



**Winsley Road
Bradford on Avon
BA15 2HL**

**Biodiversity Statement and
Biodiversity Gain Plan**

Luscinia Ecology
On behalf of
Mr. & Mrs. Dustan



Document Properties

Reference	Revision	Date	Author	Reviewer
LUS24269 BS&BGP	Draft	28/05/2025	Mel Granato	Greg Nightingale
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Chapter 1: Biodiversity Statement

Do you believe that, if the development is granted permission, the general Biodiversity Gain Condition (as set out in Paragraph 13 of Schedule 7A of the Town and Country Planning Act 1990 (as amended) would apply?	Yes
Please provide the pre-development biodiversity value of the onsite habitats on the date of the calculation. <i>- If the planning portal only allows a single figure, we advise that the largest figure is used</i>	Habitat: 4.30 Hedgerow: 0.00 Watercourse: 0.00
Please provide the date the onsite pre-development biodiversity value was calculated.	Date of submission
If an earlier date, to the date of the planning application, has been used, please provide details why this date has been used.	N/A
Which version of the biodiversity metric was used?	The Statutory Biodiversity Metric
When was the version of the biodiversity metric used published?	06/08/24
Please provide the reference or supporting document/plan names for the: 'Biodiversity metric calculation', 'Onsite irreplaceable habitat (if any)', and 'Onsite habitats existing on the date of the application for planning permission (if applicable)'.	LUS24269 BS&BGP
Does the pre-development biodiversity value and date used above factor in the loss of any onsite habitat because of activities carried out before the submission of this application? (i.e., has degradation occurred?)	No, degradation has not occurred
Does the development site have irreplaceable habitats (corresponding to the description in column 1 of [Schedule to the biodiversity Gain Requirements (Irreplaceable Habitat) Regulations (2023)] which are: i. on land to which the application relates; and ii. existed on the date of the application for planning permission, (or an earlier agreed date)	No
The name and address of the person submitting this plan:	Charlotte Watkins LP Planning 31 Market Place Chippenham Wiltshire SN15 3HP
Luscinia Ecology Ltd has provided the above Biodiversity Statement and this report in good faith and using reasonable care and due diligence. However, in relation to statement around degradation and any associated retrospective assessment, Luscinia Ecology Ltd cannot be held accountable or liable for inaccuracies or alternative interpretations.	



Chapter 2: Summary

- 2.1 The Statutory Biodiversity Metric has been completed in relation to Winsley Road, Bradford on Avon, BA15 2HL.
- 2.2 Current Biodiversity Net Gain policy requirements relating to development in the Wiltshire District Council area require a 10% Biodiversity Net Gain outcome.
- 2.3 This assessment has been based upon a site visit and has been completed by an ecologist experienced in the Biodiversity Net Gain Assessment process. Full methods and assessments are included within this report. The completed Statutory Biodiversity Metric excel file will be submitted alongside this report.
- 2.4 Following the Mitigation Hierarchy and the Biodiversity Gain Hierarchy, the Proposed Development will not remove any irreplaceable habitats, or habitats of very high, high, or medium distinctiveness.
- 2.5 Proposed Development will result in a biodiversity net gain of 0.13 habitat units (+3.05%), with the Trading Rules not met. As there are no hedgerow or watercourse units in the baseline, there is no requirement to provide a net gain in these units. However, a total of 0.25 hedgerow units will be delivered (a percentage is not calculable).
- 2.6 Therefore, the Proposed Development will meet current policy requirements in relation to Biodiversity Net Gain via biodiversity offsetting.
- 2.7 This assessment has been undertaken using detailed design. The measures within this report should be secured by conditions for a Soft Landscape Plan and a Habitat Maintenance and Monitoring Plan.
- 2.8 The applicant is aware of, and has committed to, all the mitigation, compensation, and enhancement measures set out within this report.
- 2.9 Based on the results from the survey, context of the Site, and overall low ecological importance of the Site, this report is valid for a period of 18 months (i.e., the 01/10/2026).



Chapter 3: Introduction

Planning Context

- 3.1 This report sets out a Biodiversity Statement and Biodiversity Gain Plan in relation to Winsley Road, Bradford on Avon, BA15 2HL (referred to as 'the Site' throughout this report). This report is supported by a site visit undertaken on 01/04/2025 and a Preliminary Ecological Appraisal¹.
- 3.2 The Environment Act 2021 sets out a mandatory requirement for all planning permissions in England (with a few exemptions) to deliver a 10% Biodiversity Net Gain (BNG) using the Statutory Biodiversity Metric.
- 3.3 In accordance with the National Planning Policy Framework (NPPF)² proposals should seek to demonstrate BNG. The NPPF states:

"N1: Identifying environmental opportunities and safeguards

...

2. Development plans should only set local standards for biodiversity net gain which are in excess of the statutory net gain requirement where this is for specific site allocations, and is fully justified and deliverable. Local standards should not extend to categories of development which are exempt from statutory biodiversity net gain.

...

N2: Improving the natural environment

1. To contribute positively to the natural environment, and support nature's recovery, development proposals should:

a. Consider the environmental qualities of land proposed for development, including habitats, landscape character and the natural beauty of the countryside, and identify opportunities for those qualities to be conserved or enhanced (including through requirements for biodiversity net gain where these apply);

...

c. Take suitable opportunities to connect to and strengthen ecological networks that extend beyond the site, drawing on the measures proposed by Local Nature Recovery Strategies, National Forest Strategies and Community Forest Plans, where present, and other relevant assessments;

¹ Luscinia Ecology (2025). Winsley Road, Bradford on Avon, BA15 2HL: Preliminary Ecological Appraisal: LUS24269 PEA Submission. Luscinia Ecology, Bristol.

² MHCLG (2026). National Planning Policy Framework. August 2026. Ministry of Housing, Communities and Local Government, London.



3. Development proposals may incorporate biodiversity enhancements which exceed the statutory objective for biodiversity net gain, but this should only be a requirement where it is set out in up-to-date development plan policies for specific site allocations. Decision-makers should not give weight to other development plan policies which require biodiversity gains which go beyond the statutory framework, including where a policy requires gains for development proposals which are exempt.”

3.4 Core Policy 50 of the Wiltshire Core Strategy requires all development, including minor developments, to demonstrate no net loss of biodiversity.

3.5 There are no current local policies, Supplementary Planning Guidance, or Supplementary Planning Documents in the Wiltshire District Council area which relate to the BNG Assessment process. Wiltshire Council state:

‘...The Council's policy for BNG is being considered by the Local Plan Review with a view to increasing the minimum net gain to 20%. The outcome of the consultation is under consideration and will be reported to Cabinet and Council prior to submission to the Secretary of State...’

3.6 In accordance with Environment Act, NPPF, and Wiltshire Council policies, the Proposed Development has a targeted BNG outcome of at least 10%.

Site Description

3.7 The Site consists of an existing field and associated access. The Site is approximately 1.04ha in size and located at National Grid Reference: ST 81128 61301. The Site includes a soft landscape track which provides access from Winsley Road to the south. The Site is immediately surrounded by existing areas of farmland, along with scattered areas of residential and commercial development. The wider landscape is largely formed of farmland.





Figure 1. Aerial image – Site boundary in red line³

Proposed Development

- 3.8 This report will be submitted alongside a planning application for the seek permission for a change of use to a dog walking field, with an associated smaller shelter (referred to as the 'Proposed Development' throughout this report). Access will be via a track, which leads to Winsley Road to the south. The Proposed Development will result in the removal of the habitats within the Site and replacement with buildings, hardstanding. **Figure 2** shows the Proposed Development.

³ Image used under licence (©2024 Google): Accessed: 06/05/2025.



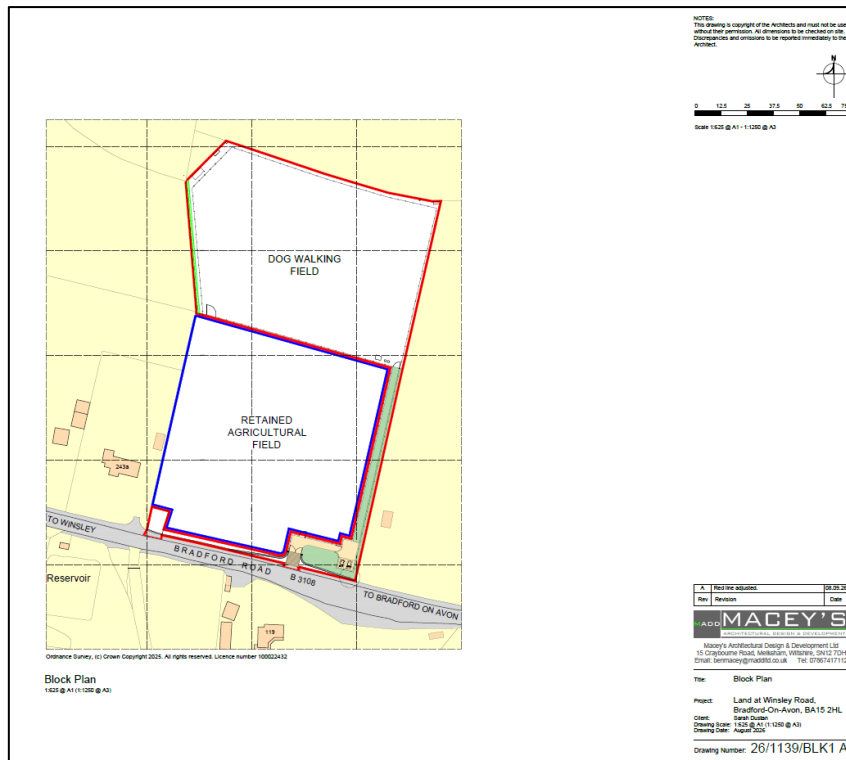


Figure 2. The Proposed Development

Purpose of this report

- 3.9 The purpose of this report is to provide sufficient information for the Local Planning Authority to fully assess the ecological impacts of the Proposed Development, via the BNG Assessment process.
- 3.10 The key objectives of this Biodiversity Statement and Biodiversity Gain Plan are to:
- Determine the BNG percentage required to be delivered by the Proposed Development.
 - Outline the BNG Assessment method, including any limitations, assumptions, clarifications, and/or deviations.
 - Follow the Mitigation Hierarchy and the Biodiversity Gain Hierarchy, and outline if irreplaceable habitats will be lost.
 - Undertake the BNG Assessment:
 - Determine the BNG on-site baseline using the data search, ecological reporting, BNG Condition Assessments, and The Statutory Biodiversity Metric.
 - Determine the BNG on-site post development outcome, using the details within **Figure 2**.
 - Compare the on-site baseline with the on-site post development outcome to determine the overall BNG net change.
 - Outline the agreed management activities, including the identification of the On-site Significant Enhancements.



- Outline the agreed monitoring and adaptive management requirements.
- Determine if a require percentage increase in BNG has been achieved, or the measures required to achieve the BNG.



Chapter 4: Method

Biodiversity Net Gain

- 4.1 Calculations have been carried out with regards to Biodiversity Net Gain: Good Practice Principles for Development guidance⁴ and in line with the Statutory Biodiversity Metric guideline⁵. **Appendix A** sets out how each of the BNG Good Practice Principles⁶ have been applied. In this way, this report meets **Principle 3** of The Statutory Biodiversity Metric.
- 4.2 The Statutory Biodiversity Metric is the established method for calculating BNG and provides a quantitative approach to losses and gains resulting from development or land management changes. Whilst The Statutory Biodiversity Metric is the default system of calculating BNG, it should not be considered a complete tool in assessing BNG and therefore professional judgement has been used where appropriate (this includes consideration of Environmental Net Gain (ENG)). Where professional judgement has been used, this is outlined in the text, and additional references have been provided. This is in line with **Principles 4 and 6** of The Statutory Biodiversity Metric:

“Principle 4: This biodiversity metric is not a complex or comprehensive ecological model and is not a substitute for expert ecological advice.”

...

Principle 6: This biodiversity metric is designed to inform decisions in conjunction with locally relevant evidence, expert input, or guidance.”

Site Visit

- 4.3 The Site was surveyed using the UK Habitat Classification Survey⁷ method on 01/04/2025. The method classified the Site into areas of similar botanical community types with a representative sample of those species present at the time of the survey being described. The vegetation present was clearly visible and allowed an accurate assessment to be made. During the Site survey, The Statutory Biodiversity Metric Condition Assessment sheets⁸ were used to gather the necessary ecological information to determine the condition of the habitats present within the Site.
- 4.4 A UK Habitat Classification Plan was produced (**Figure 3**), which formed the On-Site Baseline Map.

⁴ Baker J., Hoskins R., and Butterworth T. (2019). *Biodiversity Net Gain. Good practice principles for development: A practical guide*. Ciria, London.

⁵ Defra (2024). *The Statutory Biodiversity Metric: User Guide: Date July 23rd 2024*. Department for Environment food and rural affairs, London.

⁶ Baker J., Hoskins R., and Butterworth T. (2016). *Biodiversity Net Gain. Good practice principles for development*. Ciria, London.

⁷ UKHab Ltd (2023). *UK Habitat Classification Version 2.0*. UKHab Ltd, Stockport.

⁸ Defra (2024). *The Statutory Biodiversity Metric: Technical Annex 1: Condition Assessment Sheets and Methodology: Date February 2024*. Department for Environment food and rural affairs, London.





Figure 3. UK Habitat Classification Plan

- 4.5 Based on the results of the surveys used to inform this assessment, the context of the Site, and the high likelihood that the habitats within the Site will not change significantly over time, this report is valid for a period of 18 months (i.e., the 01/10/2026). It is reasoned that there would be no material change on Site within this time period. This is reasoned in line with good practice guidelines⁹.

Baseline Calculation

- 4.6 To calculate the baseline area and linear units for the Site the following data and assessments were undertaken:
- The UK Habitat Classification habitats were converted, where necessary into the relevant habitats within The Statutory Biodiversity Metric.
 - The UK Habitat Classification 25m² rule was applied¹⁰.
 - The habitats were then assigned a pre-set distinctiveness grade¹¹.
 - The area (hectares) of each habitat parcel and length of linear habitats (km) within the Site was calculated from the On-site Baseline Map (**Figure 3**).
 - Scattered trees were calculated using the Tree Helper Tool, following the size guidelines within The Statutory Biodiversity Metric User Guide and using either data collected directly by the ecologist or via information within the Proposed

⁹ CIEEM (2019). Advice Note: *On the Lifespan of Ecological Reports and Surveys*. Chartered Institute for Ecology and Environmental Management, Winchester

¹⁰ Habitats occupying less than 25m² were absorbed and considered within the adjacent habitat(s).

¹¹ Indicative of the inherent 'value' of the habitat.



Development's Tree Schedule, with the use of a Tree Schedule taking precedence.

- Where applicable, habitats were subject to a 'condition assessment'¹².
- Habitats were subject to a strategic significance assessment¹³.

4.7 The baseline habitats (as detailed above) were entered into The Statutory Biodiversity Metric to calculate baseline biodiversity units for the Site.

Proposed Development Assessment

4.8 Using the Proposed Development shown **Figure 2**, an On-site Post Intervention Map (**Figure 4**) was produced.



Figure 4. On-site Post Intervention Map

4.9 In relation to created and enhanced habitats, all habitat interventions within this report are considered to be realistic and deliverable within the project time frame (in line with **Principle 7** of The Statutory Biodiversity Metric), along with the expected or agreed management resources and availability of funding.

4.10 The same process as for the baseline calculation was completed using the On-site Post Intervention Map (**Figure 4**), along with the following additional methods:

¹² The 'condition' of the habitat is a measure of habitat quality and measures the 'working-order' of the habitat against the optimal state of the habitat type.

¹³ Strategic significant is based upon the location of a habitat within the local landscape and whether the location has been formally identified in plans which identify local priorities for targeting biodiversity.



- The loss of baseline habitats was calculated by overlaying the footprint of the proposals onto the On-Site Baseline Map.
- The On-site Post Intervention Map was reviewed to identify habitats retained, enhanced, and/or created. The proposed habitats were subject to condition and strategic significance assessments.
- Where a new habitat or existing habitat has been created or enhanced, additional consideration has been given towards the time taken for habitats to establish and reach target condition (temporal multiplier), and the difficulty of habitat re-creation (difficulty multiplier). The 'Habitat creation in advance' and 'Delay in starting habitat creation' functions were set to 0 years. No advanced habitat creation is proposed, and there will be no 'delay between habitat loss and the start of habitat creation and enhancement works'.

Strategic Significance

- 4.11 Wiltshire Council is the authorising body for Bradford on Avon's Local Nature Recovery Strategy. Table 7 from the statutory BNG guidelines are being used to determine the strategic significance of the Site.
- 4.12 The Site is located within a strategically significant ecological area. The wider countryside measures for Wiltshire and Swindon for the Site consists of nature friendly farming, hedgerows and ponds. These habitats do not form part of this assessment.

Data Summary and Discussion

- 4.13 The Statutory Biodiversity Metric presents a detailed summaries of the resultant biodiversity unit change, separated by habitat type.
- 4.14 A biodiversity unit change has been provided habitat units, hedgerow units, and watercourse units. However, caution has been applied when interpreting these numbers. It is important to note that BNG should assess habitats in isolation and any unit losses or gains considered in detail. This assessment includes consideration of the effect of the proposals on each habitat group, and like-for-like replacement within broad habitat groups.
- 4.15 The discussion also considers the wider context of the planning application, surrounding landscape, wider ecological functions not captured by the BNG assessment process, and socio-economic values of the development, as well as considering how the Proposed Development contributes towards nature conservation priorities at the local, regional, and national levels. This approach is guided by Principles 6 and 9 of BNG Good Practice Principles⁶, along with **Principles 8 and 9** of The Statutory Biodiversity Metric:

"Principle 8 Created and enhanced habitats should be, where practical and reasonable, local to any impact and deliver strategically important outcomes for nature conservation.

...



Principle 9 This biodiversity metric does not enforce a minimum habitat size ratio for compensation of losses. Proposals should aim to:

- *maintain habitat extent - supporting more, bigger, better, and more joined up ecological networks*
- *ensure that proposed or retained habitat parcels are of sufficient size for ecological function*

4.16 Our digital data and mapping files are available upon request.

Limitations, Assumptions, and Clarifications

Limitations

4.17 The measurements within this report are approximate and the mapping of baseline habitats and proposed development plans has relied upon the plans provided by the client and/or project team. These plans were georeferenced. Mapping of habitats at a fine scale may result in minor deviations from realised measurements. Given the scale of the proposals, any deviations in spatial areas or point locations are sufficiently minor to be inconsequential. Nevertheless, this has been controlled for via advanced digitising tools and precautionary rounding.

Assumptions

4.18 The ash tree in the south-west of the Site is assumed to be a medium sized tree.

Clarifications

4.19 None

Contributor Information

4.20 The Site visit, BNG Condition Assessments, BNG Assessment, and BNG report were completed by Jenn Senft, Lorna Roberts and Mel Granato. A technical review of this assessment was undertaken by Greg Nightingale. **Table 1** outlines the relevant experience of the assessment contributors.



Contributor	Experience
Greg Nightingale BSc (Hons) MCIEEM	Greg is the Director of Luscinia Ecology with over 12 years of experience in ecology and environmental management in the private sector. Luscinia Ecology is a CIEEM Registered Practice and Greg Nightingale is a full member of the Chartered Institute of Ecology and Environmental Management (CIEEM). CIEEM act to govern best practice in the ecology sector. Greg has been working on BNG since 2017, prior to its inclusion within the National Planning Policy Framework (2018 revision) and the Environment Act 2021. This has included working with all the Defra Metrics, The Warwickshire Model, BREEAM 2018, and the Network Rail BNG Model. Greg has established and developed BNG systems and processes in three small to medium sized ecological consultancies and is highly experienced in the application of BNG at the site and local level, including delivering BNG offsetting and contributions via S106 Agreements, third parties, and brokers. within this, Greg is experienced in UK Habitat Classification, and BNG condition assessment. This includes the completion of the industry standard training courses for BNG, UK Habitat Classification, and the crossover training for BNG and UK Habitat Classification. He is an accredited Modular River Survey River Condition Assessment surveyor. His experience has also included habitat mapping and assessment via drones and aerial footage. In addition, he has completed a CIEEM training course on Environmental Net Gain and has a foundational understanding of The Environmental Benefits from Nature Tool and how this relates to the BNG assessment process.
Lorna Roberts BSc (Hons) MSc ACIEEM	Lorna is a passionate ecologist with over 13 years' experience, Lorna brings a range of ecological expertise and a pragmatic approach to client relationships and project management. Lorna's experience within the planning system ranges from initial identification of ecological constraints and opportunities, through to design and master planning, management of large-scale ecological impact assessments, stakeholder consultation, and design and implementation of post-planning management and monitoring strategies. Lorna is an accomplished field surveyor, experienced in a wide range of habitat/botanical and protected species surveys, and holds Natural England survey licences for bats and great crested newts. Lorna is particularly experienced in Habitats Regulations Assessment and has a proven track record of successful project delivery in the presence of often complex ecological constraints.
Jenn Senft BSc (Hons) Qualifying member of CIEEM	Jenn is an Assistant Ecologist within Luscinia Ecology, having graduated in 2023 with a 1st class degree in Biology. Jenn has theoretical knowledge and practical experience with the UK Habitat classification system, report writing, and wildlife legislation. She has a deep understanding of current and emerging challenges facing the environment, the impacts this has on people, and how these may be mitigated to suit both the client and the planet. With this knowledge and experience, Jenn provides a supporting role to offer robust ecological advice. Jenn is a Qualifying member of the Chartered Institute of Ecology and Environmental Management (CIEEM), working towards Qualifying status. She is currently developing her understanding in BNG through practical application and written reports within Luscinia Ecology, receiving internal training.



Mel Granato BSc (Hons) MSc Qualifying member of CIEEM	Mel is an Assistant Ecologist with Luscinia Ecology, Graduated in 2023 in Conservation Ecology. Mel has two publications, one of which can be found in the Journal of Insects (Granato <i>et al.</i>, 2024) and one in the Journal World (Granato <i>et al.</i>, 2025). Mel has practical experience and theoretical knowledge with bat, reptile, great crested newt, breeding bird surveys, technical report writing, UK Hab classification systems, biodiversity net gain metrics and QGIS. Mel is a Qualifying Member of the Chartered Institute of Ecology and Environmental Management. (CIEEM). Mel is actively working towards gaining a level 2 bat licence and level 1 great crested newt licence.
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Table 1. Contributor experience



Chapter 5: Baseline and Proposed Development

Irreplaceable habitats

5.1 No irreplaceable habitats will be removed as a result of the Proposed Development.

Baseline Assessment

5.2 The habitats present within the Site are set out below:

- **Grassland:** Other neutral grassland
- **Individual tree:** Rural tree
- **Sparsely vegetated land:** Ruderal/ephemeral
- **Urban:** Developed land; sealed surface

5.3 The assessment of the character, extent, condition, historic management, and species composition of these habitats is outlined within the PEA¹ and the condition assessment tables within **Appendix B**. Urban: Developed land; sealed surface does not require condition assessment.

Proposed Development Assessment

5.4 The below is based on the On-site Post Intervention Map shown in **Figure 4**. Assessment of the proposals is split into three sections, as detailed below:

- Retained/Lost habitats, which identifies habitats retained and protected during the implementation of the proposals and those to be removed.
- Enhanced Habitats, which assesses habitats which will be created as part of the proposals, and outlines measures as to how these habitats will reach target condition.
- Created Habitats, which assesses habitats which will be created as part of the proposals, and outlines measures as to how these habitats will reach target condition.

Habitats Retained/Lost

5.5 An area of other neutral grassland will be removed. The ruderal/ephemeral and developed land; sealed surface will be retained.

Habitats Enhanced

5.6 None of the retained habitats could be enhanced. This was due to the proposed use of the site as a dog exercising field.



Habitats Created

5.7 The Proposed Development will provide the following:

- **Grassland:** Modified grassland
- **Hedgerow:** Native hedgerow¹⁴
- **Individual trees:** Urban tree¹⁴
- **Urban:** Developed land; sealed surface

5.8 Developed land; sealed surface and introduced shrub is not considered to be on-site significant enhancements. The remaining created habitats are considered to be on-site significant enhancements¹⁴.

Grassland: Modified grassland

5.9 Modified grassland will be provided within the Proposed Development. This will be the areas of public grassland, road verges, and areas of landscaping around the open space. It's expected that these areas will be managed for amenity purposes due to pressure from new residents.

5.10 A 'moderate' condition can reasonably be achieved. Criteria relating to bare ground, bracken, species richness, and invasive species can reasonably be met.

Hedgerow: Native hedgerow¹⁴

5.11 A native hedgerow will be provided within the Proposed Development. This will be located along the western boundary of the Site. Species to include are alder *Alnus glutinosa*, common beech *Fagus sylvatica*, blackthorn *Prunus spinosa*, field maple *Acer campestre* and hawthorn *Crataegus monogyna*.

Individual trees: Urban tree¹⁴

5.12 Tree planting is included within the Proposed Development across the new landscaping of the Site. A moderate condition for the trees located in sustainable locations can reasonably be achieved. Criteria relating to native species, continuous tree canopy, good health, and oversailing vegetation can reasonably be met.

Urban: Developed land; sealed surface

5.13 This habitat is not discussed further as it is of negligible importance and does not require a condition assessment.

¹⁴ A legal agreement or planning condition is required.



Chapter 6: Results and Summary

6.1 Decision making during the development of the proposals has been informed and influenced by the Biodiversity Net Gain: Good Practice Principles for Development guidance⁶ to ensure these obligations for achieving BNG have been met. In addition, throughout the construction of the Proposed Development, these principles will be adhered to.

Results

6.2 Proposed Development will result in a biodiversity net gain of 0.13 habitat units (+3.05%), with the Trading Rules not met (**Figure 5**). As there are no hedgerow or watercourse units in the baseline, there is no requirement to provide a net gain in these units. However, a total of 0.25 hedgerow units will be delivered (a percentage is not calculable).

FINAL RESULTS		
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	<i>Habitat units</i>	0.13
	<i>Hedgerow units</i>	0.25
	<i>Watercourse units</i>	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	<i>Habitat units</i>	3.05%
	<i>Hedgerow units</i>	N/A
	<i>Watercourse units</i>	0.00%
Trading rules satisfied?	No - Check Trading Summaries ▲	

Figure 5. Headline results of The Statutory Biodiversity Metric

Biodiversity Gain Hierarchy

6.3 Application of the Biodiversity Gain Hierarchy is a mandatory material consideration. The Proposed Development implemented the Biodiversity Gain Hierarchy as follows:

- **Avoidance** – The Proposed Development will be located on a grazed field.
- **Avoidance** – The Proposed Development will not remove any irreplaceable habitats, or habitats of very high or high distinctiveness.
- **Avoidance** – The Proposed Development has limited the loss of habitat on Site as far as reasonably possible:
 - The Proposed Development will retain ~1.7ha of other neutral grassland
- **Mitigation** – The Proposed Development will protect retained habitats and will minimised impacts on these habitats¹.
- **Enhancement** – Opportunities for habitat enhancement within the Site have been explored and realistic opportunities and interventions have been agreed:



- 0.1ha of other neutral grassland 'poor' will be enhanced to "fairly good". This is the minimum area required to satisfy the Trading Rules. To achieve this the Proposed Development will increase species diversity to 10 or more vascular plant species per m² present, including forbs that are characteristic of the habitat type.
- **Creation** – A number of new native tree groups will be planted.
- **Offsetting** – This is not required as the above process has insured that a BNG can be delivered within the Site.
- **Offsetting** – Is required and has followed / will follow the biodiversity gain hierarchy in relation to securing Biodiversity Units / Credits.

Summary

- 6.4 The Proposed Development will meet legislation and policy requirements in relation to Biodiversity Net Gain. The biodiversity gain condition, which applies to the Proposed Development, is capable of being discharged.
- 6.5 We advise that a planning condition should be sufficient to secure the long-term management and maintenance of the on-site significant enhancements contained within this report[^].
- 6.6 We reason that sufficient information is contained within this report in relation to habitat management and monitoring. Therefore, we reason that a draft Habitat Management and Monitoring Plan (HMMP) is not required prior to determination.
- 6.7 The above Biodiversity Net Gain Assessment is based upon the information available at the time of the assessment. A planning condition will be required to ensure that the contents of this assessment are reflected within the Soft Landscape Proposals and an associated Habitat Maintenance and Monitoring Plan.



Appendix A: Delivery of Good Practice Principles

BNG Principle	Application
Principle 1. Apply the Mitigation Hierarchy <i>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.</i> Principle 2. Avoid losing biodiversity that cannot be offset by gains elsewhere <i>Avoid impacts on irreplaceable biodiversity – these impacts cannot be offset to achieve No Net Loss or Net Gain.</i> Principle 3. Be inclusive and equitable <i>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.</i>	The Proposed Development is located on a previously grazed field. The Mitigation Hierarchy and the Biodiversity Gain Hierarchy have been applied throughout the planning and design process. The features of ecological importance within the Site will be retained and enhanced as part of the Proposed Development. There will be no loss of irreplaceable habitats and the habitats lost are replaceable or were unnatural/modified in nature. Engagement with stakeholders, including local residents and the Local Planning Authority will be undertaken as part of the planning application.
Principle 4. Address risks <i>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 the losses occurring and the gains being fully realised.</i>	Any limitations from the habitat survey and previous survey work have been considered and the precautionary principle applied during the baseline and proposed assessment where required. The Proposed Development assessment primarily uses basic habitats which require limited management to achieve the proposed outcomes. There is a clear statement in relation to the outcome of the Trading Rules. All other risks are dealt with via the Ecological Impact Assessment process and/or planning conditions, where considered required.
Principle 5. Make a measurable Net Gain <i>Achieve a measurable, overall gain for biodiversity and the services ecosystems provide while directly contributing towards nature conservation priorities.</i>	The Statutory Biodiversity Metric has been used. Use of the 'Environmental Benefits from Nature Tool' to consider ecosystem services is not yet part of policy and voluntary use was not considered proportionate to the nature and scope of this Proposed Development.
Principle 6. Achieve the best outcomes for biodiversity <i>Achieve the best outcomes for biodiversity by using robust, credible evidence and local knowledge to make clearly-justified choices when:</i> <i>Delivering compensation that is ecologically equivalent in type, amount and condition, and that accounts for the location and timing of biodiversity losses.</i> <i>Compensating for losses of one type of biodiversity by providing a different type that delivers greater benefits for nature conservation</i> <i>Achieving Net Gain locally to the development while also contributing towards nature conservation priorities at local, regional and national levels.</i> <i>Enhancing existing or creating new habitat.</i> <i>Enhancing ecological connectivity by creating more bigger, better and joined areas for biodiversity.</i> Principle 7. Be additional <i>Achieve nature conservation outcomes that demonstrably exceed existing obligations (i.e. do not deliver something that would occur anyway).</i>	The loss of ecologically important habitats has been avoided. The BNG assessment process has ensured that the ecological compensation provided is ecologically equivalent in type, amount, and condition. The Trading Rules have been met. The local environment and local wildlife priorities have been considered through the Ecological Impact Assessment process, namely via the provision of enhancement which target NERC/BAP species. The additionality principle has not been contravened.
Principle 8. Create a Net Gain legacy <i>Ensure Net Gain generates long-term benefits by:</i> <i>Engaging stakeholders and jointly agreeing practical solutions that secure Net Gain in perpetuity.</i> <i>Planning for adaptive management and securing dedicated funding for long-term management.</i> <i>Designing Net Gain for biodiversity to be resilient to external factors, especially climate change.</i> <i>Mitigating risks from other land uses.</i> <i>Avoiding displacing harmful activities from one location to another.</i> <i>Supporting local-level management of Net Gain activities.</i>	Engagement with stakeholders, including local residents and the Local Planning Authority will be undertaken as part of the planning application. New landscaping and structural planting are proposed, and this includes new hedgerows and tree planting These measures will increase the habitat structure, the interconnectivity of the Site and surrounding areas, and the overall species diversity within the Site. This will provide increases in opportunities for wildlife, as well as an overall increase in the permeability of the Site for wildlife. The overall impact on habitats from the Proposed Development will be a significant positive via the implementation of the biodiversity offsetting process. This will be the BNG legacy of the Site.
Principle 9. Optimise Sustainability <i>Prioritise Biodiversity Net Gain and, where possible, optimise the wider environmental benefits for a sustainable society and economy.</i>	Use of the 'Environmental Benefits from Nature Tool' to consider ecosystem services is not yet part of policy and voluntary use was not considered proportionate to the nature and scope of this Proposed Development.



Principle 10. Be transparent
Communicate all Net Gain activities in a transparent and timely manner, sharing the learning with all stakeholders.

The surveys and data that underpin this assessment have been made clear, including any limitations and assumptions. The methods used in this assessment are clearly set out in the method and follows guidelines. The assessment outcomes have been explained in full. This includes the inclusion of notes within the excel file to explain reasoning and full explanations for how existing and proposed habitat conditions will be achieved. Next steps, and the measures required to ensure this Biodiversity Net Gain Assessment outcome will be achieved, have been clearly set out within the Summary and Discussion. This includes a statement that outlines the recommended next steps. All requirements within this report have been discussed and agreed with the Applicant.



Appendix B: Condition Assessment Tables

UKHabs Classification:		Other neutral grassland
Condition Sheet:		Grassland (medium, high and very high distinctiveness)
Survey Date and Surveyor:		01/04/2025 – Jenn Senft and Lorna Roberts
Condition Assessment Criteria		
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. Note - this criterion is essential for achieving Moderate or Good condition for non-acid grassland types only.	Fail – Grasses present are commonly sown for intense agriculture, the broadleaved herb cover was below 20%, and there were fewer than eight species present per m ² .
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.	Pass – The sward height was overall short but at least 20% was 10cm or above.
C	Cover of bare ground is between 1% and 5%, including localised areas, for example, rabbit warrens.	Pass – Mammal holes and paths were present but bare ground cover did not exceed 5%.
D	Cover of bracken is less than 20% and cover of scrub (including bramble) is less than 5%.	Pass – No bracken was present.
E	Combined cover of species indicative of suboptimal condition 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. If any invasive non-native plant species (as listed on Schedule 9 of WCA) are present, this criterion is automatically failed.	Pass – Creeping buttercup was present but accounted for less than 5% of the total area.
F	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 3 and 5 cannot contribute towards this count). Note - this criterion is essential for achieving Good condition for non-acid grassland types only.	Fail – A maximum of six species were present per m ² . Species recorded include: creeping bent,
Condition Assessment Outcome – Non-Acid Grassland		
Passes 5 or 6 criteria, including essential criterion A and additional criterion F.		Poor
Passes 3 - 5 criteria, including essential criterion A.		
Passes 2 or fewer criteria; OR Passes 3 or 4 criteria excluding criterion A and F.		



UKHabs Classification:		Individual trees: Urban trees	
Condition Sheet:		Individual trees Habitat Type	
Survey Date and Surveyor:		13/08/2026 – Greg Nightingale	
Condition Assessment Criteria		T1 DBH: Unknown Size: Assumed	
A	The tree is a native species (or at least 70% within the block are native species).	Pass - Ash	
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).		
C	The tree is mature (or more than 50% within the block are mature).	Pass – Automatic pass	
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.	Pass – Appears mature	
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy, or loose bark.	Pass – No damage is evidence and tree appears healthy	
F	More than 20% of the tree canopy area is oversailing vegetation beneath.	Fail	
Pass – Other neutral grassland below			
Criteria Assessment Outcome			
Passes 5 or 6 criteria.		Good	Good
Passes 3 or 4 criteria.		Moderate	
Passes 2 or fewer criteria.		Poor	



UKHabs Classification:		Sparsely vegetated land: ruderal/ephemeral
Condition Sheet:		Urban
Survey Date and Surveyor:		01/04/2025 – Jenn Senft and Lorna Roberts
Condition Assessment Criteria		
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.	Fail – Vegetation structure was uniform.
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.	Pass – Varied species composition.
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. Note - to achieve Good condition, this criterion must be satisfied by a complete absence of invasive non-native species (rather than <5% cover).	Pass – There were no invasive non-native species present.
Condition Assessment Outcome		
Passes all 3 core criteria; AND Meets the requirements for Good condition within criterion C. 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. Passes 0 or 1 of 3 core criteria.		Good
		Moderate
		Poor
		Moderate

