

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	09/03/2026
Application number:	PL/2026/00049
Proposal:	Installation of polytunnel on small holding land
Site address:	Land South Of Conkwell Grange, Conkwell, Limpley Stoke, Wiltshire, BA2 7FD
Case officer:	Selina Parker-Miles

Recommendations:

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

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date)
a)	BNG	Environment Act 2021, Town and Country Planning Order 2015, CP50	09/03/2026 -Statutory metric and accompanying documents, as relevant	

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 consulting Ecology. I have reviewed the application and supporting documents against OS Maps, aerial photography 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:

- Design and Access Statement, WBC, December 2025
- BNG Justification Statement, WBC, January 2026
- Plan of site showing proposed and existing planting, unauthored/undated
- Polytunnel details, unauthored/undated

The site comprises a small parcel of land within a wider site used for growing produce, non-commercially. It is proposed to erect a polytunnel. The application site is neighboured by grassland fields in all directions, with a group of trees/wooded area ~15m west.

COMMENTS:

Bath and Bradford-on-Avon Bats Special Area for Conservation (SAC)

The site is located within multiple Bechstein's, Greater Horseshoe and Lesser Horseshoe roost buffers associated with the Bath and Bradford-on-Avon SAC. The current proposal therefore has potential to result in significant adverse impact on the special features of the Bath and Bradford-on-Avon SAC.

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 currently proposed development which (i) involves no loss of a roost of a qualifying species, (ii) does not propose any permanent structure nor loss of key bat habitat, and (iii) does not propose any additional external lighting, there is no mechanism for adverse impact on the Conservation Objectives of the SAC, and the proposal can be screened out of Appropriate Assessment.

Biodiversity Net Gain

From 12 February 2024 Biodiversity Net Gain (BNG) became mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). The applicant is seeking to apply an exemption, but it is not made clear which exemption would be relevant. For example, the de minimis exemption applies where less than 25 sq m of habitat (with biodiversity value greater than zero) and less than 5 metres in length of linear habitat is impacted. It is noted that approximately 60 sq m of grassland will be impacted by the installation of the polytunnel. Further, whilst the biodiversity metric allows for temporary impacts that can be restored within 2 years to be excluded from calculations (see Section 3 of [Government response and summary of responses - GOV.UK](#)), no timescale for the polytunnel use is provided, and it is assumed that it will remain in use beyond 2 years.

As such, I cannot see that this application meets any exemption from BNG, as defined here: [Biodiversity net gain: exempt developments - GOV.UK](#).

The application is therefore considered to be subject to the biodiversity gain condition, and must be accompanied by minimum information set out in [Article 7 of The Town and Country Planning \(Development Management Procedure\) \(England\) Order 2015](#), which includes:

- [the completed metric calculation tool](#) showing the calculations of the pre-development biodiversity value of the onsite habitat on the date of application (or proposed earlier date) including the publication date of the biodiversity metric used to calculate that value;
- a description of any [irreplaceable habitat](#) (as set out in [column 1 of the Schedule to the Biodiversity Gain Requirements \(Irreplaceable Habitat\) Regulations 2024](#)) on the land to which the application relates, that exists on the date of application, (or an earlier date); and
- plan(s), drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application (or earlier proposed date), including any irreplaceable habitat (if applicable).

Please also note that, in this case, the [small sites metric](#) could be used. Small sites metrics must be completed by a competent person, who does not need to be an ecologist. The applicant may also wish to apply the proposed planting (e.g., hedgerow and tree planting in wider area) as habitats to be created (or "habitat created in advance" if it has already been planted) within the metric, provided it has not been used as BNG and/or mitigation in association with any other application. However, the area of hedgerow planting is outside of the redline boundary of the current application. All land located outside the redline application boundary of the development site is considered off-site ([Make off-site biodiversity gains as a developer - GOV.UK](#)). All off-site

biodiversity gains sites must be registered on the national biodiversity gains site register. Off-site gains must be secured via a legal agreement for at least 30 years.

Alternatively, the applicant may wish to amend their redline boundary to deliver BNG on-site.

IN SUMMARY: Insufficient information has been submitted. The information outlined above must therefore be submitted and reviewed by the LPA's ecology team prior to determination of the application. I therefore maintain a holding objection until all the issues listed above have been suitably addressed.

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

Ecologist	Date
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