

Technical Note

Project:	Land at Gate Farm, Sutton Benger
Title:	Biodiversity Net Gain update
Date:	11 September 2026
Client:	Gleeson Land
Reference:	260911_P1456_Sutton Benger_BNG update
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1 Introduction and approach

- 1.1 This Technical Note has been prepared by EAD Ecology on behalf of Gleeson Land in relation to an Outline Planning Application for residential development at Gate Farm, Sutton Benger, hereafter referenced as the 'Site'; refer to Figure 1.
- 1.2 An Ecological Impact Assessment (EclA) Report (EAD Ecology, 2025) was previously submitted with the Outline Planning Application, which included a Biodiversity Net Gain (BNG) assessment. Due to changes to the Illustrative Layout arising from comments made by Wiltshire Council, an updated BNG Assessment has been prepared to quantify the estimated net change in biodiversity resulting from the revised proposals. The BNG Assessment is detailed in this Technical Note and supersedes that included in the EclA Report.
- 1.3 The Assessment has used the Defra Statutory Biodiversity Metric Calculation Tool (Defra, 2025a), with reference to supporting documents and the Biodiversity Metric principles (Defra, 2026 and 2025b). The completed Metric has been submitted as a digital (Excel) spreadsheet; this should be read in conjunction with this Technical Note.

2 Methodology

Pre-development habitats

- 2.1 The on-Site habitat and hedgerow baseline was informed by a Habitat Condition Assessment (HCA) survey undertaken by experienced botanists (Field Identification Skills Certificate (FISC) Level 4 / 5) from EAD Ecology on 19 June 2025 (majority of Site) and 10 December 2025 (B4069 verge only).

Habitat area measurements

- 2.2 Measurements of both pre-development and post-development habitats were undertaken with QGIS using the Biodiversity Metric QGIS Import Tool, then incorporated into the Metric using the Defra Statutory Metric GIS Import Tool (Natural England, 2023). Areas for individual trees were calculated in accordance with guidance (Defra, 2026), using the integrated Statutory Metric Tree Helper.

On-Site post-development habitats

- 2.3 Post-development on-Site habitat areas are based on the revised Illustrative Landscape Mitigation and Enhancement Plan (Tyler Grange, drawing no. 17958/P08b); refer to Figure 1. This represents

the outcome of an iterative process to maximise on-Site biodiversity value in accordance with the ecological hierarchy, the biodiversity gain hierarchy and the Statutory Biodiversity Metric User Guide (Defra, 2026), considering all other layout constraints; refer to Table 1.

Table 1: Application of biodiversity gain hierarchy

Biodiversity gain hierarchy	Scheme response
First, in relation to on-Site habitats which have a Medium, High and Very High distinctiveness (a score of four or more according to the statutory biodiversity metric), the avoidance of adverse effects from the development and, if they cannot be avoided, the mitigation of those effects.	Medium distinctiveness habitats were retained within the design of the scheme (no High or Very High distinctiveness habitats were present). Habitat loss was limited to habitats of Low distinctiveness (modified grassland and species poor hedgerows). New Medium distinctiveness habitats were proposed as shown in the Illustrative Landscape Mitigation and Enhancement Plan.
Second, in relation to all on-Site habitats which are adversely affected by the development, the adverse effect should be compensated by prioritising in order, where possible, the enhancement of existing on-Site habitats, creation of new on-Site habitats, allocation of registered off-Site gains and finally the purchase of biodiversity credits.	Creation of new on-Site habitats was proposed where existing habitats were being lost or retained habitats were not considered appropriate for enhancement. These options were maximised within the Site boundary.

- 2.4 Determination of expected post-development on-Site habitat conditions are based on the relevant habitat condition criteria in the Statutory Biodiversity Metric (Defra, 2025b). In the professional opinion of EAD Ecology, all proposed measures and targeted habitat conditions are considered realistic and achievable and assume the implementation of a Biodiversity Gain Plan, including a Habitat Management and Monitoring Plan (HMMP) detailing the establishment requirements for habitats and long-term management of retained, enhanced and created habitats. The HMMP would be produced in accordance with the Natural England Habitat Management and Monitoring Plan Template (JP058) and companion document.

Strategic significance

- 2.5 The strategic significance of both baseline and post-construction habitats applied to the Metric has been assigned in accordance with the Statutory Biodiversity Metric Guidance (Defra, 2026), with reference to Site-specific information. The Site is within an area covered by a Local Nature Recovery Strategy (LNRS; Wiltshire and Swindon LNRS); the strategic significance has been assigned with reference to this in accordance with the Statutory Biodiversity Metric Guidance (Defra, 2026).
- 2.6 The proposed habitat creation measures would not directly contribute to the priority habitat actions identified for this location in the Wiltshire and Swindon LNRS, and therefore strategic significance was assessed as Low for habitats and hedgerows.

Assumptions and limitations

- 2.7 The following assumptions and limitations were identified in this BNG assessment:

- The post-development habitats were mapped in accordance with the revised Illustrative Landscape Mitigation and Enhancement Plan (Figure 1) and the percentage habitat cover was extracted from details within this.
- The B4069 roadside verge was surveyed in December 2025, which is outside the optimal habitat survey period. However, sufficient information was obtained to determine grassland condition for the purpose of this assessment.
- All proposed hedgerows would be species-rich in accordance with the UK Habitat Classification (UKHab) criteria (v2.0, 2023).
- Appropriate Site tests, such as soil analyses, would be required to inform and confirm the feasibility of proposed habitat creation/enhancement measures for the BNG Plan condition.

3 Results

- 3.1 The pre-development biodiversity value of the Site is 20.23 Habitat Units and 2.48 Hedgerow Units; refer to Table 2 and Figure 2. Due to a minor change to the site boundary, this represents a slight change to the baseline set out in the EclA Report. No destructive or degrading activities have taken place, which would impact the biodiversity baseline assessment (other than standard agricultural operations) and no irreplaceable habitat occurs on or immediately adjacent to the land to which the application relates; this remains unchanged from the EclA Report.
- 3.2 The post-development biodiversity value of the Site, based on Figure 1, would be 11.78 Habitat Units and 4.24 Hedgerow Units; refer to Table 2 and Figure 3. The proposed development would, therefore, result in a net loss of -8.45 Habitat Units (-41.76%) and a net gain of +1.75 Hedgerow Units (+70.64%).
- 3.3 The conditions of the baseline habitats and hedgerows located within the Site are provided in Tables 3 - 5. The indicative post-construction conditions of habitats and hedgerows are provided in Table 6.

Table 2: Biodiversity Metric Summary

On-Site baseline pre-development	Habitat units	20.23
	Hedgerow units	2.48
On-Site post-development (Habitat retention, creation & enhancement)	Habitat units	11.78
	Hedgerow units	4.24
On-Site net % change (Habitat retention, creation & enhancement)	Habitat units	- 41.76%
	Hedgerow units	+ 70.64%
Total net unit change (Habitat retention, creation & enhancement)	Habitat units	- 8.45
	Hedgerow units	+ 1.75

Trading rules

- 3.4 Where the above on-Site habitat delivery is applied, all 'trading rule' requirements specified in the Statutory Metric would be met for Hedgerow Units. Post-development delivery of Habitat Units indicates a net loss and does not meet 'trading rules' for this component of the Metric; this would be satisfied through off-Site biodiversity offsetting.

Additionality

- 3.5 In accordance with current guidance, mitigation or compensation for impacts to Special Areas of Conservation (SAC) / Special Protection Areas (SPA) / European Protected Species (EPS) / further

listed schemes¹ (FLS) can be used 'in part' towards achieving BNG. This means that at least 10% of the development's biodiversity units must be related to habitat proposals not providing SAC/SPA/EPS/FLS mitigation/compensation (i.e. SAC mitigation/compensation can contribute up to the point of no net loss). No mitigation/compensation for SAC/SPA/EPS/FLS is proposed in this development; therefore, there are no additionality matters to address.

Irreplaceable habitats

- 3.6 No irreplaceable habitats have been identified within or adjacent to the Site. An area of ancient woodland lies approximately 40m north of the Site; appropriate measures were included in the EclA to avoid/mitigate potential impacts to this woodland.

4 Biodiversity Net Gain Strategy

On-Site habitat delivery

- 4.1 The future Biodiversity Gain Plan and HMMP would set out the on-Site habitat protection, enhancement, establishment and management strategies together with a framework for monitoring to provide certainty for the achievement of long-term maintenance of the predicted units for on-Site post-intervention habitats.
- 4.2 The HMMP will include detailed habitat establishment methods and programme, proposed management activities, which can be implemented for a 30-year period and a detailed work programme to ensure successful establishment/restoration of habitat, together with details of monitoring to evaluate the success of ongoing management activities and provide regular condition reporting to Wiltshire Council. The extent and frequency of monitoring reporting will be agreed with Wiltshire Council.

Off-Site habitat delivery

- 4.3 To ensure that statutory 10% BNG is achieved for the proposed development, the following habitat compensation and enhancement measures could be included in the biodiversity offsetting strategy:
- Delivery of Habitat Units outside of the Site boundary through creation of a Habitat Bank.
 - Purchase of Habitat Units for an existing Habitat Bank.
 - Purchase of Statutory Credits from the government; this is considered as a last resort.
- 4.4 The precise offsetting route would be set out in the Biodiversity Gain Plan.

5 Conclusion

- 5.1 The revised BNG assessment, based on the Illustrative Landscape Mitigation and Enhancement Plan (Figure 1), demonstrates that the proposed development is predicted to result in a net loss of -8.45 Habitat Units (-41.76%) and a net gain of 1.75 Hedgerow Units (+70.64%). Off-site habitat compensation and enhancement is required (biodiversity offsetting); an additional 10.47 Habitat Units would be required to achieve the statutory 10% BNG, subject to satisfying the applicable trading rules. This updates the information set out in the Biodiversity Statement in the EclA Report (EAD Ecology, 2025).

¹ <https://www.gov.uk/guidance/what-you-can-count-towards-a-developments-biodiversity-net-gain-bng>

- 5.2 The revised BNG assessment remains similar to that undertaken previously and set out in the EclA Report. Accordingly, there are no changes to the conclusions of the EclA.
- 5.3 A further BNG assessment based on detailed development/landscape plans, along with confirmation of the proposed biodiversity offsetting approach, would be set out in the future Biodiversity Gain Plan and HMMP, submitted to discharge the Statutory BNG Condition.

6 References

Defra (2025a) The Statutory Biodiversity Metric - Auditing and accounting for biodiversity calculation tool. July 2025.

Defra (2025b) The Statutory Biodiversity Metric – Technical Annex 1: Condition Assessment Sheets and Methodology. January 2025.

Defra (2026) The Statutory Biodiversity Metric User Guide. Updated June 2026.

EAD Ecology (2025) Ecological Impact Assessment: Land at Gate Farm, High Street, Sutton Benger. Report for Gleeson Land, December 2025.

Natural England (2023) Biodiversity Metric GIS Import Tool. ISBN: 978-1-7393362-5-7. November 2023.

[Wiltshire and Swindon Local Nature Recovery Strategy - Wiltshire Council](#)

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

Figure 1: Illustrative Landscape Mitigation and Enhancement Plan



Figure 2: BNG Assessment – Baseline Plan

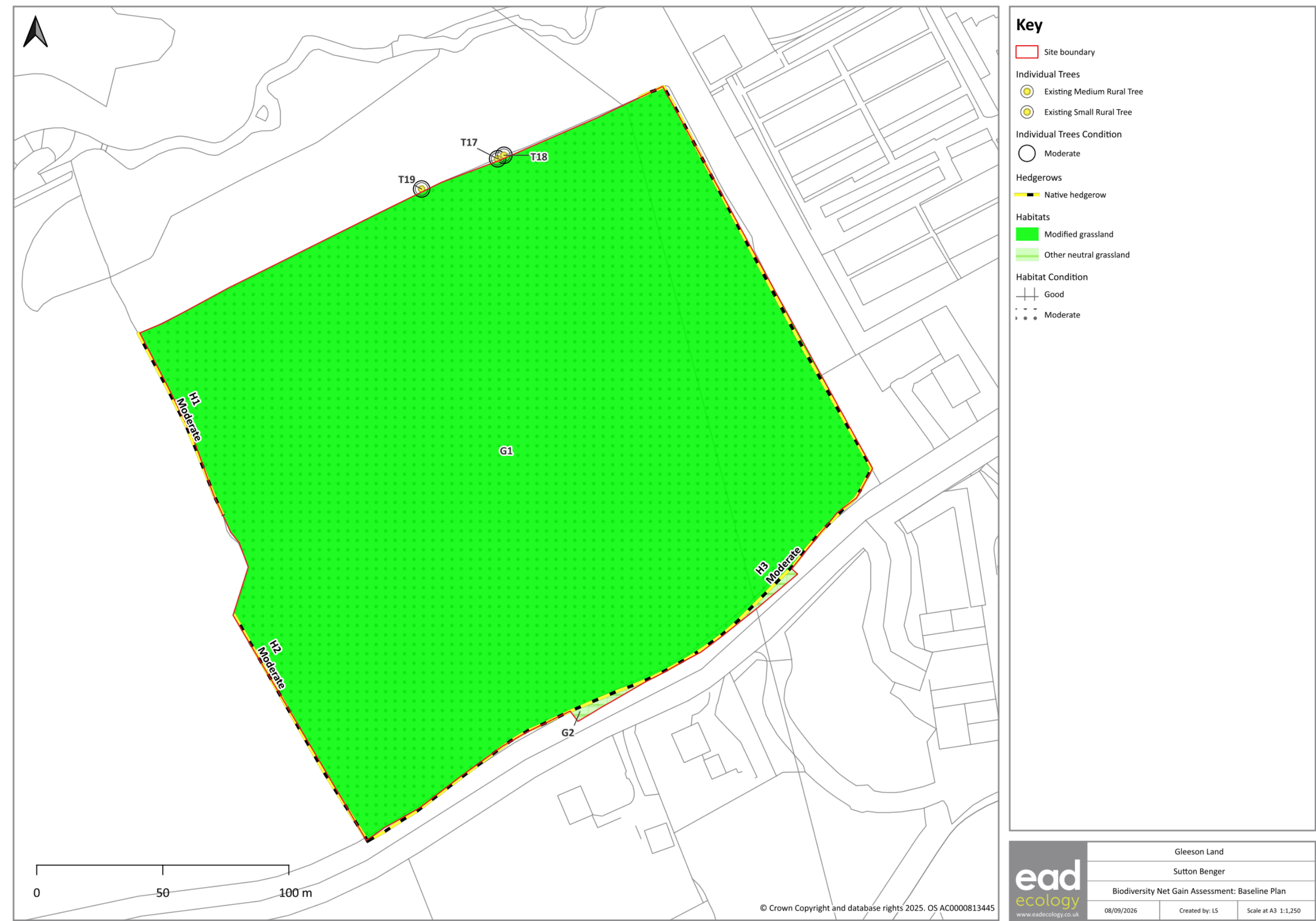


Figure 3: BNG Assessment – Post-Intervention Plan



Table 3: Baseline Habitat Condition Assessment Results

Habitat ref	Habitat	Condition assessment criteria, including grassland quadrat (Q) data (P = Pass, F = Fail)	Condition
G1	Modified grassland	A – P, B – F, C – P, D – P, E – F, F – P, G – P Q1 – Perennial rye-grass, Yorkshire fog, sweet vernal grass, cock's-foot, rough meadow grass, creeping bent Q2 – Perennial rye-grass, Yorkshire fog, creeping bent, crested dog's-tail, field bindweed, common mouse-ear, sweet vernal grass, cock's-foot, creeping buttercup Q3 – Yorkshire fog, sweet vernal grass, meadow foxtail, creeping bent, cock's-foot, perennial rye-grass, dandelion, bulbous buttercup Q4 – Cock's-foot, perennial rye-grass, Yorkshire fog, rough meadow grass, bulbous buttercup, common mouse-ear Q5 – Perennial rye-grass, cock's-foot, meadow foxtail, Yorkshire fog, field bindweed, soft brome, creeping bent, red fescue, common mouse-ear Q6 – Perennial rye-grass, Yorkshire fog, bulbous buttercup, common mouse-ear, sweet vernal grass, red fescue, rough meadow grass, meadow foxtail	Moderate
G2	Other neutral grassland	A – P, B – P, C – F, D – P, E – P, F – P Q2 – Dove's-foot crane's-bill, yarrow, hedge bedstraw, common vetch, hogweed, cock's-foot, hairy bittercress, false oat grass, common nettle Q3 – common vetch, yarrow, false oat grass, hedge woundwort, dandelion, dove's-foot crane's-bill, lesser celandine, common field speedwell, thistle species Q4 – cleavers, common nettle, false oat grass, hedgerow crane's-bill, groundsel, field speedwell, perforated St John's-wort, burnet saxifrage, oxeye daisy, yarrow, common nettle, curled dock, common knapweed	Good

Table 4: Baseline Tree Condition Assessment Results

Tree ref	BNG Condition Criteria (Parks et al 2023) P= Pass, F = Fail						Size	Condition
	A	B	C	D	E	F		
T17	P	P	F	P	F	P	Medium	Moderate
T18	P	P	F	P	F	P	Small	Moderate
T19	P	P	F	P	F	P	Small	Moderate

Table 5: Baseline Hedgerow Condition Assessment Results

Hedge ref	Hedgerow Type	BNG Condition Criteria P= Pass, F = Fail										Condition
		A1	A2	B1	B2	C1	C2	D1	D2	E1	E2	
H1	Native hedgerow	P	P	F	P	P	P	P	F	N/A	N/A	Moderate
H2	Native hedgerow	P	P	F	F	P	F	P	F	N/A	N/A	Moderate
H3	Native hedgerow	F	P	F	F	P	P	P	F	N/A	N/A	Moderate

Table 6: Post-Construction Management and Interventions

Habitat	Predicted condition	Justification
Modified grassland	Poor	Precautionary assessment – areas of amenity grassland are unlikely to have a species richness of 6-8 species per m ² . Therefore, 'Poor' condition assumed.
Other neutral grassland	Moderate	Proposed management of wildflower grassland will ensure development of a diverse, species-rich sward, meeting the following condition criteria as a minimum, i.e.: A – The appearance and composition of the vegetation closely matches characteristics of the specific grassland habitat type. Wildflowers, sedges and indicator species for the specific grassland habitat type are very clearly and easily visible throughout the sward. B – Sward height is varied. D – Cover of bracken <20% and cover of scrub <5%.
Sustainable drainage system	Moderate	Proposed management of the attenuation feature along the eastern boundary would result in the following condition criteria being met: 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. C - Invasive non-native plant species (i.e. listed on Schedule 9 of the Wildlife and Countryside Act 1981) and others which are to the detriment of native wildlife cover less than 5% of the total vegetated area. E1 - Plant species are mostly native. If non-native species are present, they should not be detrimental to the habitat or native wildlife.
Ponds (non-priority habitat)	Poor	Proposed management of the two attenuation basins would result in the following condition criteria being met: C – Less than 10% of the water surface is covered with duckweed <i>Lemna</i> spp. or filamentous algae. F – There is an absence of listed non-native plant and animal species. G – Pond is not artificially stocked with fish. If the pond naturally contains fish, it is a native fish assemblage at low densities. I – Pond surface is no more than 50% shaded by adjacent trees and scrub.
Urban trees	Moderate	Once established, urban trees are expected to pass condition criteria A, B, D and F as a minimum.
Species-rich native hedgerow	Moderate	Once established, proposed management will ensure new hedgerows are likely to meet the following condition criteria; i.e.: A1 – average height >1.5m. A2 – average width >1.5m. B1 – no gaps of >0.5m beneath canopy for majority of hedge. B2 – gaps make up less than 10% of hedge length with no gaps >5m. C2 – nettles, docks and cleavers present in <20% hedge length. D1 – invasive/introduced species make up <10% hedge length.