



**Padel Court at
Basset Down Golf
Complex
Hay Lane
Swindon
SN4 9QW**

**Biodiversity Statement and
Draft Biodiversity Gain Plan**

Luscinia Ecology

On behalf of

Padel4All Limited



Document Properties

Reference	Revision	Date	Author	Reviewer
LUS25134 BS&BGP	Submission	10/12/2025	Mel Granato	Greg Nightingale
LUS25134 BS&BGP	Submission A	17/12/2025	Mel Granato	Greg Nightingale



Contents

Chapter 1: Biodiversity Statement	1
Chapter 2: Summary	2
Chapter 3: Introduction	3
Chapter 4: Method	7
Chapter 5: Baseline and Proposed Development	14
Chapter 6: Results and Summary	17
Appendix A: Condition Assessment Tables	i
Appendix B: Defra BGP Form	ii



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: 0.58 Hedgerow: 0.00 Watercourse: 0.00
Please provide the date the onsite pre-development biodiversity value was calculated.	Date of application 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)'.	LUS25134 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 the Padel Court at Basset Down Golf Complex, Hay Lane, Swindon, SN4 9QW.
- 2.2 Current Biodiversity Net Gain policy requirements relating to development in the Wiltshire 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 distinctiveness.
- 2.5 Proposed Development will achieve a Biodiversity Net Gain within the Site via the delivery of +0.12 habitat units (+21.46%) with the Trading Rules met.
- 2.6 Therefore, the Proposed Development will meet current policy requirements in relation to Biodiversity Net Gain.
- 2.7 This assessment has been undertaken using illustrative 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 This assessment accounts for the loss of ecological features (trees and woodland), which were planning commitments of a separate scheme, which should have been present at the time of the ecological survey. This is not considered degradation 'per se'.
- 2.9 The applicant is aware of, and has committed to, all the mitigation, compensation, and enhancement measures set out within this report.
- 2.10 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 19/12/2026).



Chapter 3: Introduction

Planning Context

3.1 This report sets out a Biodiversity Statement and Draft Biodiversity Gain Plan in relation to Padel Court at Basset Down Golf Complex, Hay Lane, Swindon, SN4 9QW (referred to as ‘the Site’ throughout this report). This report is supported by a site visit undertaken on 19/06/2025 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:

“Planning policies and decisions should contribute to and enhance the natural and local environment by:

...

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;”

3.4 And:

“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.”

3.5 The emerging Wiltshire Local Plan Pre-Submission Draft 2020-2038 (Regulations 19), policy 89 Biodiversity net gain states:

“Development must achieve a minimum of 20% biodiversity net gain, or higher as stipulated in national legislation and/or policy or supplementary guidance, over the pre-development biodiversity value as measured by the latest Biodiversity Metric. Exempted development⁵⁸ must achieve no net loss of biodiversity and should achieve appropriate net gains, aspiring to deliver at least 20% biodiversity net gain”.

¹ Luscinia Ecology (2025). *Padel Court at Basset Down Golf Complex, Hay Lane, Swindon, SN4 9QW: Preliminary Ecological Appraisal: LUS25134 PEA Submission*. Luscinia Ecology, Bristol.

² MHCLG (2025). National Planning Policy Framework. February 2025. Ministry of Housing, Communities and Local Government, London.



- 3.6 The Wiltshire Local Plan Pre-Submission Draft 2020-2038 (Regulations 19) is not adopted. The Proposed Development has targeted BNG outcome of at least 10% in accordance with Environment Act.

Site Description

- 3.7 The Site consists of an area of grassland, carparking and an existing padel. The Site is approximately 0.39 ha in size and located at National Grid Reference: SU 11182 80823. The Site is accessed from Hay Lane to the east. The Site is immediately surrounded by existing areas of managed grassland in active use as a golf course, commercial development, residential development, and a canal (**Figure 1**). 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 erection of two padel courts and associated parking*” (referred to as ‘the Proposed Development’ throughout this report). The Proposed Development will be accessed from Hay Lane to the east. The Proposed Development will result in the removal of the habitats within the Site and placement with buildings, hardstanding, individual trees and woodland. **Figure 2** shows the Proposed Development.

³ Image used under licence (©2024 Google): Accessed: 25/11/2025.



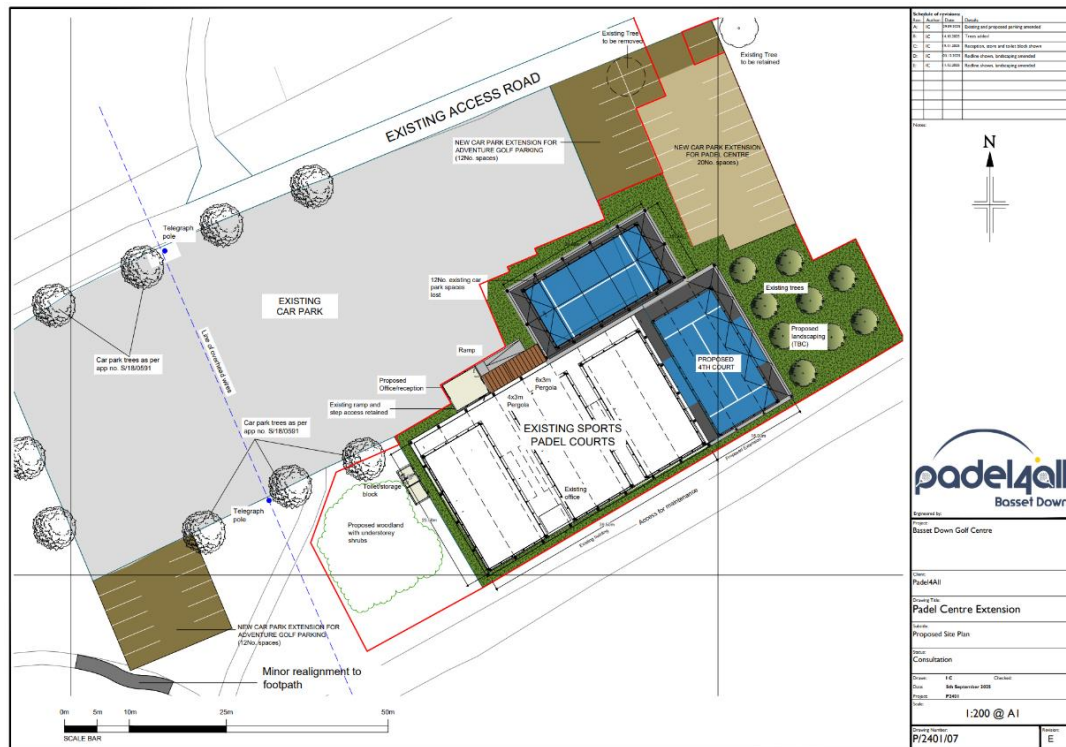


Figure 2. The Proposed Development

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 Draft 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 the required 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 19/06/2025. 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 The site visit data and Extended UK Classification Plan were compared to Proposed Plans from approved planning application 21/00546/FUL (**Figure 3**), and an On-Site Baseline Map, was produced (**Figure 4**). **Figure 4** 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.



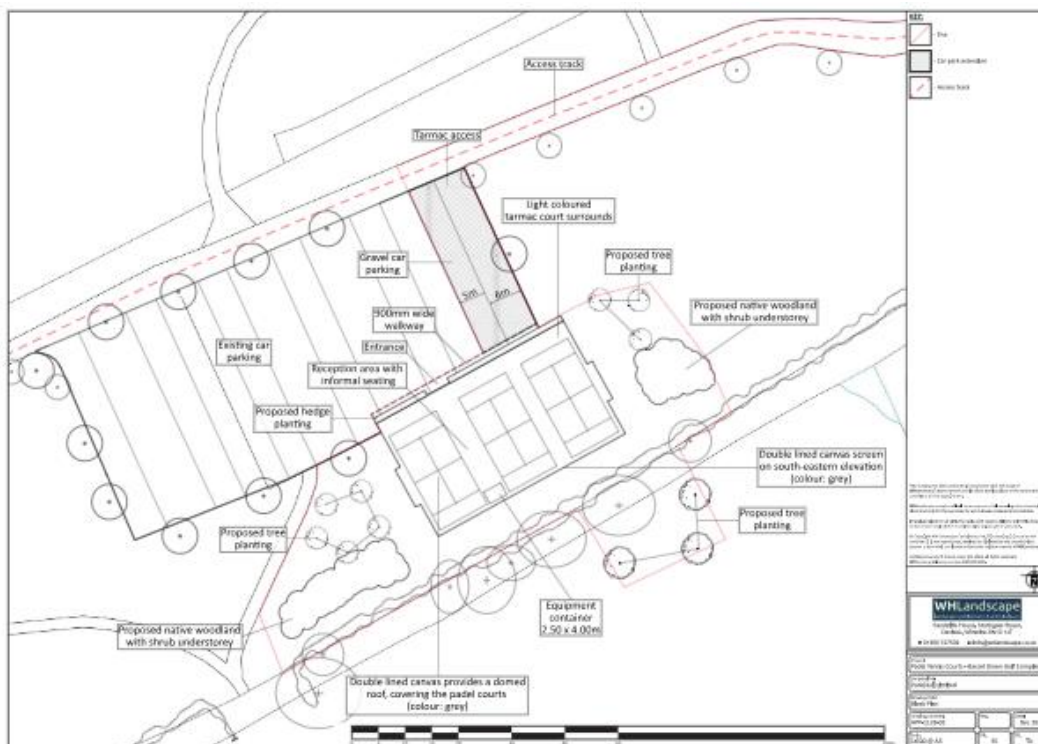


Figure 3. Proposed Development from application 21/00546/FUL



Figure 4. On-site Baseline Map

- 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 19/12/2026). 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 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 5**) was produced.

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.

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.



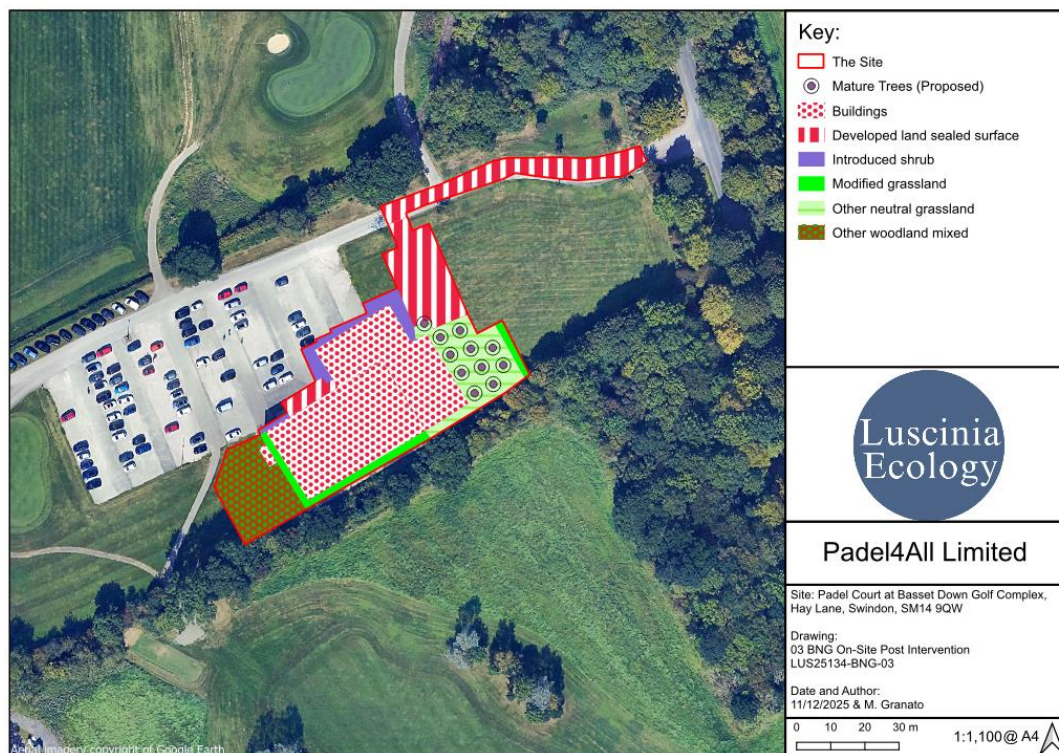


Figure 5. On-site Post Intervention Map

- 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 5**), along with the following additional methods:
- 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 responsible body for the Sites Local Nature Recovery Strategy (LNRS). The final Wiltshire and Swindon LNRS is now adopted and available for public viewing.



- 4.12 Table 7 of the statutory BNG guidelines method is being used to determine the strategic significance of this Site.
- 4.13 The Site is located in a strategically significant ecological area for Wider Countryside Measures, habitats include:
- The built environment
 - Nature friendly farming
 - Ponds
 - Green and blue access corridors
 - Hedgerows and dry-stone walls
 - Local landscape projects
- 4.14 These were unmapped measures. The strategic significance of the habitats within the Site were assessed as being **Low – Area/compensation not in local strategy/ no local strategy**.

Data Summary and Discussion

- 4.15 The Statutory Biodiversity Metric presents a detailed summaries of the resultant biodiversity unit change, separated by habitat type.
- 4.16 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.
- 4.17 The discussion also considers the wider context of the outline 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*

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

Limitations, Assumptions, and Clarifications

Limitations

4.19 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

4.20 None.

Clarifications

4.21 The baseline metric calculation has included proposed woodland and proposed tree planting from a previous application 21/00546/FUL which has not been yet been delivered.

4.22 The proposed planting from application 21/00546/FUL would have been small in stature and immature. The individual trees and other woodland; mixed have been assessed as being in poor condition given they would have recently been planted and were not subject to biodiversity net gain requirements previously.

Contributor Information

4.23 The Site visit and BNG Condition Assessments were completed by Greg Nightingale, the BNG Assessment, and BNG report were completed by 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 11 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.
Mel Granato BSc (Hons) MSc Qualifying member of CIEEM	Mel is a Consultant Ecologist with Luscinia Ecology, Graduated in 2023 in Conservation Ecology. Mel has two publications, one of which can be found in the Journal the Journal 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.

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:** Modified grassland
- **Individual trees:** Urban tree
- **Urban:** Artificial unvegetated; unsealed surface
- **Urban:** Developed land; sealed surface
- **Woodland:** Other mixed woodland

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**.

Proposed Development Assessment

5.4 The below is based on the On-site Post Intervention Map shown in **Figure 5**. 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 Modified grassland, other woodland; mixed, individual trees and developed land; sealed surface will be removed.

5.6 Developed land; sealed surface will be retained.



Habitats Enhanced

5.7 The Proposed Development will enhance the following:

- **Grassland:** Modified grassland

5.8 The modified grassland will be enhanced into other neutral grassland in moderate condition. This will be achieved by:

- Sward height will be varied by strimming edges and 'glades' within the grassland.
- Bracken *Pteridium aquilinum* will not be present and/or will be managed away.
- Bramble may be present at the southern grassland edge in low quantities.
- Species indicative of suboptimal condition and physical damage will be limited and/or managed away.
- Invasive non-native plant species will be controlled by management if they occur.
- The parcel will be seeded with a species mix with a consistently high characteristic indicator species for the habitat and management will encourage this outcome.

Habitats Created

5.9 The Proposed Development will provide the following:

- **Grassland:** Modified grassland
- **Individual trees:** Urban tree¹⁴
- **Urban:** Developed land; sealed surface
- **Urban:** Introduced shrub
- **Woodland and forest:** Other woodland; mixed¹⁴

5.10 Modified grassland, developed land; sealed surface and introduced shrub are not considered to be on-site significant enhancements. The remaining created habitats are considered to be on-site significant enhancements¹⁴.

Grassland: Modified grassland

5.11 Modified grassland will be provided within the Proposed Development. A 'moderate' condition can reasonably be achieved. Criteria relating to bare ground, bracken, species richness, and invasive species can reasonably be met.

Individual trees: Urban tree¹⁴

5.12 Tree planting is included within the Proposed Development in the east. A moderate condition for the trees located in sustainable locations can reasonably be achieved.

¹⁴ A legal agreement or planning condition is required.



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.

Urban: Introduced shrub

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

Woodland and forest; Other woodland; mixed^

5.15 Two areas of woodland will be created along the eastern and southern boundaries of the Site. These areas will be planted with native tree and shrub species and be managed into woodland. The areas connect from existing hedgerows along the southern boundary. Overtime, it is expected that a score of 24 on the condition assessment would be achieved within 30 years, which is classified as “poor”. The following outcomes are anticipated:

- One age-class present.
- No significant browsing damage evident in woodland.
- No invasive species present in woodland.
- Five or more native tree or shrub species found across woodland parcel.
- >80% of canopy trees and >80% of understory shrubs are native.
- 21 - 40% of woodland has areas of temporary open space.
- No classes or coppice regrowth present in woodland.
- Tree mortality 10% or less, no pests or diseases and no crown dieback.
- No recognisable woodland NVC plant community at ground layer present.
- One or less storey across all survey plots.
- No veteran trees present in woodland.
- Less than 25% of all survey plots within the woodland parcel have deadwood, such as standing and fallen deadwood, large dead branches and or stems, stubs and stumps, or an abundance of small cavities.
- 1 hectare or more of nutrient enrichment, and or 20% or more of woodland area has damaged ground.



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 The headline results demonstrate a net gain of 0.12 habitat units (+21.46%) with the Trading Rules met (**Figure 5**). As there are no hedgerows or watercourse units in the baseline, there is no requirement to provide a net gain in these units.

FINAL RESULTS		
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	<i>Area habitat units</i>	0.12
	<i>Hedgerow units</i>	0.00
	<i>Watercourse units</i>	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	<i>Area habitat units</i>	21.46%
	<i>Hedgerow units</i>	0.00%
	<i>Watercourse units</i>	0.00%
Trading rules satisfied?	Yes ✓	

Figure 6. 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 site comprising poor-quality habitats.
 - **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:
 - Using the pre-existing track to the Site
 - Developing on a partially developed area
 - **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:



- Modified grassland will be enhanced to other neutral grassland
- **Creation** – Opportunities for habitat creation within the Site have been explored and realistic opportunities and interventions have been agreed:
 - Other woodland; mixed
 - Native Individual trees
 - Modified grassland
- **Offsetting** – This is not required as the above process has ensured that a BNG can be delivered within the Site.

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. Therefore, this assessment has been based upon illustrative landscape design. 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: Condition Assessment Tables

UKHabs Classification:		Grassland: Modified Grassland
Condition Sheet:		Modified Grassland (low distinctiveness)
Survey Date and Surveyor:		19/06/2025 – Greg Nightingale
Condition Assessment Criteria		
A	There are 6-8 vascular plant species per m ² present, including at least 2 forbs (these may include those listed in Footnote 1). Note - this criterion is essential for achieving Moderate or Good condition. Where the vascular plant species present are characteristic of medium, high or very high distinctiveness grassland, or there are 9 or more of these characteristic species per m ² (excluding those listed in Footnote 1), please review the full UKHab description to assess whether the grassland should instead be classified as a higher distinctiveness grassland. Where a grassland is classed as medium, high, or very high distinctiveness, please use the relevant condition sheet.	Fail
B	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed.	Fail
C	Any scrub present accounts for less than 20% of the total grassland area (Some scattered scrub such as bramble may be present). Note - patches of scrub with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.	Pass
D	Physical damage is evident in less than 5% of total grassland area. Examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities.	Pass
E	Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens).	Pass
F	Cover of bracken is less than 20%.	Pass
G	There is an absence of invasive non-native plant species (as listed on Schedule 9 of WCA)	Pass
Condition Assessment Outcome		
Passes 6 or 7 criteria including passing essential criterion A.		Poor
Passes 4 or 5 criteria including passing essential criterion A.		
Passes 3 or fewer criteria; OR Passes 4 - 6 criteria (excluding criterion A).		



Appendix B: Defra BGP Form



Biodiversity gain plan

Submit a biodiversity gain plan to show how your development will achieve biodiversity net gain.

When to use this form

A biodiversity gain plan shows how a development will achieve 10% biodiversity net gain (BNG). Submit this form to your local planning authority after they approve your planning application.

Unless your development is exempt, you cannot start the development until the LPA approves your biodiversity gain plan and biodiversity metric calculation tool.

1. Submission details

1.1 Date

For example, 3/11/2023

09/12/25

1.2 Planning application reference number

TBC

1.3 Local planning authority (LPA)

Wiltshire Council

1.4 Development site address

If the site does not have an address, enter the OS grid reference.

Padel Court at Basset Down Golf Complex, Hay Lane, Swindon, SN4 9QW

1.5 Describe the development

Tell us about the proposed development and any changes of use (250 words).



2. Developer details

2.1 Applicant name

2.2 Company name

2.3 Address

2.4 Email address

2.5 Telephone number

2.6 Declaration

By signing this declaration, you confirm that the information you give is complete and correct. Any opinions are your genuine opinions.

2.7 Signature

2.8 Date

3. Responsible person details

Tell us about who is responsible for completing the biodiversity gain plan. For example, a consultancy ecologist or planning agent.

3.1 Name

3.2 Company name



3.3 Address

Luscinia Ecology Ltd, Hartham Park, Corsham,
Wiltshire, SN13 0RP

3.4 Email address

Hello@luscinia-ecology.co.uk

3.5 Telephone number

3.6 Declaration

By signing this declaration, you confirm that the information you give is complete and correct. Any opinions are your genuine opinions.

3.7 Signature

3.8 Date

4. Biodiversity net gain strategy

4.1 Is the relevant date for the pre-development biodiversity value the same date as the planning application?

☒ Yes

☐ No

4.2 If no, what earlier date did you agree with the LPA?

N/A

4.3 How have you met the guidance on 'what counts towards your BNG'?

[Find out what you can count towards a development's BNG](#)

Within the Site. The enhancement of grassland. The creation of other woodland; mixed, native individual trees, and modified grassland

4.4 How will you avoid or minimise impacts to habitats?

Tell us about the steps you've taken on site, including to avoid or minimise the impact on irreplaceable habitats.



Avoidance: The Proposed Development will use the pre-existing road to the Site and Develop on a partially developed area. The Proposed Development will not impact any habitats of very high or high distinctiveness. The Proposed Development will protect retained habitats and will minimise impacts on these habitats.

4.5 Did you use your local nature recovery strategy to inform the strategic significance of habitats?

This includes other specified strategies if you do not have a local nature recovery strategy.

☒ Yes

☐ No

4.6 How will you achieve the target net gain percentage?

☒ On-site

☐ Off-site

☐ Both

4.7 Are any of your on-site enhancements considered 'significant'?

☒ Yes

☐ No

4.8 If yes, tell us about the significant on-site enhancements

Include the appropriate planning condition or how you've secured the habitat.

As marked within this report ^.

4.9 How many off-site biodiversity units do you need to meet 10% net gain?

0.00

4.10 Explain why you're using off-site biodiversity units

Only answer this question if you're planning to use off-site biodiversity units (250 words).

n/a

4.11 Explain why you're planning to use statutory biodiversity credits

Only answer this question if you're planning to use statutory biodiversity credits (250 words).



n/a

4.12 Do you have a habitat management and monitoring plan?

☐ Yes

☒ No

4.13 Have you used the statutory biodiversity metric tool?

☒ Yes

☐ No

4.14 Biodiversity metric calculation

Send your biodiversity metric calculation to the LPA and enter the file name.

LUS25134 BS&BGP Submission A (excel)

4.15 Condition assessments

Send your condition assessments to the LPA and enter the file name.

LUS25134 BS&BGP Submission A(pdf)

4.16 Pre-development habitat survey report and map

Send your baseline habitat survey report and map to the LPA. Enter the file name.

LUS25134 BS&BGP Submission A (pdf)

4.17 Post-development habitat map or landscape plan

Send your post-development habitat survey report and map to the LPA. Enter the file name.

LUS25134 BS&BGP Submission A (pdf)

4.18 Have you included an approved habitat degradation in the baseline?

If yes, include the relevant consenting body and reference number.

☐ Yes

☒ No

Consenting body

n/a

Reference number

n/a



5. Irreplaceable habitats

5.1 Does the development impact any irreplaceable habitats?

If yes, tell us if you've submitted an approved compensation plan.

☐ Yes

☒ No

5.2 Have you submitted an approved compensation plan?

☐ Yes

☒ No

6. On-site habitat enhancements

Answer this section if your development includes on-site habitat enhancements.

6.1 Survey date

For example, 3/11/2023

19/06/25

6.2 Survey constraints

For example, access issues, weather, or seasonal constraints.

n/a

6.3 Total pre-development biodiversity value

Enter the number from the headline results in your statutory biodiversity metric calculation.

Number of area habitat biodiversity units

0.58

Number of hedgerow biodiversity units

0.00

Number of watercourse biodiversity units

0.00

6.4 Total post-development biodiversity value

Enter the number from the headline results in your statutory biodiversity metric calculation.

Number of area habitat biodiversity units



0.70

Number of hedgerow biodiversity units

0.00

Number of watercourse biodiversity units

0.00

6.5 Total net change in biodiversity units

Enter the number from the headline results in your statutory biodiversity metric calculation.

Area habitat biodiversity units

0.12

Area habitat biodiversity units % change

21.46

Hedgerow biodiversity units

0.00

Hedgerow biodiversity units % change

0.00

Watercourse biodiversity units

0.00

Watercourse biodiversity units % change

0.00

6.6 Will you register and allocate any biodiversity units from your site to other developments?

If yes or provisionally, give details.

☐ Yes

☒ No



6.7 Give details

Tell us about the amount of biodiversity units and the development location (250 words).

n/a

7. Off-site habitat enhancements

Answer this section if your development includes off-site habitat enhancements.

7.1 Tell us about the off-site habitat enhancements

Include whether you're delivering the off-site enhancements or buying biodiversity units.

n/a

7.2 Biodiversity gain site register reference number

n/a

7.3 How have you secured the off-site habitat enhancements?

Tell us about any responsible bodies and whether you've used an S106 or conservation covenant.

n/a

7.4 Total baseline biodiversity value

Enter the number from the headline results in your statutory biodiversity metric calculation.

Number of area habitat biodiversity units

n/a

Number of hedgerow biodiversity units

n/a

Number of watercourse biodiversity units

n/a

7.5 Total biodiversity value post-intervention

Enter the number from the headline results in your statutory biodiversity metric calculation.

Number of area habitat biodiversity units



n/a

Number of hedgerow biodiversity units

n/a

Number of watercourse biodiversity units

n/a

7.6 Total net change in biodiversity units

Enter the number from the headline results in your statutory biodiversity metric calculation.

Area habitat biodiversity units

n/a

Area habitat biodiversity units % change

n/a

Hedgerow biodiversity units

n/a

Hedgerow biodiversity units % change

n/a

Watercourse biodiversity units

n/a

Watercourse biodiversity units % change

n/a

8. Statutory biodiversity credits

Answer this section if you need to use statutory biodiversity credits.

8.1 Do you need to use statutory biodiversity credits?

☐ Yes



☒ No

8.2 How many statutory biodiversity credits do you need?

Tell us the unit shortfall by tier, including the spatial risk multiplier. Enter the number from the headline results in your statutory biodiversity metric calculation.

A1

n/a

A2

n/a

A3

n/a

A4

n/a

A5

n/a

H

n/a

W

n/a

8.3 What evidence is there that no units are available through the market?

Send a message from at least 3 habitat providers, or a search result from online registers.

n/a

8.4 Proof of purchase

Send proof of purchase and enter the reference number.

n/a



9. Trading summary

9.1 Distinctiveness group

Tell us if you met the BNG trading rules on habitat compensation for each distinctiveness group. If you did not meet the trading rules, tell us if you agreed bespoke habitat compensation.

Check the rules on habitat compensation in the [statutory biodiversity metric user guide](#).

Very high

Trading Rule met

High

Trading Rule met

Medium

Trading Rule met

Low

Trading Rule met

10. Sharing data (optional)

10.1 Can we share your ecological survey data with the Local Environmental Records Centre or other bodies?

☐ Yes

☒ No

