

Biodiversity Net Gain Report

Trowbridge Campus, Wiltshire

August 2026

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Report Produced for Peninsula Projects on Behalf of Trowbridge Council

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Issue: Draft

Date: August 2026

Project: ETH26-361 – Trowbridge Campus



EXECUTIVE SUMMARY

- 1.1 This report provides an assessment of the biodiversity change of a proposed development at Wiltshire College & University Centre Trowbridge, Wiltshire. The baseline habitats include modified grassland, introduced shrub planting, individual trees, and developed land sealed surface in the form of buildings and paths.
- 1.2 The proposals include the construction of a brick wall in the front of the campus as well as the creation of two extensions towards the centre and northern part of the site. As a result of this, four individual trees will be lost as well as sections of grassland. However, the proposals include the planting of 37 additional trees, the creation of a hedgerow, and enhancement of the amenity grassland.
- 1.3 Overall, the project exceeds the 10% Biodiversity Net Gain requirement, delivering a net gain of 0.22 area units (13.8%) as calculated using the statutory metric. In addition, a gain of 0.79 hedgerow units will also be achieved. No watercourse units will be impacted by the development.

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1 INTRODUCTION

- 1.1 This report provides an assessment of the biodiversity change following the proposals for Wiltshire College & University Centre Trowbridge, Wiltshire, shown within Figure 1 and hereby referred to as the 'site'.
- 1.2 The site is located within the Wiltshire Local Planning Authority (LPA) and the Avon Vales National Character Area (NCA).
- 1.3 This report is submitted alongside the Statutory BNG Metric and detailed plans of the baseline and proposed habitats. The proposed habitats have been mapped in accordance with the **LANDSCAPE PLAN** (AWW, 2026). This report includes information required to provide the BNG objective which can be secured with a BNG gain plan once planning has been completed.
- 1.4 This report is finalised and is awaiting the landscape plans to confirm the location and type of habitats required to obtain a 10% gain onsite.



Figure 1 Site location

2 SCOPE OF REPORT

- Establishes the total number of baseline Area Habitat Units (AHU) and Linear Biodiversity Units (LBU), and River Biodiversity Units (RBU) within the site
- Establishes the total number of AHU, LBU, and RBU which will be retained, enhanced, and created under the current design of the proposed development's landscape plan
- Determines whether the proposed development will result in a quantitative net loss, no net loss, or a net gain for biodiversity on site
- Determines whether the proposed development achieves a scheme-wide net gain for biodiversity by evidencing compliance with the good practice principles.

2.1 Biodiversity Net Gain (BNG) assessment

2.1.1 This BNG assessment uses the following industry recognised best practice methods:

- CIEEM, IEMA & CIRIA (2016). Biodiversity Net Gain: Good Practice Principles for Development
- CIEEM (2021). Biodiversity Net Gain Report & Audit Template
- DEFRA (2023) The Statutory Biodiversity Metric
- DEFRA (2026) The Statutory Biodiversity Metric User Guide

2.1.2 The quantitative outcomes of the calculations are one component of the BNG assessment and associated good practice principles. A BNG assessment also requires the collation of qualitative evidence on the application of the mitigation hierarchy, stakeholder engagement and post-development habitat management. Collectively, these quantitative outcomes and qualitative evidence are used to inform the outcomes of the project wide BNG assessment.

2.2 Legislation

2.2.1 The relevant primary legislation for the statutory framework for biodiversity net gain is principally set out under Section 90A and Schedule 7A (Biodiversity Gain in England) of the Town and Country Planning Act 1990. This legislation was inserted into the Act by Schedule 14 of the Environment Act 2021 and includes amendments made by the Levelling Up and Regeneration Act 2023 and the Biodiversity Gain (Town and Country Planning) (Consequential Amendments) Regulations (2024). The relevant biodiversity net gain regulations most directly relevant to planning are:

- The Environment Act 2021 (Commencement No. 8 and Transitional Provisions) Regulations (2024) which commence biodiversity net gain for most types of new planning applications and provides transitional arrangements for section 73 permissions.
- The Biodiversity Gain Requirements (Exemptions) Regulations (2026) which prescribe exemptions for categories of development to which biodiversity net gain does not apply
- The Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations (2024) which 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 related to planning applications and the Biodiversity Gain Plan, as well as modifications for phased development.

- The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations (2024) which set out the modifications for irreplaceable habitat.

2.3 BNG Hierarchy

2.3.1 The biodiversity gain hierarchy for the purpose of the statutory framework for biodiversity net gain is set out in Article 30A of the Development Management Procedure Order. This hierarchy is separate to the general mitigation hierarchy set out within the NPFF, and is summarised below:

- Avoid adverse effects on onsite habitat, especially where the habitat has a distinctiveness score of six or more (as defined by the statutory biodiversity metric).
- Mitigate any adverse effects that cannot be avoided.
- Enhance the remaining onsite habitat, where mitigation alone is insufficient.
- Create new onsite habitat, where enhancement of existing habitat is not feasible.
- Secure offsite biodiversity gains through enhancement or creation of habitat that is:
 - Registered on the Biodiversity Gain Site Register, and
 - Available to be allocated to the development.
- Purchase biodiversity credits from the Government, only where onsite and offsite measures are not possible or sufficient.

2.3.2 2026 updates to this hierarchy state that non-exempt minor Developments can evaluate on-site enhancements and local off-site biodiversity units at the same time and can choose to go straight to offsite in the first instance.

3 METHODOLOGY

3.1 Desktop Survey

3.1.1 The LPA area and NCA used for the desktop survey are shown in Figure 2.

3.1.2 A search was undertaken using publicly available information for priority habitats using the Natural England Priority Habitat Inventory.

3.1.3 A search using publicly available information has been used to identify any irreplaceable habitats which are within or in proximity to the site. This included a search for Ancient Semi Natural Woodland (ASNW) and Ancient Trees using the Ancient Tree Inventory (ATI) online layer.

3.1.4 The desktop survey included a search for local plans, wildlife strategies, or local policy which may inform strategic significance of the habitats.

3.2 UK Habitat Classification Survey

- 3.2.1 The habitat survey was carried out on the 9th of July 2026 according to the UKHab Classification system. The survey included a detailed assessment of the land within the development boundary, including a description and mapping of all key features and habitat types. The survey was carried out to identify the range of habitats within the site and the predominant and notable species of flora.
- 3.2.2 Grasslands were surveyed using a systematic approach, using 1x1m² quadrats sample. A minimum of three quadrats were undertaken of each grassland section. Information collected within each quadrat included aspect, slope, average ground cover, sward variation, species, and their percentage cover.
- 3.2.3 Individual trees are defined as trees that do not form part of another habitat type which inherently includes trees, such as woodland, orchard, hedgerow with trees, or mixed scrub. Individual trees may present as single specimens but can also occur as groups or lines of trees, particularly within an urban context. Tree groups were identified during the assessment and their diameter at breast height was recorded.

3.3 Condition Assessments

- 3.3.1 Condition assessments were undertaken for each habitat which require condition assessment sheets. Following the methodology and criteria provided within The Statutory Biodiversity Metric – Technical Annex 1: Condition Assessments Sheets and Methodology.

3.4 Limitations and Assumptions

- 3.4.1 Habitat areas (ha) and lengths (km) produced in GIS were rounded to two decimal places for inputting into the metric or for smaller habitats two significant figures. Due to rounding of values there are discrepancies in the total area of lost and created habitats within the metric. This is not considered a limitation to this BNG assessment because all habitats are considered to be captured accurately in GIS for representation in the BNG assessment.
- 3.4.2 Grassland A5 has not been surveyed as it was brought into the redline boundary after the survey was undertaken to accommodate space for tree planting. Although the grassland is largely analogous across the site and is likely the same type and condition, this is not confirmed and it therefore considered to be a limitation to this assessment.

- 3.4.3 Due to extreme hot and prolonged periods of limited precipitation alongside the low sward height of the grassland, botanical identification is more difficult to confirm species, and many grasses had to be surveyed vegetatively. Although this is the case, it is considered that the grassland is managed for amenity value and likely comprise modified swards with limited herb cover as a result of the long-term management. Although the survey period is a limitation it is not considered to be significant in terms of this assessment.

4 DESKTOP SURVEY

4.1 Strategic Areas and Priority/Irreplaceable Habitats

- 4.1.1 There are no designated sites within proximity of the site and only limited areas of priority woodland within the 1km radius as set out below. No priority or irreplaceable habitats are present onsite.
- 4.1.2 The site falls within the Wiltshire Local Nature Recovery Strategy (LNRS). However, this site is not located within any strategic area highlighted by the LNRS and as such, all the habitats within this assessment have been input as being of a low strategic significance (Wiltshire Council, 2026).



Figure 2 Priority habitats

5 BASELINE HABITATS

5.1.1 The site encompasses 0.74 hectares. The baseline map displays the existing habitats onsite (Figure 6) and the habitats are listed below. Conditions sheets for the baseline habitats are provided within Appendix 2 of this report.

- Grassland – Modified Grassland
- Urban – Developed Land; Sealed Surface
- Urban – Introduced Shrub
- Individual Trees – Urban Tree



Figure 6 Baseline Habitats

5.2 Area Biodiversity Units

Modified grassland (A1 – A6)

- 5.2.1 The site consists of a 0.2575 ha area of modified grassland, across five habitat parcels. Modified grassland is a low distinctiveness habitat type and is characterised by having poor species diversity (<9 per m²) and often dominated by fast growing grasses on fertile soil with perennial rye-grass and white clover being a dominate species. The grasses on site were dominated by perennial rye-grass and as such has been classified as a modified grassland.
- 5.2.2 All but A3 and A4 of the modified grassland parcels were assessed in poor condition. A1 and A2 pass five of the seven criteria only failing on criteria A and B due to a lack of species diversity and a uniform sward height. Despite passing five criteria, these grassland parcel failed essential criterion A and therefore can only achieve poor condition. Similar to A1 and A2, A6 also failed criterion A and criterion B as well as D and E due to extensive cover of bare ground and clear evidence of physical damage. Area A5 was assumed to be in poor condition as photos provided by AWW show that the area is similar to A6, this area will however be surveyed in the future to ensure the assessment is thorough. The sum of the areas of modified grassland achieving poor condition is 0.2377 ha, where A5 was the largest parcel at 0.09 ha.
- 5.2.3 A3 and A4 passed four and five criteria respectively, both passing criteria A, C, F, and G, and both failing criteria B and D due to the uniformity of the sward height and physical damage caused to the grasses. A3 also fails criterion E as there was excessive bare ground. Therefore, both of these parcels attain moderate condition. The sum of the areas of modified grassland on site achieving moderate condition is 0.0198 ha.



Photo 1 Modified grassland (A1)



Photo 2 Modified grassland (A2)



Photo 3 Modified grassland (A3)



Photo 4 Modified grassland (A4)

Photo 5 Modified grassland (A5)



Photo 6 Modified grassland (A6)

Introduced Shrub (A7)

- 5.2.4 Towards the north of the site there are two areas of introduced shrub that line the entrance to the building. This is a low distinctiveness urban habitat type which does not require a condition assessment as it is assumed that these habitat types have a fixed ecological value. These areas of planting cover 0.007 ha.



Photo 7 Introduced shrub on site (A7)

Developed Land; Sealed Surface (A8)

- 5.2.5 0.47ha of hardstanding developed land is found across the site, this ranges from roads, paths, and buildings. This is a very low distinctiveness habitat type that has no ecological value and as such does not need a condition assessment.

Individual trees

- 5.2.6 In total there are 11 individual urban trees on site, this is split between seven small trees DBH (<30cm) and five medium sized trees (DBH >30). Trees are a medium distinctiveness habitat type and their conditions on site varied between poor and good condition.
- 5.2.7 The four trees in the north of the site were assessed in poor condition as they are ornamental non-native Juneberry trees (*Amelanchier* genus), do not have a continuous canopy, are all young trees, and do not have ecological niches. This results in these trees only passing two criteria as more than 20% of the canopy over sails vegetation and there are no adverse impacts by human impacts. This group of trees covers an area of 0.0163 ha.
- 5.2.8 In the centre of the site there are three native birch trees, two medium trees and one small sized tree, this covers an area of 0.0366 ha. They pass all but one criterion due to a lack of ecological niches present.

5.2.9 Finally, in the south of the site the remaining four trees are present, these are two medium sized and two small trees – totalling an area of 0.0407 ha. Similar to the trees in the centre of the site they were assessed in good condition, only failing the criterion due to a lack of significant ecological niches.



Photo 8 Four small June-berry trees in the north of the site



Photo 9 Three birch trees in the centre of the site

6 PROPOSALS

- 6.1.1 The proposals include the construction of two separate extensions both in the centre of the site and to the north. This will result in the removal of trees to accommodate the development as well as removal of grassland and developed land.
- 6.1.2 In order to achieve BNG on site and meet the trading rules, an area of modified grassland will be enhanced to other neutral grassland in moderate condition as well as planting of 37 small native trees.
- 6.1.3 A hedgerow will be created during the development. This will generate an uplift in BNG for linear hedgerow habitat as the baseline was zero.

7 POST INTERVENTION HABITATS

- 7.1.1 Condition assessment sheets for created and enhanced habitats are provided within Appendix 3 of this report. The proposed condition assessments include justification for how the habitats will meet their target conditions.



Figure 7 Proposed Habitats

7.2 Lost Area Biodiversity Units

Developed Land; Sealed Surface

- 7.2.1 0.01 ha of developed land; sealed surface will be removed in order to accommodate the creation of a brick wall in the south of the site and the extension in the north.

Modified Grassland

- 7.2.2 Sections of low distinctiveness grassland A2, A3, and A4 will be removed in the north of the site to allow the creation of the extension in both areas. Grassland A3 and A4 are in moderate condition and A2 is in poor condition.
- 7.2.3 For grassland A2, this will be 0.01 ha of removal, for A3 this will be 0.0002 ha, and for A4, this will be 0.0048 ha.

Individual trees

- 7.2.4 One of the northern small individual trees will be removed equalling an area of 0.0041 ha. All 0.0366 ha of trees in the centre of the site will be removed.

7.3 Retained Area Biodiversity Units

Developed Land; Sealed Surface

- 7.3.1 0.46 ha of the hardstanding surfaces will be retained as part of this project, this consists of the paths, roads, and buildings on site.

Modified Grassland

- 7.3.2 Grassland is retained where possible resulting in 0.1902 ha of the 0.2652 ha being kept and managed in its current condition. From this retained land, 0.1777 ha of grassland is the poor condition parcels, and 0.0125 ha is the moderate condition parcels.

Introduced Shrub

- 7.3.3 All 0.007 ha of introduced shrub will be retained during this project.

Individual trees

- 7.3.4 Individual trees on site are retained, where possible, by the development proposals. 0.0529 ha of trees will be retained by the development; these consist of three of the four small Juneberry trees (0.0122 ha) and all four of the trees in the south of the site (0.0407 ha).

7.4 Created Area Biodiversity Units

Developed Land; Sealed Surface

- 7.4.1 In order for the extensions and walls to be constructed, 0.03 ha of developed land; sealed surface will be created. This very low distinctiveness habitat type has no ecological value and does not contribute to the units gained on site.

Individual trees

- 7.4.2 For trading rules to be met and BNG to be achieved, 37 small trees will have to be planted and managed in moderate condition. This medium distinctiveness habitat type will cover an area of 0.1506 ha.
- 7.4.3 To achieve moderate condition, criteria A, B, and F will be targeted meaning that the trees planted are all native, groups of trees will have a predominately continuous canopy with gaps making up less than 10% of the total area and no gap being greater than 5m wide, and more than 20% of the tree canopy is overhanging vegetation. It is not believed that criteria C and E can be achieved as the trees will likely not mature in the 30-year period for BNG and no significant ecological niches will develop. Criterion D will not be targeted due to the close proximity to humans which may result in adverse impact to tree health, additionally, management interventions may have to take place such as pruning regimes which would result in the failure of this criterion.

7.5 Enhanced Area Biodiversity Units

Grassland

- 7.5.1 A 0.06 ha section of A1 will be enhanced from modified grassland in poor condition to other neutral grassland in moderate condition. This will be an increase in habitat distinctiveness from low to medium which will help generate units on site in order for BNG to be met on site.
- 7.5.2 For this area to achieve moderate condition, criteria A, B, D, and E will be targeted, this means that the area is a good example of an other neutral grassland habitat by having all four of the botanical indicators (more than 8 species/m², at least 20% of forb cover, one or more grass species that is not sown for intensive agricultural activities, and less than 30% cover of Rye-grass and/or White Clover), a varied sward of at least 20% greater than and 20% less than 7cm in height, cover of bracken is less than 20% and cover of scrub is less than 5%, and species indicative of suboptimal conditions and physical damage will be less than 5% of the total area. Criteria C and F will not be targeted as it is unlikely that more than 10 species/m² will be present and bare ground cover may exceed 5% due to the area's proximity to the pavement.

7.6 Created Linear Biodiversity Units

- 7.6.1 0.118km of species rich native hedgerow will be planted in front of the campus to the south of the site. In order for hedgerows to be native, there needs to be at least five species in each 30m surveyed section.
- 7.6.2 This hedgerow will be managed in moderate condition by targeted criteria B1, B2, C2, D1, and D2. A1 and A2 will not be targeted to allow to more space for individual tree planting and so the hedge does not screen the campus from the road. Additionally, C1 will not be targeted as it will be adjacent to the pavement resulting in disturbed vegetation.

8 SUMMARY OF ONSITE BIODIVERSITY CHANGE

- 8.1 The project results in a 0.22 unit, or 13.8%, gain in area biodiversity onsite and obtains the mandatory 10% BNG. In addition, trading rules have been met due to the creation of trees and enhancement of grassland.

- 8.2 The project results in a 0.79 unit, or 100%, gain in hedgerow units onsite.

FINAL RESULTS		
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	<i>Area habitat units</i>	0.22
	<i>Hedgerow units</i>	0.79
	<i>Watercourse units</i>	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	<i>Area habitat units</i>	13.80%
	<i>Hedgerow units</i>	N/A
	<i>Watercourse units</i>	0.00%
Trading rules satisfied?	Yes ✓	

Figure 8 BNG headline results

9 BIODIVERSITY NET GAIN PRINCIPLES

9.1 The following table provides information on how the BNG principals have been applied within this project.

Table 1 BNG principles

PRINCIPLE	APPLICATION TO PROJECT
Principle 1: Apply the mitigation hierarchy	Key habitats have been retained and enhanced where possible within this scheme. This includes the individual trees to the south and north of the site and the grassland across the different habitat parcels.
Principle 2: Avoid losing biodiversity that cannot be offset by gains elsewhere	No irreplaceable habitats have been affected by these proposals and no biodiversity lost by the development cannot be offset to achieve a net gain.
Principle 3: Be inclusive and equitable	The process of designing, implementing, and monitoring the landscape on site for Biodiversity Net Gain within this project has and will continue to be a collaborative effort across multiple teams and engaged stakeholders.
Principle 4: Address risk	Difficulty, uncertainty, and other risks to achieving net gain have been avoided by the proposals. Only where habitats are committed to enhancement have they been recorded as enhanced within the metric. The creation of sustainably managed habitats which generate an immediate uplift has added contingency when calculating biodiversity losses and gains in order to account for any remaining risks, as well as to compensate for the time between the losses occurring and the gains being fully realised.
Principle 5: Make a measurable net gain contribution	The existing onsite habitats which provide the biggest gain to biodiversity will be retained and enhanced by this project and an overall gain for biodiversity is achieved on site.
Principle 6: Achieve the best outcomes for biodiversity.	The best outcomes for biodiversity by have been achieved by: • Delivering compensation that is ecologically equivalent in type, amount and condition, and that accounts for the location and timing of biodiversity losses; • Enhancing existing or creating new habitat; • Enhancing ecological connectivity by creating bigger and better areas for biodiversity.
Principle 7: Be additional	The total net change in area habitat units is 13.8%, and hedgerows have been created despite no requirement for linear hedgerow unit generation within the BNG on site

Principle 8: Create a net gain legacy	Biodiversity Net Gain for this project will generate long-term benefits by: • Undergoing adaptive and sustainable management following a HMMP; • Creating resilient habitats which will provide protection from external environmental factors, e.g., climate change, such as individual trees.
Principle 9: Optimise sustainability	Biodiversity Net Gain has been achieved with a sustainable management plan at the forefront of design decisions.
Principle 10: Be transparent	Any and all Biodiversity Net Gain activities have and will be communicated in a transparent and timely manner with all stakeholders.

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10 CONCLUSIONS

Based on the DEFRA Statutory Metric the habitats will generate a gain of 13.8% in area biodiversity and a gain of 100% for hedgerow habitat onsite. This will be achieved by the planting of 37 individual trees and enhancement of grassland habitat on site to compensate for the loss of units due to the creation of a wall and two extensions, and the creation of hedgerows.

11 REFERENCES

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APPENDIX 1 POLICY AND LEGISLATION

11.1 Statutory Framework

- 11.1.1 Biodiversity net gain is a way of creating and improving biodiversity by requiring development to have a positive impact ('net gain') on biodiversity.
- 11.1.2 In England, biodiversity net gain is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). This is referred to as biodiversity net gain in Planning Practice Guidance to distinguish it from other or more general biodiversity gains.
- 11.1.3 Under the statutory framework for biodiversity net gain, every grant of planning permission is deemed to have been granted subject to a general biodiversity gain condition to secure the biodiversity gain objective. This objective is to deliver at least a 10% increase in relation to the pre-development biodiversity value of the development granted permission. This increase can be achieved through onsite biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits.
- 11.1.4 The general biodiversity gain condition is a pre-commencement condition: once planning permission has been granted, a Biodiversity Gain Plan must be submitted and approved by the planning authority before commencement of the development. There are exemptions and transitional arrangements which disapply the condition from certain planning permissions, as well as special modifications for planning permissions for phased development and the treatment of irreplaceable habitats.
- 11.1.5 The statutory framework for biodiversity net gain also includes provisions about information requirements for planning applications and the treatment of the condition on planning decision notices.

11.2 Environment Act 2021

- 11.2.1 The Act requires a minimum of 10% net gain for biodiversity as a condition of planning permission.
- 11.2.2 Net gain is to be measured by the biodiversity metric published by the Secretary of State. The Act requires that gains must be secured for a minimum of 30 years post completion of development. Also, under Section 40 the NERC Act 2006, as amended by the Environment Act 2021, “A public authority which has any functions exercisable in relation to England must from time-to-time consider what action the authority can properly take, consistently with the proper exercise of its functions, to further the general biodiversity objective.”...the biodiversity objective is, “...the conservation and enhancement of biodiversity in England through the exercise of functions in relation to England”. This is referred to as the Biodiversity Duty.
- 11.2.3 The Environment Act received Royal Assent in November 2021, meaning that by February 2024 the expectation for all planning permissions to include a biodiversity net gain of at least 10% will become a legal requirement.

11.3 National Planning Policy Framework

- 11.3.1 The National Planning Policy Framework (NPPF) sets out planning policy for England. Paragraphs of particular relevance from the NPPF are listed below:
- 11.3.2 Paragraph 180 states “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”.
- 11.3.3 Paragraph 185 states “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.”
- 11.3.4 Paragraph 186 states “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.”

11.4 UK Governments 25 Year Environment Plan

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

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

11.5 Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem

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

11.6 NERC Act

11.6.1 The Natural Environment and Rural Countryside (NERC) Act (HMSO, 2006) requires public bodies, including local authorities, 'to have regard to the conservation of biodiversity in England when carrying out their normal functions'. Section 40 sets out that:

- Paragraph 1. "Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity";
- Paragraph 3. "Conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat".
- Section 41 sets out that: Paragraph 1. "The Secretary of State must... publish a list of the living organisms and types of habitat ... of principal importance for the purpose of conserving biodiversity" based on consultation with Natural England; and that Every planning authority must "a) take such steps... to further the conservation of the living organisms and types of habitat included in any list published under this section, or (b) promote the taking by others of such steps".

APPENDIX 2 CONDITION ASSESSMENT SHEETS

Parcel Reference	Habitat Type	Assessment	Condition	Failed Criteria
A3	Modified grassland	Habitat Description: Two areas of amenity grassland Is the site located in Wales, and is therefore BNG exempt?: no There are 6-8 vascular plant species per m2 present, including at least 2 forbs (the undesirable species list). Note - this criterion is essential for achieving Moderate or Good condition.: pass Evidence: An average 6 species were recorded per quadrat within the grassland. 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.: fail Evidence: Cut and managed short, all below 7cm Some scattered scrub (including bramble <i>Rubus fruticosus</i> agg.) may be present, but scrub accounts for less than 20% of total grassland area. Note - patches of scrub with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.: pass Evidence: No scrub 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.: fail Evidence: Abundant litter and excessive bare ground from recreational pressure within campua grounds Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens)2.: fail	Moderate	Failed criteria 2, 4 and 5

Parcel Reference	Habitat Type	Assessment	Condition	Failed Criteria
		Evidence: Bare ground is estimated to comprise 20% of the grassland area Cover of bracken <i>Pteridium aquilinum</i> is less than 20%.: pass Evidence: No Bracken found on site There is an absence of invasive non-native plant species³ (as listed on Schedule 9 of WCA4).: pass Evidence: No invasive schedule 9 species were found within the habitat.		

Condition scoring reference – Grassland (low distinctiveness)

Condition Assessment Result	Condition Assessment Score	Achieved
Passes 6 or 7 criteria, including essential criterion A.	Good (3)	
Passes 4 or 5 criteria, including essential criterion A.	Moderate (2)	Achieved
Passes 3 or fewer criteria; OR passes 4-6 criteria excluding criterion A.	Poor (1)	

Parcel Reference	Habitat Type	Assessment	Condition	Failed Criteria
A4	Modified grassland	Habitat Description: Linear section of amenity grassland Is the site located in Wales, and is therefore BNG exempt?: no There are 6-8 vascular plant species per m² present, including at least 2 forbs (the undesirable species list). Note - this criterion is essential for achieving Moderate or Good condition.: pass Evidence: An average 8 species were recorded per quadrat within the grassland. 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.: fail Evidence: Cut and managed short all below 7cm	Moderate	Failed criteria 2 and 4

Parcel Reference	Habitat Type	Assessment	Condition	Failed Criteria
		Some scattered scrub (including bramble <i>Rubus fruticosus</i> agg.) may be present, but scrub accounts for less than 20% of total grassland area. Note - patches of scrub with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.: pass Evidence: No scrub present 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.: fail Evidence: Frequent cutting has resulted in poor growth, low herb cover, and some areas are drying out Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens)2.: pass Evidence: Some bare ground but n Below 10% threshold Cover of bracken <i>Pteridium aquilinum</i> is less than 20%.: pass Evidence: No Bracken found within grassland There is an absence of invasive non-native plant species3 (as listed on Schedule 9 of WCA4).: pass Evidence: No invasive schedule 9 species were found within the habitat.		

Condition scoring reference – Grassland (low distinctiveness)

Condition Assessment Result	Condition Assessment Score	Achieved
Passes 6 or 7 criteria, including essential criterion A.	Good (3)	
Passes 4 or 5 criteria, including essential criterion A.	Moderate (2)	Achieved
Passes 3 or fewer criteria; OR passes 4-6 criteria excluding criterion A.	Poor (1)	

Parcel Reference	Habitat Type	Assessment	Condition	Failed Criteria
A2	Modified grassland	Habitat Description: Amenity grassland which is in semi shade due to structure and scattered trees. There are stands of herbs in sections including creeping cinquefoil adjacent to the grassland. One stand of pendulous sedge and a single blackthorn Is the site located in Wales, and is therefore BNG exempt?: no There are 6-8 vascular plant species per m2 present, including at least 2 forbs (the undesirable species list). Note - this criterion is essential for achieving Moderate or Good condition.: fail Evidence: An average 5 species were recorded per quadrat within the grassland. 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.: fail Evidence: Cut and managed short below 7cm Some scattered scrub (including bramble <i>Rubus fruticosus</i> agg.) may be present, but scrub accounts for less than 20% of total grassland area. Note - patches of scrub with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.: pass Evidence: No scrub present 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.: pass Evidence: No damage recorded within grassland Cover of bare ground is between 1% and 10%, including localised areas (for	Poor	Failed criteria 1 and 2

Parcel Reference	Habitat Type	Assessment	Condition	Failed Criteria
		example, a concentration of rabbit warrens)2.: pass Evidence: Some bare ground patches present but less than 5% or cover Cover of bracken Pteridium aquilinum is less than 20%.: pass Evidence: No Bracken found on site There is an absence of invasive non-native plant species3 (as listed on Schedule 9 of WCA4).: pass Evidence: No invasive schedule 9 species were found within the habitat.		

Condition scoring reference – Grassland (low distinctiveness)

Condition Assessment Result	Condition Assessment Score	Achieved
Passes 6 or 7 criteria, including essential criterion A.	Good (3)	
Passes 4 or 5 criteria, including essential criterion A.	Moderate (2)	
Passes 3 or fewer criteria; OR passes 4-6 criteria excluding criterion A.	Poor (1)	Achieved

Parcel Reference	Habitat Type	Assessment	Condition	Failed Criteria
A1	Modified grassland	Habitat Description: 2 sections adjacent to the road, bus stop. Contains trees and had been suggested for enhancement Is the site located in Wales, and is therefore BNG exempt?: no There are 6-8 vascular plant species per m2 present, including at least 2 forbs (the undesirable species list). Note - this criterion is essential for achieving Moderate or Good condition.: fail Evidence: An average 3.66666666666667 species were recorded per quadrat within the grassland. Sward height is varied (at least 20% of the sward is less than 7 cm and at least	Poor	Failed criteria 1 and 2

Parcel Reference	Habitat Type	Assessment	Condition	Failed Criteria
		20% is more than 7 cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed.: fail Evidence: All below 7cm cut and maintain as amenity Some scattered scrub (including bramble Rubus fruticosus agg.) may be present, but scrub accounts for less than 20% of total grassland area. Note - patches of scrub with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.: pass Evidence: None 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.: pass Evidence: Minor damage present, less than 5%. Some bare ground under tree but not significant damage Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens)2.: pass Evidence: Between 1% and 10%, very minor. Some present but less than 5% of sward Cover of bracken Pteridium aquilinum is less than 20%.: pass Evidence: No Bracken found on site There is an absence of invasive non-native plant species3 (as listed on Schedule 9 of WCA4).: pass Evidence: No invasive schedule 9 species were found within the habitat.		

Condition scoring reference – Grassland (low distinctiveness)

Condition Assessment Result	Condition Assessment Score	Achieved
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Passes 6 or 7 criteria, including essential criterion A.	Good (3)	
Passes 4 or 5 criteria, including essential criterion A.	Moderate (2)	
Passes 3 or fewer criteria; OR passes 4-6 criteria excluding criterion A.	Poor (1)	Achieved

Parcel Reference	Habitat Type	Assessment	Condition	Failed Criteria
A6	Modified grassland	Habitat Description: Linear strip of grass alongside road Is the site located in Wales, and is therefore BNG exempt?: no There are 6-8 vascular plant species per m2 present, including at least 2 forbs (the undesirable species list). Note - this criterion is essential for achieving Moderate or Good condition.: fail Evidence: An average 4 species were recorded per quadrat within the grassland. 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.: fail Evidence: Cut and maintained as short amenity sward Some scattered scrub (including bramble <i>Rubus fruticosus</i> agg.) may be present, but scrub accounts for less than 20% of total grassland area. Note - patches of scrub with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.: pass Evidence: No scrub 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.: fail Evidence: Litter present, cut short and dying off in hot weather	Poor	Failed criteria 1, 2, 4 and 5

Parcel Reference	Habitat Type	Assessment	Condition	Failed Criteria
		Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens)2.: fail Evidence: Bare ground estimated to be 20% Cover of bracken <i>Pteridium aquilinum</i> is less than 20%.: pass Evidence: No Bracken found on site There is an absence of invasive non-native plant species3 (as listed on Schedule 9 of WCA4).: pass Evidence: No invasive schedule 9 species were found within the habitat.		

Condition scoring reference – Grassland (low distinctiveness)

Condition Assessment Result	Condition Assessment Score	Achieved
Passes 6 or 7 criteria, including essential criterion A.	Good (3)	
Passes 4 or 5 criteria, including essential criterion A.	Moderate (2)	
Passes 3 or fewer criteria; OR passes 4-6 criteria excluding criterion A.	Poor (1)	Achieved

Parcel Reference	Habitat Type	Assessment	Condition	Failed Criteria
Trees in north of site	Urban Tree	Habitat Description: Four ornamental trees within grassland area Is the site located in Wales and is therefore BNG exempt?: no The tree is a native species (or at least 70% within the block are native species).: fail Evidence: All Juneberry, <i>Amelanchier</i> The tree canopy is predominantly continuous, with gaps in canopy cover making up 5 m wide (individual trees automatically pass this criterion).: fail Evidence: Tree group is split and as a result the canopy is not continuous The tree is mature (or more than 50% within the block are mature).: fail	Poor	Failed criteria 1, 2, 3 and 5

Parcel Reference	Habitat Type	Assessment	Condition	Failed Criteria
		Evidence: Young trees <20 years estimate 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.: pass Evidence: No obvious detrimental effects or disturbance recorded Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.: fail Evidence: None present More than 20% of the tree canopy area is oversailing vegetation beneath.: pass Evidence: Within grassland but branches do overlap hardstanding for approx 20%		

Condition scoring reference – Individual Trees

Condition Assessment Result	Condition Assessment Score	Achieved
Passes 5 or 6 criteria.	Good (3)	
Passes 3 or 4 criteria.	Moderate (2)	
Passes 2 or fewer criteria.	Poor (1)	Achieved

Parcel Reference	Habitat Type	Assessment	Condition	Failed Criteria
Trees in the centre of the site	Urban Tree	Habitat Description: Three ornamental silver birch in a group. To be removed Is the site located in Wales, and is therefore BNG exempt?: no The tree is a native species (or at least 70% within the block are native species).: pass Evidence: All silver birch	Good	Failed criteria 5

Parcel Reference	Habitat Type	Assessment	Condition	Failed Criteria
		The tree canopy is predominantly continuous, with gaps in canopy cover making up 5 m wide (individual trees automatically pass this criterion).: pass Evidence: Continuous within block The tree is mature (or more than 50% within the block are mature).: pass Evidence: Expected at least 1/3rd of full height for species 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.: pass Evidence: None recorded Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.: fail Evidence: No significant features More than 20% of the tree canopy area is oversailing vegetation beneath.: pass Evidence: 90% oversailing vegetation		

Condition scoring reference – Individual Trees

Condition Assessment Result	Condition Assessment Score	Achieved
Passes 5 or 6 criteria.	Good (3)	Achieved
Passes 3 or 4 criteria.	Moderate (2)	
Passes 2 or fewer criteria.	Poor (1)	

APPENDIX 3 PROPOSED HABITAT CONDITION JUSTIFICATION

Table Enhanced Other Neutral Grassland

Criteria	Target pass/fail	Justification
Has the habitat been identified as acid grassland?	No	No
The grassland is a good representation of the habitat type it has been identified as, based on its UKHab description - the appearance and composition of the vegetation closely matches the characteristics of the specific grassland habitat type. Indicator s	Pass	It is expected that the long-term management of this area will reduce the nutrient load within the soil which will provide better conditions for herbaceous species which will, in turn, provide opportunities for indicator species.
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.	Pass	Management of this area will allow for 30% of the area to remain over 7cm.
Cover of bare ground between 1% and 5%, including localised areas, for example, rabbit warrens.	Fail	Due to the proximity to the entrance of the campus, human induced erosion could cause this criterion to fail and as such is not targeted.
Cover of bracken <i>Pteridium aquilinum</i> is less than 20% and cover of scrub (including bramble <i>Rubus fruticosus</i> agg.) is less than 5%.	Pass	No bracken is present on site and none to be introduced by works.
Combined cover of species indicative of sub-optimal condition ² 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	Pass	Sustainable appropriate management and restricted access should ensure this criterion remains passed.
There are 10 or more vascular plant species per m ² present, including forbs that are characteristic of the habitat type (species referenced in Footnote 2 and 4 cannot contribute towards this count).	Fail	It is not believed that more than 10 species/m ² will be possible to maintain.
Number of Criteria Passed:	4	
Condition	Moderate	

Table Created Individual tree in moderate condition

Criteria	Target pass/fail	Evidence
The tree is a native species (or at least 70% within the block are native species).	Pass	Only native trees will be planted by the planting scheme.

The tree canopy is predominantly continuous, with gaps in canopy cover making up 5 m wide (individual trees automatically pass this criterion).	Pass	Individual trees automatically pass this criterion. If trees are assessed in groups, four to five trees will be planted in close proximity for each grouping.
The tree is mature (or more than 50% within the block are mature).	Fail	Planted trees will be immature.
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 the	Fail	Trees will be pruned, and public access may result in damage.
Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	Fail	Young trees lack ecological niches.
More than 20% of the tree canopy area is oversailing vegetation beneath.	Pass	These trees will be within the proposed area of grassland.
Number of Criteria Passed:	3	
Condition	Moderate	