

## Council Planning Consultation Response

### ECOLOGY

|                        |                                                                                                                                                               |
|------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Officer name:</b>   | Patrick Olshansky                                                                                                                                             |
| <b>Date:</b>           | 02/03/2026 <del>24/03/2026</del> 13/04/2026                                                                                                                   |
| <b>Application No:</b> | PL/2026/00485                                                                                                                                                 |
| <b>Proposal:</b>       | Extension to create additional Padel Court facilities, including office/reception, new toilet and storage building, parking, landscaping and associated works |
| <b>Site Address:</b>   | BASSETT DOWN GOLF CLUB, BASSETT DOWN, SWINDON, SN4 9QP                                                                                                        |
| <b>Case Officer:</b>   | Audrey Lo                                                                                                                                                     |

### Recommendations:

|                                     |                                                |
|-------------------------------------|------------------------------------------------|
| <input type="checkbox"/>            | No Comment                                     |
| <input type="checkbox"/>            | Support                                        |
| <input type="checkbox"/>            | No objection                                   |
| <input type="checkbox"/>            | Condition (no objection subject to conditions) |
| <input checked="" type="checkbox"/> | Objection - further information required       |
| <input type="checkbox"/>            | Objection in principle                         |
| <input type="checkbox"/>            | HRA.                                           |

### Further Information Required:

|   | Issue                                                            | Policy/Legislative Compliance | Date information requested & Further information required | Satisfactorily addressed (Document & Date submitted) |
|---|------------------------------------------------------------------|-------------------------------|-----------------------------------------------------------|------------------------------------------------------|
| 1 | Discrepancies in Areas and Habitats recorded in Baseline Metric. | EA, TCPA                      | 26/02/2026 – Amended BNG Metric and BNG Report            | No<br><br>YES                                        |

The outstanding document(s) listed above are needed to enable the council's ecology team to consider all the relevant impacts and benefits of the proposed scheme. The council's ecologists will provide a further response once all the above information has been submitted via the case officer.

**Please Note:** When resubmitting a revised document, **ALL** changes must be highlighted to enable review.

Thank you for your consultation on the above application. I have reviewed the submitted documents against OS maps, aerial photographs of the site and surrounding area, together with GIS layers of statutory and non-statutory designated sites and existing records of protected species.

### Information considered:

- Biodiversity Statement and Draft Biodiversity Gain Plan (Luscinia Ecology, 17 Dec 2025)
- Preliminary Ecological Appraisal (Luscinia Ecology, 16 Dec 2025)
- Proposed Site Plan Rev. F (Padel4All, Sept 2025)
- Tree Survey, Arboricultural Impact Assessment & Tree Constraints Plan (WH Landscape Consultancy Ltd., Jan 2026)
- Proposed Elevations P2401 06 Rev A (Padel4All, Sept 2025)
- Location Plan P/2401/02 (Padel4All, Sept 2025)
- BNG Metric (Luscinia Ecology, 17 Dec 2025)

### COMMENTS:

### Non-Statutory Sites (LWS)

There are two woodlands to the north and south which are listed in the ancient woodland and priority habitat inventories. Based on the scale and nature of the development there will be no direct loss of woodland. Lighting on boundary habitats should not exceed current levels. A detailed lighting scheme will be secured by condition.

### **Compliance with CP50 (no net loss etc)**

A no net loss of boundary habitat can be achieved through the establishment of root protection areas (see Tree Constraints Plan ARB-1991-02 of Illustrative Material of Tree Survey, Arboricultural Impact Assessment & Tree Constraints Plan (WH Landscape Consultancy Ltd., Jan 2026). This plan should be included in the approved plans and any Reasonable Avoidance Measures (RAMs) statement secured by condition.

Compensation for the loss of grassland will be achieved through statutory BNG (see below).

Additional enhancement will be provided through the inclusion of an invertebrate box and a hibernaculum which have been included in the Proposed Site Plan Rev. F (Padel4all Basset Down, Sept 2025). This plan will be included in approved documents.

### **Protected Species**

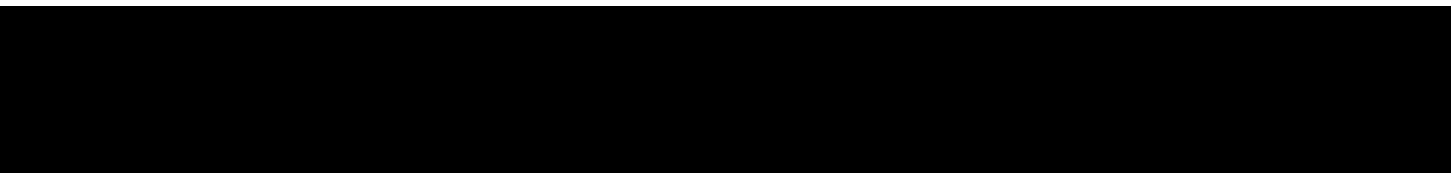
#### **GCN**

The Preliminary Ecological Appraisal (PEA) concludes that the habitats directly affected by the proposal comprise intensively managed modified grassland and an area of hardstanding only, both of which the consultant identifies as being of limited ecological value.

The PEA acknowledges that the wider golf course supports habitats that could be used by a range of species, including great crested newt (GCN). Whilst the consultant concludes that the on-site habitats themselves are of limited suitability for GCN, it is recognised that adjacent habitats, including hedgerow, have potential to support GCN during their terrestrial phase. A ditch was identified directly to the southeast to the site, but this was assessed as unsuitable for GCN by the consultant.

The PEA confirms that these adjacent habitats will not be directly impacted by the development, that surrounding habitat connectivity will be retained around the site, and that more suitable GCN habitat will be created on site as part of the proposals.

Based on these findings, the consultant concludes within the PEA that the implementation of Reasonable Avoidance Measures (RAMs) for amphibians onsite will be sufficient to avoid impacts. These measures are set out in Section 5 of the PEA. The RAMs detailed within Section 5 will be secured by condition.



#### **Bats**

The site is of moderate suitability for bat flight paths and foraging, with the grassland of low foraging value and suitable adjacent habitats retained outside the development boundary. Existing lighting from the current building, traffic and the floodlit driving range 50m northwest likely cause some disturbance, but lighting on boundary habitats should not exceed current levels. A detailed lighting scheme will be secured by condition.

### **Biodiversity Net Gain (BNG)**

Under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021), this development must deliver a minimum 10% Biodiversity Net Gain (BNG). A Biodiversity Gain Plan condition will apply if permission is granted.

A statutory biodiversity metric has been submitted; however, the following matters must be resolved prior to determination:

- The redline area is inconsistent across the application documents (0.38ha in the application form to 0.45ha when measured using GIS). Confirm the correct application boundary and update the metric (and associated plans as necessary) so that the redline area used in the BNG calculation matches the approved application boundary. Updated versions of the PEA, BNG Statement and Metric have been submitted. Site area is stated to be 0.38 ha in PEA and BNG Statement and 0.40 ha in the metric. A link to spatial files was sent via email on 02/04/2026.
- The baseline habitat areas in the metric appear inaccurate. The extent of modified grassland within the redline appears understated relative to artificial surfaces. Review and amend the baseline habitat to accurately reflect the on-site situation. An updated version of the metric has been submitted. Grassland area has been updated to 0.18 ha.
- The baseline metric and BNG report include woodland/tree habitat. It appears that only two trees associated with the southern hedgerow have Root Protection Areas (RPAs) extending into the redline (based on arboricultural survey report). Amend the metric and plans as necessary to ensure the baseline accurately reflects only habitats within the application boundary and any impacts arising from the development. An updated version of the metric has been submitted. Woodland and trees have been included in the baseline. There does not appear to be any woodland onsite so metric is inaccurate. Based on aerial imagery the site contains a building, hardstanding (road and parking) and grassland. It is possible that some trees in the adjacent hedge are onsite. Further amendments to the metric are required. Sections 4.21-4.22 (clarifications) of the Biodiversity Statement and Draft Biodiversity Gain Plan (Submission B, 09/03/2026) addresses this issue. Onsite planting was required by condition on previous application (21/00546/FUL). As this planting was not secured for BNG (submitted before mandatory BNG) there is no risk of double counting in the baseline of this application. Therefore, the baseline is accepted based on the information provided.

Information in the completed on-site baseline habitat tabs is accepted as accurate based on the information submitted. The pre-development (baseline) situation is summarised below.

|                                                       |                        |
|-------------------------------------------------------|------------------------|
| On-site pre-development (baseline) biodiversity value | 0.58 Habitat units     |
|                                                       | 0.00 Hedgerow units    |
|                                                       | 0.00 Watercourse units |
| Are there any <u>irreplaceable</u> habitats on-site?  | No                     |
| Has any habitat <u>degradation</u> of occurred?       | No                     |

Confirmation of how the development will achieve BNG is a post-determination matter however consideration should be given to how any proposed BNG will be secured.

## **CONDITIONS:**

### **1. Compliance with Submitted Documents**

The development will be carried out in strict accordance with the following documents:

- Sections 5.6 – 5.35 of the Preliminary Ecological Appraisal (Luscinia Ecology, 16/12/2025)
- Proposed Site Plan Rev. F (Padel4All Basset Down, Sept 2025)
- Tree Constraints Plan ARB-1991-02, Illustrative Material, Tree Survey, Arboricultural Impact Assessment & Tree Constraints Plan (WH Landscape Consultancy Ltd., Jan 2026)
- Proposed Elevations P2401 06 Rev A (Padel4All, Sept 2025)
- Location Plan P/2401/02 (Padel4All, Sept 2025)

REASON: For the avoidance of doubt and for the protection, mitigation and enhancement of biodiversity.

### **2. Lighting**

No external light fixture or fitting will be installed within the application site unless details of existing and proposed new lighting have been submitted to and approved by the Local Planning Authority in writing. The submitted details will demonstrate how the proposed lighting will impact on bat habitat compared to the existing situation. The plans will be in accordance with the appropriate Environmental Zone standards set out by the Institution of Lighting Professionals (ILP) Guidance Notes on the Avoidance of Obtrusive Light (GN 01/2021) and Guidance note GN08/23 "Bats and artificial lighting at night", issued by the Bat Conservation Trust and Institution of Lighting Professionals.

REASON: To avoid illumination of habitat used by bats.

**Sign off by WC Ecologist will only be given once ALL outstanding information has been submitted and agreed sufficient.**

|                   |            |
|-------------------|------------|
| Ecologist         | Date:      |
| Patrick Olshansky | 13/04/2026 |