

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jessica Cracknell
Date:	09/02/2026
Application Number:	PL/2025/05057
Proposal:	Two storey and single storey rear extensions and new vehicle access including bridge over adjacent watercourse
Site Address:	Braybrook, The Green, Marston, Devizes, SN10 5SW
Case Officer:	David Cox

Recommendations:

☐	No Comment
☐	Support
☐	No objection
☐	Condition (no objection subject to conditions)
☒	Objection - further information required
☐	Objection in principle
☐	HRA.

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date submitted)
1	Biodiversity Net Gain (BNG)	Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021)	09/02/2026 Submission of statutory metric calculation with the correct baseline habitats. (See comments in main text)	NO

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.

The following submitted documentation was reviewed to inform this response:

- Tree Protection Plan. October 2025. SJF Planning & Design Service. Drawing No. 2424-7. Issue. 2;
- Proposed Site Plan with BNG Enhancement. January 2025. SJF Planning & Design Service. Drawing No. 2424-8. Issue.1;
- Proposed Site Plan with Proposed Drive & Parking. November 2024. SJF Planning & Design Service. Drawing No. 2424-4. Issue. 4;
- Proposed Plans. July 2024. SJF Planning & Design Service. Drawing No. 2424-1. Issue. 5;
- Existing Block Plan 1:200. July 2024. SJF Planning & Design Service. Drawing No. 2424-3. Issue. 2.

Salisbury Plain Special Protection Area (SPA)

This application lies within the 6.4km zone of influence of the Salisbury Plain SPA and in light of the HRA for the Wiltshire Core Strategy and the HRA for the Wiltshire Housing Site Allocations Plan it is screened into Appropriate Assessment due to the potential impact of recreational pressure on stone curlew in combination with other plans and projects.

A test of likely significance has been carried out by the relevant Competent Authority (Wiltshire Council) as required by Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended). This concluded that given the scale and nature of the development combined with the separation of 5.5km between the SAC and the application site, any temporary construction impacts and operational impacts would be de-minimus. **The HRA has concluded that the application is not likely to have significant impacts on the SAC and subsequently the application is screened out of Appropriate Assessment.**

Biodiversity Net Gain

Under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) this application is required to deliver 10% Biodiversity Net Gain (BNG). The Biodiversity Gain Plan condition will automatically apply if approval is forthcoming.

A completed statutory biodiversity metric calculation (Small Sites Metric. 08 January 2026) confirming the baseline and predicted post- development biodiversity units of the site has been submitted.

The following issues must be addressed in the baseline prior to determination:

1. All the baseline habitat recorded within the redline boundary must be accurately recorded as to what is onsite. According to aerial photography and the existing site plan there is developed land sealed surface, existing building, trees, grassland and a watercourse. All baseline habitats within the redline boundary must be recorded.
2. The recorded baseline habitat 'urban/rural tree' within the Small Sites Metric has been classified as strategically significant: Formally identified in local strategy. Clarification of what strategy this is referring to is required. There is no formal identification of this habitat within a local strategy, and as such, the assessment must be amended accordingly.
3. A watercourse is identified on the Proposed Site Plan with BNG Enhancement (January 2025. SJF Planning & Design Service. Drawing No. 2424-8. Issue.1). Clarification is required as to whether this feature meets the definition of a watercourse under the statutory biodiversity metric and, if so, whether it should be recorded within the watercourse module of the small sites metric or assessed using the full statutory metric. In accordance with the User Guide ([The Small Sites Metric Statutory Biodiversity Metric - User Guide July 2025.pdf](#)), rivers, streams and canals must be included within the on-site baseline where the river channel or its riparian zone falls within the red line boundary. Where the red line boundary lies within 10 metres of a watercourse, the riparian zone must be included within the baseline habitats. The watercourse itself only needs to be included where direct works are proposed. Accordingly, the metric must be updated to record the watercourse habitats present onsite, including:
 - confirmation of the type of feature identified and whether it meets the metric definition of a watercourse;
 - confirmation of whether the red line boundary lies within the riparian zone; and
 - confirmation of whether any direct works are proposed to the watercourse or riparian zone.

The statutory metric calculation must be amended to accurately reflect the correct baseline habitats, and submit the updated metric to the Local Planning Authority (LPA) for review by the ecology team prior to determination.

The Biodiversity Gain Plan condition will require the submission of a Biodiversity Gain Plan demonstrating how the biodiversity objective (10% biodiversity net gain) will be met. The development can only legally commence once the Biodiversity Gain Plan condition has been discharged.

The Biodiversity Gain Plan must be accompanied by a completed Biodiversity Metric with the following issues addressed:

- Other Neutral Grassland is unlikely to achieve “good” condition within this environment, we would advise that the proposed condition should be revised to a more appropriate target.
- All habitats shown on the Proposed Site Plan with BNG Enhancement (January 2025. SJF Planning & Design Service. Drawing No. 2424-8. Issue.1), including hedgerows, trees and the pond, must be fully and accurately recorded within the biodiversity metric.
- All proposed habitat areas must be accounted for within the metric, whether habitats are retained, enhanced, lost or newly created. The submitted metric records 100 m² of habitat to be retained, 220 m² to be enhanced and 667 m² to be lost; however, the total area of lost habitat (667 m²) is not balanced by an equivalent area of habitat creation (0.0 m²). For area-based habitats, the total area of habitat lost must be matched by the total area of habitat created and/or enhanced, and the metric must be amended accordingly.

Note to case officer: The Statutory Biodiversity Metric identifies the areas of habitat creation/enhancement which contributes to the applications proposed BNG, however there are several inconsistencies and errors within the provided biodiversity metric. 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.

Core Policy 50

Core Policy 50 of the Wiltshire Core Strategy requires all development to demonstrate no net loss of biodiversity and to seek opportunities to enhance biodiversity. The NPPF also encourages applications to deliver measurable net gains (para 187 d).

While it is not expected that this development will result in significant loss of habitat, both CP50 and NPPF requires the inclusion of biodiversity enhancements. The location of these ecological/biodiversity enhancements must be included in the site plan drawings.

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

Ecologist	Date