1:2,000**



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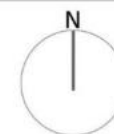
Figure 1:
On-site Baseline Habitat Plan

Project:
Land South of White Horse Business Park, Trowbridge

Client:
Allison Homes

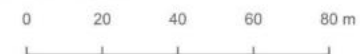
Date:
24/4/2026
Ref:
3208-BNG-F1

Drawn:
LO
Revision:
-





Plan is to Scale
Scale at A4: **1:2,000**



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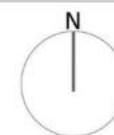
Figure 2:
On-site Post-intervention Proposed Habitat Plan

Project:
Land South of White Horse Business Park, Trowbridge

Client:
Allison Homes

Date:
2/7/2026
Ref:
3208-BNG-F2

Drawn:
AMI
Revision:
v2



Appendix 1 – General Glossary of Terms

Annex I	Threatened bird listed on Annex I of the EC Birds Directive/ Habitats listed on Annex I of the EC Habitats Directive
Annex II	Species of community interest whose conservation requires the designation of SACs
BAP	Biodiversity Action Plan
BMCL	Bat Mitigation Class Licence
BNG	Biodiversity Net Gain
BoCC	Bird of Conservation Concern
CEMP	Construction Environmental Management Plan
CWS	County Wildlife Site
DBW	Daytime Bat Walkover
EcIA	Ecological Impact Assessment
EPS	European Protected Species
GLTA	Ground Level Tree Assessment
HPI	Habitat of Principal Importance required under Section 41 of the NERC Act 2006
HSI	Habitat Suitability Index
HMMP	Habitat Management and Monitoring Plan
IRZ	Impact Risk Zone
GCN	Great crested newt
JNCC	Joint Nature Conservation Committee
LBAP	Local Biodiversity Action Plan
LEMP	Landscape and Ecology Management Plan
LPA	Local Planning Authority
LWS	Local Wildlife Site
MMU	Minimum Mapping Unit
NBW	Night-time Bat Walkover
NE	Natural England
NERC Act	Natural Environment and Rural Communities Act 2006
NPPF	National Planning Policy Framework
NVA	Night Vision Aid
NVC	National Vegetation Classification Survey
OSWI	Other Site of Wildlife Interest
pCWS	Potential County Wildlife Site
POS	Public Open Space
PRA	Preliminary Roost Assessment
PRF	Potential Roost Feature
Ramsar	A wetland site designated to be of international importance under the Ramsar Convention
RPA	Root Protection Area
SAC	Special Area of Conservation
SPA	Special Protection Area
SPI	Species of Principal Importance required under Section 41 of the NERC Act 2006
SSSI	Site of Special Scientific Interest
UKHAB	UK Habitat Classification
UWS	Unconfirmed Wildlife Site
WCA	Wildlife and Countryside Act 1981(as amended)
ZOI	Zone of Influence

Appendix 2 – Biodiversity Net Gain Assessment Methodology

Site Survey and Condition Assessment

The Site was surveyed by Luke Owen BSc on 17 December 2025, comprising a UK Habitat Classification (UKHab) survey (UKHab Ltd. 2023, V2.0) and condition assessment following the criteria in the Statutory Biodiversity Metric – Technical Annex 1: Condition Assessment Sheets and Methodology (Defra, 2025a). Where ditches and/or watercourses were present within the vicinity of the Site, additional information was recorded to detail encroachment in line with the Statutory Metric User Guide (Defra, 2025b). This applies to ditches within 5m of the Site boundary and watercourses within 10m of the Site boundary.

All relevant habitats within the Site were identified, described and mapped during the field survey in accordance with the UK Habitat Classification (UKHab) (UKHab Ltd., 2023 (V2.0)) and Statutory Biodiversity Metric (Defra, 2025b) classifications for hedgerows, with other linear and point features mapped using Phase 1 Habitat Survey symbology (JNCC 2010). Primary habitats have been mapped to a minimum mapping unit (MMU) of 25m², although where features of note of a smaller scale are present, these have also been recorded and mapped.

Any habitats (e.g. traditional orchard) with no appropriate primary habitat label were assigned a secondary habitat code. Other secondary UKHab codes were recorded where relevant, although they are described qualitatively within this report for ease of reading.

Biodiversity Metric Methodology

The BNG assessment was undertaken as per the Statutory Biodiversity Metric User Guide (Defra 2025a) using a copy of the statutory Defra metric downloaded directly from the Government website³ on 08 April 2026

The habitats identified during the walkover survey were compared to current and historic satellite imagery (including Google Earth Pro and Google Maps) to assess whether degradation has occurred between 30 January 2020 and the date of the survey. Where degradation has occurred in this timeframe, the habitats on Site immediately prior to the degradation was used as the baseline for the Site in line with government guidance.

The Site was divided up into distinct habitat parcels and linear features based on UKHab and Statutory Biodiversity Metric classifications and measured accordingly using the QGIS mapping tool.

The area of each habitat to be created, retained, and/or enhanced, as per the figures measured from the Landscape Strategy Plan in QGIS, was entered into the metric. These were then each given an appropriate target condition and strategic significance score.

The baseline BNG plan is shown in **Figure 1** and the indicative post-development BNG plan is shown in **Figure 2**.

Strategic Significance

The strategic significance score represents the local significance of the habitat based on its location and habitat type and is considered separately for each individual habitat. The value is determined by referring to

³ <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides>



the relevant Local Nature Recovery Strategy (LNRS). Where this has not yet been published, Local Planning Authority (LPA) biodiversity and green infrastructure strategies that apply to the site have been referred to.

The Site location falls within the area covered by the Wiltshire LNRS, however, it is not within a focus area for nature recovery with the exception of a small section in the south of the Site which is covered by 'nature on our doorstep' and so all habitats were considered to have Low strategic significance.

Assumptions

The following assumptions were made to complete the calculations:

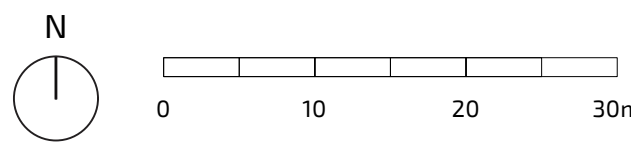
- 🦋 The baseline type and condition of habitats on Site was taken from the Outline application (NPA, EclA and Ecology Addenda);
- 🦋 It is assumed there will be no delay in starting habitat creation; and
- 🦋 It is assumed the measures in the CEMP and LEMP will be followed to ensure that the proposed habitat retention, creation and enhancements are achievable.

Limitations

There were no limitations associated with the Site survey or BNG calculations.



Appendix 3 – Landscape Strategy Plan (FPCR, 2026)



Green Infrastructure Parameters Plan (Drawing Number: NPA11020 301 Rev P03)

1. Localised access road width restriction to minimise the hedgerow break (max 9.5m gap). Trees planted either side of break to minimise gap by canopy spread as far as H&S allows.
2. 2m wide hedgerow break to allow for unit pedestrian access to proposed adjoining housing site.
3. Wider Green Infrastructure - To be planted/managed in advance of construction where away from construction works.
4. Existing grassland to be retained and enhanced through hay meadow management.
5. Tussocky grassland management.
6. Network of unit pathways (including hard standing path and grass paths).
7. Allowance for up to 0.2ha of amenity managed grassland for informal play.
8. SUDs.
9. Broad-leaved native woodland planting - to strengthen bat habitat connectivity between business park woodland and Elm Grove to existing east-west hedgerow.
10. Broad-leaved native woodland planting - wooded corridor (at least 20m wide) to provide strong north-south bat commuting corridor along western edge of Site.
11. Broad-leaved native parkland tree planting (e.g. Oaks).
12. Scrub planting.
13. Orchard planting.
14. Proposed 2m wide native species-rich hedgerow. To be managed at no lower than 2m high.
15. Formal Play Area - Hard surface
16. Permanent water body to provide suitable breeding habitat for Great Crested Newts.
17. Key links to wider bat habitat

1. All drawing dimensions to be checked and verified prior to construction.
2. Drawings are design intent and for Planning purposes only.
3. Drawings to be checked and verified by the project Architect, Engineer, M&E Engineer, Lighting consultant.
4. Specification/depth/location of root barriers to the project engineer's design.
5. All services and drainage easements are to be checked and verified by the project engineer.
6. The landscape contractors shall make themselves aware of all service locations, health and safety and risk assessments prior to commencing planting operations.
7. It is the responsibility of the project engineer to design foundations to accommodate all proposed and existing tree and shrub planting, with reference made to NHEC Standards, Parts 4.2, 2014 (Building near Trees).
8. All planting work to be carried out in accordance with BS5428 1989 Code of Practice for General Landscape Operations.
9. All levels to be checked and verified by the project engineers prior to construction.
10. All works to and around existing retained trees are subject to an Arboricultural Method Statement.
11. All steps, structures, paving and fencing are to be checked and verified by the project engineer.
12. For setting out see the project engineer's drawings.
13. Please refer to the L&MP for specification & management prescriptions.

Legend

- | | | | |
|--|--|----------------|--|
| | Application Boundary | | Footpath |
| | Existing Trees & Hedgerows | | Mown Path |
| | Tree Planting | | Equipped Play Area |
| | Locally Distinctive Orchard Tree Planting | | Bench |
| | Woodland Planting
Planted @ 1.2m centers | ON PLOT | |
| | Native Scrub Planting
Planted @ 1.2m centers | | Street Tree Planting |
| | Native Species Rich Hedgerow Planting & Hed
Pink dashed line indicates screening features | | Primary Street Ornamental Planting |
| | Amenity Grassland
Eriogonops E1 - Flowering Leam Mixture | | Primary Street Hedge
6 per 1m in a single row |
| | Wet Grassland
Germinal Mix WFCG - Wetland and Pond Areas | | Side Street Ornamental Planting |
| | Meadow Grassland
E142 Standard General Purpose Meadow Mixture | | Side Street Hedge
6 per 1m in a single row |
| | Tussock Grassland | | Turf |
| | Bulb Planting | | |

P04	18/06/2026	Updated layout	JUB/JIT
P03	03/04/2026	Updated following Comments	RW/JIT
P02	11/03/2026	Adjusted for vis splay	CHR/JIT
P01	12/02/2026	First Issue	RW/JIT
rev	date	description	am / rsk

client
Allison Homes

project
Land south of A363
North Bradley

title
Landscape Strategy Plan

number
13733-FPCR-XX-XX-DR-L-0001

status
S3

rev
P04

scale
1:500



Appendix 4 – Green Infrastructure Parameters Plan (NPA, 2022)



Existing hedgerow retained

Existing tree or tree group to be retained.

T45
Tree in close proximity to built development proposals with bat roosting potential.

Hedgerow to be removed to facilitate access and circulation

Extent of existing on-site Core Bat Habitat

Key links to wider bat habitat

Wider Green Infrastructure
To be planted/managed in advance of construction where away from construction works.
Existing grassland to be retained and enhanced through hay meadow management, but to also include:

- tussocky grassland management;
- network of unlit pathways;
- allowance for upto 0.2ha of amenity managed grassland for informal play;
- SUDs;
- Broad-leaved native woodland planting;
- Broad-leaved native parkland tree planting (e.g. Oaks);
- Scrub planting;
- Orchard planting; and
- key planting identified below.

Proposed 2m wide native species-rich hedgerow.
To be managed at no lower than 2m high.

Broad-leaved native woodland planting to strengthen bat habitat connectivity between business park woodland and Elm Grove to existing east-west hedgerow

Wooded corridor (at least 20m wide) to provide strong north-south bat commuting corridor along western edge of Site.

Indicative location of formal Play Area
Hard surface

Indicative location of informal Play Area
Amenity grassland

Proposed residential development

Proposed highway

Proposed location of pumping station
(to be outside Core Bat Habitat)

Indicative SUDs layout

Indicative location of permanent water body to provide suitable breeding habitat for Great Crested Newts.

Indicative location of hard-standing path

Indicative location of grass path

Localised access road width restriction to minimise the hedgerow break (max 9.5m gap). Trees planted either side of break to minimise gap by canopy spread as far as H&S allows.

Newt crossing detail

Street lighting to be in accordance with the principals shown in the Lighting Strategy (Abley Letchford Partnership, July 2023).

Housing along the boundary with the White Horse Business Park not having any glazing above first floor level facing that boundary and housing along all the boundaries to have sensitively designed internal lighting e.g. recessed and 1m away from glazing.

P03	DH	DH	SK	Updated to align with Illustrative Sketch Layout	01/08/2023
P02	DH			Revised to reflect updated proposals	27/07/2023
Rev	Drawn	Checked/Approved	Description		Date

NICHOLAS PEARSON ASSOCIATES

ENVIRONMENTAL PLANNERS • LANDSCAPE ARCHITECTS • ECOLOGISTS

Client

Castlewood Properties Ventures Ltd

Project

Land at White Horse Business Park, Trowbridge

Drawing

Green Infrastructure Parameters Plan

Drawing No.

NPA 11020 301

Date

28/01/2022

Scale

1:1000@A2

Rev

P03

Drawn

DH

Checked

Approved

Status

PLANNING

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Draw Ref

\\npa-data\Draw\Projects\11020 CPV\Work\Ecology\Green Infrastructure - Parameters Plan July 2023.dwg

Plotted on

8/1/2023

By

Tom Brickell

Plotscale:

1:1

Paper Size

ISO full bleed A2 (420.00 x 594.00 MM)

Plot style:

NPA_COL.ctb

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