



**Bassett Down  
Complex  
Lower Salthrop  
Swindon  
Wiltshire  
SN4 9QW**

**Biodiversity Statement and  
Biodiversity Gain Plan**

**Luscinia Ecology**  
On behalf of  
**Sonder Sports I Limited.**



# Document Properties

| Reference       | Revision     | Date       | Author     | Reviewer       |
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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.                                                                                                                                                                                                                                                         | Habitat: 0.45                                                                    |
| Please provide the date the onsite pre-development biodiversity value was calculated.                                                                                                                                                                                                                                                                                | 02/09/2024                                                                       |
| If an earlier date, to the date of the planning application, has been used, please provide details why this date has been used.                                                                                                                                                                                                                                      | Date of submission                                                               |
| 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)'.                                                                                                           | LUS24112 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                                                                               |
| 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:<br>i. on land to which the application relates; and<br>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:                                                                                                                                                                                                                                                                                                             | Simon Chambers<br>LPC (Trull) Ltd Trull<br>Tetbury<br>Gloucestershire GL8<br>8SQ |
| 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 Adventure Golf Project, Basset Down Complex, Lower Salthrop, Swindon, Wiltshire SN4 9QW.
- 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, or medium distinctiveness.  
  
The proposed Development will achieve a Biodiversity Net Gain within the Site via 0.05 habitat units (11.42%), with the Trading Rules met. Therefore, the Proposed Development will meet current policy requirements in relation to Biodiversity Net Gain.
- 2.5 This assessment has been undertaken using illustrative design. The measures within this report should be secured by conditions for a Habitat Maintenance and Monitoring Plan and a Soft Landscape Plan.
- 2.6 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 06/07/2027).

## Chapter 3: Introduction

### Planning Context

3.1 This report sets out a Biodiversity Statement and Biodiversity Gain Plan in relation to Adventure Golf Project, Basset Down Complex, Lower Salthrop, Swindon, Wiltshire SN4 9QW (referred to as ‘the Site’ throughout this report). This report is supported by a site visit undertaken on 07/08/2024 and a Preliminary Ecological Appraisal<sup>1</sup>.

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)<sup>2</sup> 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 development<sup>58</sup> must achieve no net loss of biodiversity and should achieve appropriate net gains, aspiring to deliver at least 20% biodiversity net gain”.*

<sup>1</sup> Luscinia Ecology (2024). Adventure Golf Project, Basset Down Complex, Lower Salthrop, Swindon, Wiltshire SN4 9QW: Preliminary Ecological Appraisal: LUS24003 PEA Submission. Luscinia Ecology, Bristol.

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

- 3.6 As the Wiltshire Local Plan Pre-Submission Draft 2020-2038 (Regulations 19) is not yet fully adopted, the Proposed Development in accordance with Environment Act and NPPF, has a targeted BNG outcome of at least 10%.

## Site Description

- 3.7 The Site comprises an existing area of grassland (referred to as 'the Site' throughout this report). A native hedgerow with trees ran along the west to the south of the Site. The Site includes a hardstanding track which provides access from the north. The Site is approximately 0.25ha in size and located at National Grid Reference: SU 11071 80772. The Site is immediately surrounded by existing areas of managed grassland in active use as a golf course (**Figure 1**). The wider landscape is largely formed of farmland.

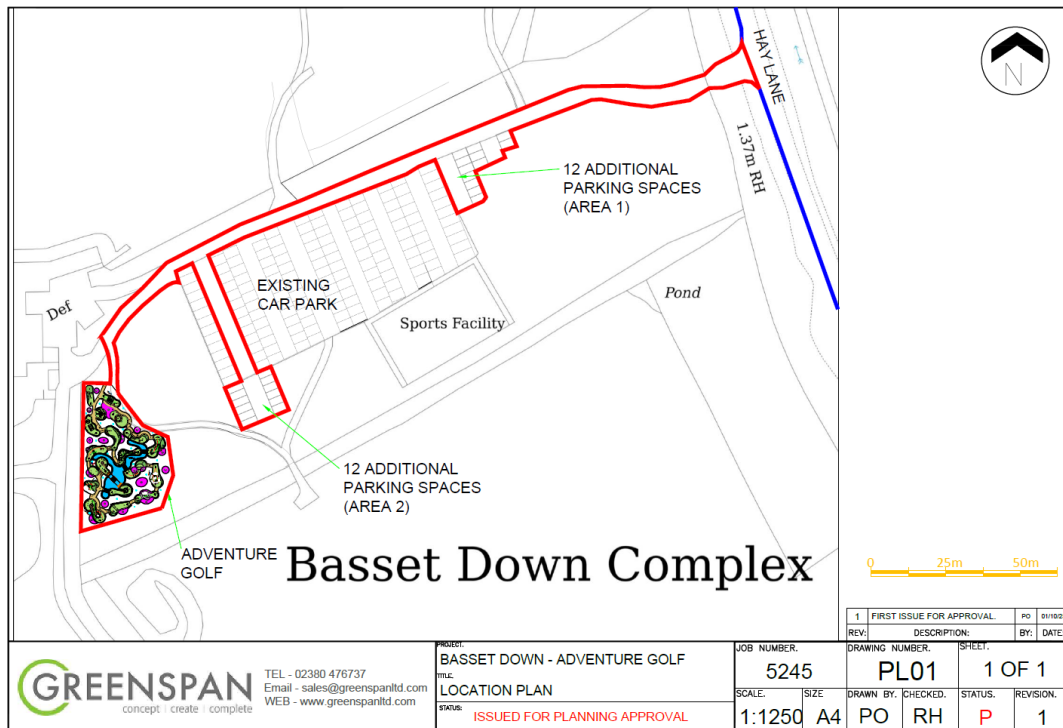


**Figure 1. Aerial image – Site boundary in red line<sup>3</sup>**

## Proposed Development

- 3.8 A planning application for the construction of an adventure golf facility with associated access and landscaping will be submitted soon (referred to as the 'Proposed Development' throughout this report). Access will be via a track, which leads to Basset Down Road to the East. The Proposed Development will result in the removal of the habitats within the Site and replacement with hardstanding. **Figure 2** shows the Proposed Development.

<sup>3</sup> Image used under licence (©2024 Google): Accessed: 02/04/2024.



**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 guidance<sup>4</sup> and in line with the Statutory Biodiversity Metric guideline<sup>5</sup>. **Appendix A** sets out how each of the BNG Good Practice Principles<sup>6</sup> 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 Survey<sup>7</sup> method on 07/08/2024. 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 sheets<sup>8</sup> 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.

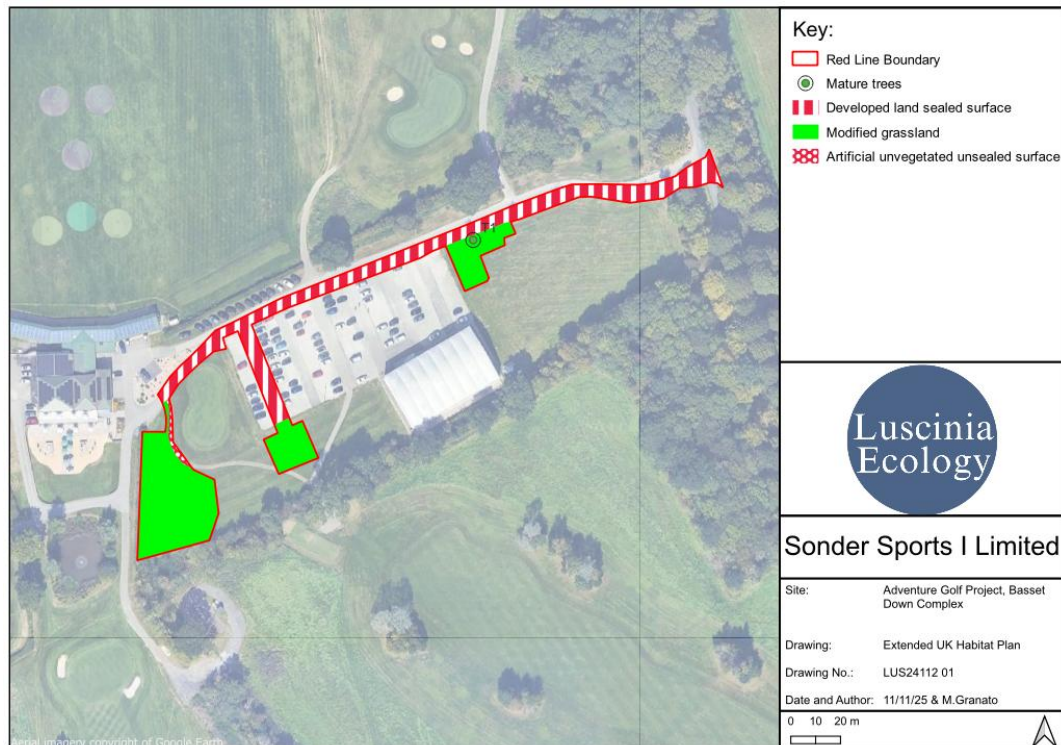
<sup>4</sup> Baker J., Hoskins R., and Butterworth T. (2019). *Biodiversity Net Gain. Good practice principles for development: A practical guide*. Ciria, London.

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

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

<sup>7</sup> UKHab Ltd (2023). *UK Habitat Classification Version 2.0*. UKHab Ltd, Stockport.

<sup>8</sup> 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 07/02/2026). This is reasoned in line with good practice guidelines<sup>9</sup>.

### **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 25m<sup>2</sup> rule was applied<sup>10</sup>.
  - The habitats were then assigned a pre-set distinctiveness grade<sup>11</sup>.
  - 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.

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

<sup>10</sup> Habitats occupying less than 25m<sup>2</sup> were absorbed and considered within the adjacent habitat(s).

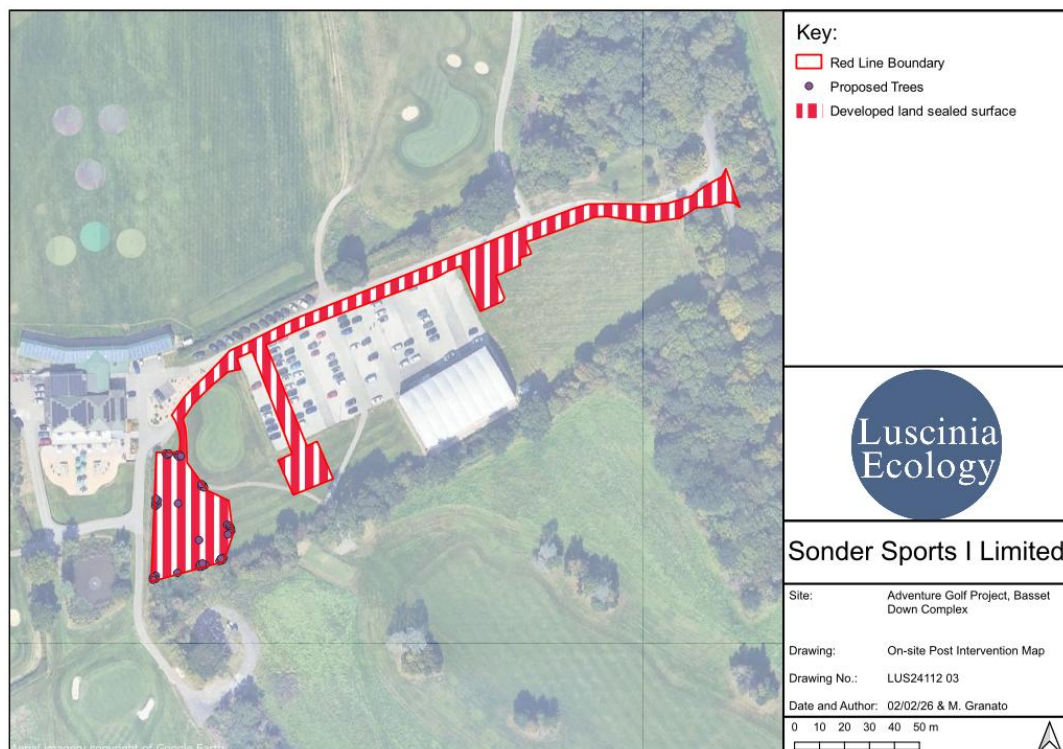
<sup>11</sup> Indicative of the inherent 'value' of the habitat.

- Where applicable, habitats were subject to a 'condition assessment'<sup>12</sup>.
- Habitats were subject to a strategic significance assessment<sup>13</sup>.

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 using the On-site Post Intervention Map (**Figure 4**), 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.

<sup>12</sup> 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.

<sup>13</sup> 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 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 are now fully adopted by the council 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 The strategic significance of the habitats within the Site were assessed as being '**Low**'.

### 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 Principles<sup>6</sup>, 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**

4.19 The survey was undertaken on a managed parcel of grassland. This limitation has been accounted for within the condition assessments of the habitats within the Site.

### **Contributor Information**

4.20 The Site visit, BNG Condition Assessments, BNG Assessment, and BNG report were completed by Mel Granato. The BNG report was reviewed by Greg Nightingale. **Table 1** outlines the relevant experience of the assessment contributors.

| Contributor                                                                     | Experience                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|---------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>Greg Nightingale</b><br/>BSc (Hons)<br/>MCIEEM</p>                        | <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> |
| <p><b>Mel Granato</b><br/>BSc (Hons)<br/>MSc<br/>Qualifying member of CIEEM</p> | <p>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.</p> <p>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.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

**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 tree:** Urban tree (T1)
- **Urban:** Artificial unvegetated, unsealed surface

5.3 The assessment of the character, extent, condition, historic management, and species composition of these habitats is outlined within the PEA<sup>1</sup> and the condition assessment tables within **Appendix B**.

5.4 Artificial unvegetated, unsealed surface does not require condition assessment.

## Proposed Development Assessment

5.5 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**

5.6 The modified grassland, a small individual tree (T1), and artificial unvegetated, unsealed surface will be removed.

## **Habitats Enhanced**

5.7 No habitats will be enhanced.

## Habitats Created

5.8 The Proposed Development will provide the following:

- **Urban:** Developed land; sealed surface
- **Individual trees:** Urban tree

5.9 The 'Developed land; sealed surface' is not considered to be On-site significant Enhancements. This habitat is not discussed further as it is of negligible importance and does not require a condition assessment.

### Individual trees: Urban tree

5.10 Tree planting of 38 native trees is included within the Proposed Development across the new landscaping and outside of private curtilages. 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

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

## 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 guidance<sup>6</sup> 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.
- 6.2 Following the avoidance tier of the mitigation hierarchy, the Proposed Development will not remove any irreplaceable habitats, or habitats of very high, high, or medium distinctiveness.
- 6.3 The headline results demonstrate a net gain of 0.05 habitat units (11.42%) and the Trading Rules have been met (**Figure 5**).

| FINAL RESULTS                                                                                                                       |                          |        |
|-------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------|
| <b>Total net unit change</b><br><small>(Including all on-site &amp; off-site habitat retention, creation &amp; enhancement)</small> | <i>Habitat units</i>     | 0.05   |
|                                                                                                                                     | <i>Hedgerow units</i>    | 0.00   |
|                                                                                                                                     | <i>Watercourse units</i> | 0.00   |
| <b>Total net % change</b><br><small>(Including all on-site &amp; off-site habitat retention, creation &amp; enhancement)</small>    | <i>Habitat units</i>     | 11.42% |
|                                                                                                                                     | <i>Hedgerow units</i>    | 0.00%  |
|                                                                                                                                     | <i>Watercourse units</i> | 0.00%  |
| <b>Trading rules satisfied?</b>                                                                                                     | Yes ✓                    |        |

**Figure 5. Headline results of The Statutory Biodiversity Metric**

### Biodiversity Gain Hierarchy

- 6.4 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 of a previously managed area, comprising poor-quality habitats and hardstanding.
  - **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 removal of regularly managed modified grassland
    - Utilizing the existing track and other developed land in the Site
  - **Mitigation** – The Proposed Development will protect retained habitats and will minimise impacts on these habitats<sup>1</sup>
  - **Enhancement** – Opportunities for habitat enhancement within the Site have been explored and realistic opportunities and interventions were not feasible.

- **Creation** – Opportunities for habitat creation within the Site have been explored and realistic opportunities and interventions have been agreed:
  - Planting of 38 small native trees
- **Offsetting** – This is not required as the above process has insured that a BNG can be delivered within the Site.

## Summary

- 6.5 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.
- 6.6 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<sup>^</sup>.
- 6.7 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.
- 6.8 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: Delivery of Good Practice Principles

| BNG Principle                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Application                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Principle 1. Apply the Mitigation Hierarchy</b><br><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>                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | The Proposed Development is located on a golf course. 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.                                                                                                                                                                                                                                     |
| <b>Principle 2. Avoid losing biodiversity that cannot be offset by gains elsewhere</b><br><i>Avoid impacts on irreplaceable biodiversity – these impacts cannot be offset to achieve No Net Loss or Net Gain.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | There will be no loss of irreplaceable habitats and the habitats lost are replaceable or were unnatural/modified in nature.                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Principle 3. Be inclusive and equitable</b><br><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>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Engagement with stakeholders, including local residents and the Local Planning Authority will be undertaken as part of the planning application.                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Principle 4. Address risks</b><br><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. |
| <b>Principle 5. Make a measurable Net Gain</b><br><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.                                                                                                                                                                                                                                                                       |
| <b>Principle 6. Achieve the best outcomes for biodiversity</b><br><i>Achieve the best outcomes for biodiversity by using robust, credible evidence and local knowledge to make clearly-justified choices when:</i> <ul style="list-style-type: none"> <li><i>Delivering compensation that is ecologically equivalent in type, amount and condition, and that accounts for the location and timing of biodiversity losses.</i></li> <li><i>Compensating for losses of one type of biodiversity by providing a different type that delivers greater benefits for nature conservation</i></li> <li><i>Achieving Net Gain locally to the development while also contributing towards nature conservation priorities at local, regional and national levels.</i></li> <li><i>Enhancing existing or creating new habitat.</i></li> <li><i>Enhancing ecological connectivity by creating more bigger, better and joined areas for biodiversity.</i></li> </ul> | 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.                                                                                                  |
| <b>Principle 7. Be additional</b><br><i>Achieve nature conservation outcomes that demonstrably exceed existing obligations (i.e. do not deliver something that would occur anyway).</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | The additionality principle has not been contravened.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Principle 8. Create a Net Gain legacy</b><br><i>Ensure Net Gain generates long-term benefits by:</i> <ul style="list-style-type: none"> <li><i>Engaging stakeholders and jointly agreeing practical solutions that secure Net Gain in perpetuity.</i></li> <li><i>Planning for adaptive management and securing dedicated funding for long-term management.</i></li> <li><i>Designing Net Gain for biodiversity to be resilient to external factors, especially climate change.</i></li> <li><i>Mitigating risks from other land uses.</i></li> <li><i>Avoiding displacing harmful activities from one location to another.</i></li> <li><i>Supporting local-level management of Net Gain activities.</i></li> </ul>                                                                                                                                                                                                                                 | Engagement with stakeholders, including local residents and the Local Planning Authority will be undertaken as part of the planning application.                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Principle 9. Optimise Sustainability</b><br><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:                                                       |                                                                                                                                                                                                                                                                                     | Grassland – Modified Grassland                                                    |
| Condition Sheet:                                                             |                                                                                                                                                                                                                                                                                     | Modified Grassland (low distinctiveness)                                          |
| Survey Date and Surveyor:                                                    |                                                                                                                                                                                                                                                                                     | 07/08/2024 – Mel Granato                                                          |
| Condition Assessment Criteria                                                |                                                                                                                                                                                                                                                                                     |                                                                                   |
| A                                                                            | There are 6-8 vascular plant species per m2 present, including at least 2<br><b>Note - this criterion is essential for achieving Moderate or Good condition.</b>                                                                                                                    | No – There were 4.6 species per m <sup>2</sup> over five quadrats <sup>14</sup> . |
| 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.                                                                     | No – tightly managed                                                              |
| C                                                                            | Any scrub present accounts for less than 20% of the total grassland area. (Some scattered scrub such as bramble <i>Rubus fruticosus agg.</i> may be present). Note - patches of scrub with continuous (more than 90%) cover should be classified as the relevant scrub habitat type | Yes – No scrub was present.                                                       |
| 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                              | Yes – No damage is evident                                                        |
| E                                                                            | Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens)                                                                                                                                                              | Yes – 1% cover                                                                    |
| F                                                                            | Cover of bracken <i>Pteridium aquilinum</i> is less than 20%                                                                                                                                                                                                                        | Yes                                                                               |
| G                                                                            | There is an absence of invasive non-native plant species (as listed on Schedule 9 of WCA4)                                                                                                                                                                                          | Yes                                                                               |
| 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) |                                                                                                                                                                                                                                                                                     |                                                                                   |

<sup>14</sup> Located at: TL0722904261, TL0713104251, TL0715804175, TL0727304235, and TL0719004207.

|                               |                                                                                                                                                                                                                                                                                        |                               |          |
|-------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|----------|
| UKHabs Classification:        |                                                                                                                                                                                                                                                                                        | Individual trees: Urban trees |          |
| Condition Sheet:              |                                                                                                                                                                                                                                                                                        | Individual trees Habitat Type |          |
| Survey Date and Surveyor:     |                                                                                                                                                                                                                                                                                        | 07/08/2024 – Mel Granato      |          |
| Condition Assessment Criteria |                                                                                                                                                                                                                                                                                        | T1: Cherry                    |          |
|                               |                                                                                                                                                                                                                                                                                        | DBH: 14                       |          |
|                               |                                                                                                                                                                                                                                                                                        | Size: Small                   |          |
| A                             | The tree is a native species (or at least 70% within the block are native species).                                                                                                                                                                                                    | Pass                          |          |
| 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).                                                                                        | Pass                          |          |
| C                             | The tree is mature (or more than 50% within the block are mature).                                                                                                                                                                                                                     | Fail                          |          |
| 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. | Fail                          |          |
| E                             | Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy, or loose bark.                                                                                                                                                   | Fail                          |          |
| F                             | More than 20% of the tree canopy area is oversailing vegetation beneath.                                                                                                                                                                                                               | Pass                          |          |
| Criteria Assessment Outcome   |                                                                                                                                                                                                                                                                                        |                               |          |
| Passes 5 or 6 criteria.       |                                                                                                                                                                                                                                                                                        | Good                          | Moderate |
| Passes 3 or 4 criteria.       |                                                                                                                                                                                                                                                                                        | Moderate                      |          |
| Passes 2 or fewer criteria.   |                                                                                                                                                                                                                                                                                        | Poor                          |          |