

Planning Statement

WILT18 – Stockham Marsh, Wiltshire

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1. Introduction

This planning statement has been prepared by Environment Bank Ltd (EBL) in support of a full planning application for the construction of a series of ponds at Stockham Marsh, Wiltshire on behalf of the applicant. Pre-application advice was received from Wiltshire Council in May 2025.

The aim of this project is to create a series of 15 infield wetland features, scrapes, ditches and ponds (hereinafter referred to as the Ponds) which will play an integral role in providing new opportunities for wildlife, restoring the landscape to its former land use as marshland whilst also integrating with traditional farming systems. Works form part of a wider project which will create a 67.80ha habitat bank. Please see *“WILT18-PAP-P02 Development Plan”* detailing proposed works.

The development of wildlife areas within farms is an ever more critical part in creating a sustainable farm business and supports evolving government policy, as demonstrated by Agri-environment schemes and Biodiversity Net Gain. Both of which commit landowners to achieve environmental gains alongside their core productive agricultural activity. That is why EBL and the land manager at Stockham Marsh are working together to create a sustainable agricultural system that enhances and supports wildlife.

Crucially, the proposed Ponds will have a significant positive impact on lower parts of the catchment by holding water on the landscape during the winter.

2. Application Site

The Site is located at Stockham Marsh between Foxham and Spirthill villages, approximately 2.5 km south-west of Lyneham and is centred at grid reference ST 9990 7671. The Site extends to approximately 67.80 ha; it is dissected and bordered by hedgerows and has historically been in arable rotation for several decades. A small river, the Cade Burna, flows through the Site along with bridleway BREM9. Within the wider landscape of the Site, there are pockets of woodland, scrub and hedgerows.

The proposed Ponds are in Flood Zone 1 (at least risk of flooding).

3. Proposed Development

3.1 Proposal and Pond Design

The development consists of a series of 12 shallow ponds in a linear arrangement and 0.47km of new ditch across low lying areas, naturally intercepting surface water flows enabling the capture of water which will enhance ecological features and prevents physical damage from livestock poaching across the naturally wet corridor (see supporting document *“WILT18-EB-PLA - Waterbody Specifications”* for further detail including excavation and spoil information).

Included in the proposed works is a short section of culvert to the bridleway which will improve current condition and accessibility.

The proposed ponds and ditches will capture surface water providing an ecological feature, as well as providing drinking water sources for livestock grazing the site once established. The managed poaching of the pond by livestock will create habitat complexity, prevent single-species plant dominance and is valuable for many invertebrate species. The vegetation in habitats created will slow down and capture surface water runoff and in addition will aid in alleviating flooding downstream.

3.2 Location

The location of the ponds has been carefully assessed and designed by specialist professionals, the land manager alongside the EBL ecologists. The proposed pond areas are where surface water naturally collects, and which have been minimally productive and difficult to manage as part of an arable system. The arable land in the wider project is reverting to species rich grassland. The creation of the ponds will aid drainage of the surrounding grassland to minimise poaching and damage to the soil. Whilst the ponds will be fenced off in the first 2 years to allow the vegetation to grow on and stabilise the banks, after this they will be open to any grazing livestock to drink from, further enhancing the bank vegetation and habitat restoration.

The closest pond is approximately 173m from the Cade Burna bank top and are therefore outside of the streams Riparian Zone, as defined by The Statutory Biodiversity Metric User Guide (Defra, 2024).

3.3 Timing of Works

Pond creation has been scheduled for July – August to avoid impacts to ground nesting birds and prior to winter rains to allow ponds to naturally fill. Due to the wet lying nature of the ground, it is unfeasible to undertake the works at any other time of year.

4. Consultations

4.1 Flood Risk Assessment

A Flood Risk Scoping report was commissioned in May 2025 and is attached to this application as a supporting document “*WILT18-EXT-FRA-v01.00 – Stockham Marsh Flood Risk Assessment*”. It concludes due to the Sites position at the top of the catchment, the proposals have the potential to have a significant positive impact on flood risk further downstream. The report also states there are no proposed changes that will impact flood connectivity along the Cade Burna as well as reducing surface water runoff from adjacent fields. Finally, in addition it will have a positive impact on cumulative flood risk downstream due to locations of the ponds extensive existing surface water flow paths.

Existing drainage provisions during the build

There is a network of artificial ditches and drains that transport surface water flow through the site and into the Cade Burna watercourse. The ponds proposed will not interfere with their ability to convey infiltrated surface water throughout the duration of the project build window.

The four most western ponds will intersect an existing failing ditch to increase its capacity for water and provide natural flood management benefits with slowing the flow pathways before it meets the main river.

Operations will take place in summer months, when flood and compaction risk will be at their lowest. The contractor will work alongside EBL with emergency planning to remove any machinery, vehicles and equipment from the working area in advance of the working area becoming inundated during any forecast flood event. Contractors will sign up to receive flood warnings from the Environment Agency.

4.2 Water Impoundment

Consideration has been given to The Water Resources (Abstraction and Impounding) Regulations 2006. As the proposed development is to create naturally landscaped ponds, designed to have seasonally fluctuating water levels, there are no structures which would cause the development to fall within the Regulations. Furthermore, the proposed development does not impact or interfere with existing river channels.

4.3 Ecological Assessment

Consultation was undertaken with Wiltshire Council Ecology team in December 2023 on the wider site design. Feedback included further investigation into the water table for the purposes of reedbed creation due to its accompanying condition criteria. A hydrology feasibility report was commissioned and subsequently the reedbeds were removed from the design. A copy of the report can be found in supporting documents “*WILT18 - Stockham Marsh Feasibility Report*”. It should be noted the design was in its draft stage at the point of report commission and on subsequent advice, the ponds have been broken into smaller ponds with some being relocated to more suitable locations within the Site, however the contents and context remains valid.

4.4 Historic Environment Assessment

A Historic Environment Record (HER) search was commissioned in May 2025. This is also referenced in “*WILT18- Stockham Marsh Feasibility Report*”. It revealed a non-statutory demolished outfarm (ref: MW166686). The design was cross checked against the record point

to ensure that the proposed locations of the ponds did not overlap. A copy of search results can be found in supporting document “WILT18 EXT-HER- Historic Environment Glossary”.

5. Access

Access for the purposes of construction and maintenance will be via existing gateways and access point to the highway at Grid Ref SU0031 7642. No new vehicular access points to the highway will be created as result of the Pond creation.

The proposed timing of the excavation works has been purposefully chosen, prior to winter rains minimising the risk of ground damage from the necessary machinery (please see *WILT18-EB-PLA-V01.00-Waterbody Specification*), however should it be required due to adverse weather, additional bog matting will be used to protect the ground.

6. Landscape Considerations

The site lies within the Avon Vales National Character Area (NCA) which has been considered as part of the development proposal. The proposal seeks to support the following Statements of Environmental Opportunity (SEO).

SEO 1 - Protect, manage and enhance the semi-natural habitats, including the pastoral waterside landscape of permanent pasture and wet grassland, calcareous and neutral grasslands, and (as site appropriate) ponds, and investigate and pursue opportunities to create such habitats, to increase resilience to climate change, reduce soil erosion and provide benefits to the water environment and biodiversity in general.

The proposal specifically addresses a number of points highlighted to achieve this opportunity, in particular “Restoring, maintaining and extending flood meadows and wet woodland to enhance the landscape and cultural environment and the sense of place, and to increase water retention capacity for the benefit of flood alleviation” combined with “Restoring and re-creating ponds, for the benefit of wildlife in general and the enhancement of the landscape character”.

SEO 3 - Plan for the creation of new landscapes associated with the expansion of towns such as Chippenham, Melksham and Trowbridge, while incorporating the existing landscape features into green infrastructure planning. This will serve the interests of local landscape character, access and recreation, biomass provision, biodiversity and water flow regulation.

This will be achieved through “Developing woodlands and new wetland habitat within and around new development as a recreational resource and as part of sustainable urban drainage systems, to help regulate water flow”. There are no proposals to utilise the site for recreation due to its naturally wet nature, however the proposals will capture surface water flow, reducing downstream flooding. In addition, there is an existing public bridleway which runs through the centre of the site which will be preserved and enhanced through the provision of a new culvert.

SEO 4 – Protect and manage the varied rural landscape of small urban areas amid gently rolling arable and pasture, and thick hedges interspersed with small woods, securing wide-ranging views, reinforcing landscape character preventing soil erosion, promoting a sense of place and tranquillity, and providing recreational benefits.

This will be achieved through sensitive design, taking influence from historic landscape mapping to ensure that there is no detrimental impact on the rural character of the site and wider landscape.

The overall scheme complements the above SEOs and will blend seamlessly into the surrounding landscape. The ponds are designed to reflect the traditional rural character of Wiltshire and to replace a once more common landscape feature, forming part of a wider scheme which will create a diverse habitat.

As well as enhancing the local landscape, the ponds will seek to strengthen the local biodiversity in both the immediate future and long-term.

7. Planning Policy Context

The following policies are considered relevant to the proposed works at Stockham Marsh.

7.1 National Planning Policy Framework (NPPF) December 2024

The National Planning Policy Framework sets out the Government’s planning policies for England and how these should be applied. The following parts of the NPPF are considered relevant to the proposed development.

Part 6 – Building a strong, competitive economy

Para 88 Planning policies and decisions should enable:

- a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, new buildings;*
- b) the development and diversification of agricultural and other land-based rural businesses;*
- c) sustainable rural tourism and leisure developments which respect the character of the countryside; and*
- d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.*

Part 15 – Conserving and Enhancing the Natural Environment

Para 187, where relevant states:

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

- Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
- Recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the **best and most versatile agricultural land**, and of trees and woodland;*
- Minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*

The site lies partially within Grade 3 and Grade 4 designated area in Provisional Agricultural Land Classification mapping. Soil analysis undertaken in 2023 concludes the soil texture as clay with low levels of Phosphorus, Potassium and Nitrogen availability within soils. The low fertility of the land, heavy clay texture combined with its low and wet-lying nature results challenges accessing the land with modern farm machinery between October and April, severely impacting viability of crops which can be grown. When compared to Natural England Guidance on assessing development proposals on agricultural land and descriptions of land grades, the following are considered pertinent.

4.5 Subgrade 3b – moderate quality agricultural land

Land capable of producing moderate yields of a narrow range of crops, principally:

- *cereals and grass*
- *lower yields of a wider range of crops*
- *high yields of grass which can be grazed or harvested over most of the year*

4.6 Grade 4 – poor quality agricultural land

Land with severe limitations which significantly restrict the range of crops or level of yields. It is mainly suited to grass with occasional arable crops (for example cereals and forage crops) the yields of which are variable. In moist climates, yields of grass may be moderate to high but there may be difficulties using the land. The grade also includes arable land that is very dry because of drought.

<https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

The land has severe limitations and is only suited to grassland due to its wet lying nature. The land would be suitable for livestock grazing in spring and summers months; however winter grazing is limited by poor growth rates and risk of poaching. It is therefore considered the land is in majority Grade 3b and Grade 4 classification and therefore not at risk of removing BMV from production.

Para 192, where relevant states:

To protect and enhance biodiversity and geodiversity, plans should:

- *Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and*
- ***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***

Ponds form an integral part of habitat creation and will be the core of the enhancement at Stockham Marsh.

7.2 Wiltshire Core Strategy (WCS) 2015

The following parts of the Wiltshire Core Strategy are considered relevant to the proposed development.

CP1: Settlement Strategy & CP2: Delivery Strategy

The proposed development supports these two core policies by complying with the principles of sustainable development in a suitable location.

CP8: Spatial Strategy for the Calne Community Area

The WCS identifies the development site as being within the Calne Community Area, also stating development should be undertaken in accordance with CP1. The area is classified as rural open-countryside and the proposed ponds are designed to be a rural wetland landscape, thus not adversely affecting the classification of the land.

CP34: Additional Employment Land

CP34 includes the following summarised relevant points related to the types of development outside of principle settlements, market towns and local service centres that will be supported, and the criteria required to allow for the development to be acceptable:

(ii) development which supports sustainable farming and food production through allowing development required to adapt to modern agricultural practices and diversification.

Where they:

- a) *Meet sustainable development objectives as set out in the policies of this Core Strategy and;* The proposals meet the sustainable development objectives
- b) *Are consistent in scale with their location, do not adversely affect nearby building and the surrounding area or detract from residential amenity and;* Development is on agricultural land and will remain agricultural through management with agricultural cutting and grazing, therefore not detracting from the rural character of the area.
- c) *Are supported by evidence that they are required to benefit the local economic and social needs and;* Due to the wet nature of the land, it is uneconomic for arable production. The proposed development will align with the natural wet topography of the land, resulting in a sustainable land use around natural features.
- d) *Would not undermine the delivery of strategic employment allocations and;* The development will not undermine any strategy employment allocations.
- e) *Are supported by adequate infrastructure.* No new infrastructure is required as part of proposed development works.

The proposal to create a wetland habitat supports sustainable farming systems through the creation of mosaic landscape including grassland, scrub habitat and wetland features. The proposed land use is a reversion to a system practiced prior to the industrialisation of

agriculture. Since the land was converted to arable production, it has been minimally productive for agriculture, proving difficult to cultivate causing ramifications on soil health and surface water run-off. The proposal would sensitively fit within the rural landscape and with sustainable farming practices at the core of its future management.

CP50: Biodiversity and Geodiversity

CP50 outlines that Wiltshire's natural environment is one of its greatest assets. The wider site, Ponds and ditches have been carefully designed by ecologists and wetland specialists to ensure that they have the highest ecological integrity and also have a positive impact on biodiversity when compared to previous arable land use.

The Wiltshire Biodiversity Action Plan (BAP) is considered relevant to the proposals and in line with CP50. Within Standing Open Water Action Plan, SOWO2 specifically targets the expansion of the area of this habitat, including wetland and pond features. SOWT7 Targets and prioritises sites for wetland mosaic development, aligning with the proposed development at Stockham Marsh. Furthermore, Stockham Marsh historically was a traditional wetland further aligning with the target for this feature.

The site also falls within the Bristol Avon Catchment Partnership and the proposals are supported by three objective areas. The first is the improvement of water quality; by capturing surface and holding surface water within the landscape, the ponds will reduce surface water run-off and soil erosion into the Cade Burna. Secondly, the ponds will greatly improve biodiversity and ecological connectivity in the landscape. Specifically, Objective 3.1 aims to "Enhance and reconnect aquatic habitats across the catchment, restoring naturally-function ecosystems for the benefit of biodiversity". Measures include a catchment wide approach to natural flood management in headwaters

CP51: Landscape

Landscape character has been considered throughout the design of this site and is further addressed in Section 6 – Landscape Considerations. A Historic Environment Record search was undertaken for the site which included adjacent land. Stockham Marsh is noted within the report with the following comment *"This area is marked on the modern and historic maps as marshland. Despite some areas being parcelled up into enclosed holdings the dominant character of the landscape remains wet/boggy ground. It seems likely the character has changed little over time."* (See WILT18 – Historic Environment Record). The proposal aims to restore the landscape to its historic land use as a wetland landscape.

CP57: Ensuring High Quality Design and Place Shaping

CP57 Encourages the retention and enhancement of existing important landscaping and natural features including trees, hedges and watercourses. There will be no loss of existing features and the proposals will enhance the landscape connectivity.

CP61: Transport and Development

Construction traffic is limited to a single bulldozer and 13 tonne digger which will remain on site for the duration of the construction works, approximately five weeks. Therefore, it is not considered that any hardstanding improvements are required to the highway access point. Additionally, works are purposefully scheduled to take place during seasonally dry months in the year to further avoid adverse impact of construction traffic.

CP67: Flood Risks

The proposed ponds fall within Flood Zone 1, however consideration has been given to their location and to ensure that they have a positive impact on surface water capture. Further information can be found in “WILT18-EXT-FRA-v01.00 - Stockham Marsh Flood Risk Assessment”.

CP68: Water Resources

The design ensures compliance with this policy through contribution to Bristol Avon Catchment Management Plan.

7.3 Bremhill Parish Neighbourhood Plan – February 2018

The site lies within Bremhill Parish therefore the neighbourhood plan has been considered as part of this application. The development aligns with local objectives, specifically:

D. The local landscape and wildlife:

- *The plan will encourage sympathetic management of the countryside and natural environment within the Parish to enhance the quality of the landscape, improve wildlife habitat and conservation.*

E. Management of Water Courses and Flood Mitigation:

The plan will encourage new ways of reducing:

- *Flood risk and water pollution by sustainable management including tree planting through the Parish (especially the major watercourses and Rivers Avon and Marden, Cade Burna, Fishers Brook and Cowage Brook) by:*
- *Keeping open spaces which are used as flood management areas free from inappropriate development.*
- *Making sure that development minimises the impact on water quality.*
- *Identifying and acting on the risk of pollution.*

The proposed scheme will significantly enhance biodiversity within the parish along with sustainable water management along the Cade Burna, capturing surface water run-off, alleviating flooding downstream.

8 Conclusion

The proposal to create a series of ponds, ditches and culvert forms part of a wider scheme that will significantly enhance biodiversity and improve connectivity between existing habitats at Stockham Marsh. The topography of the proposed locations has been carefully considered to ensure positive benefits of surface water capture are realised. The proposal is supported by both the NPPF and WCS along with local Neighbourhood Strategy to conserve and enhance the natural environment whilst being sensitively positioned ensuring benefit for alleviating flooding downstream in the catchment.