

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	09/03/2026
Application number:	PL/2025/09893
Proposal:	Retrospective planning application for a pole barn field shelter and building up of ground level.
Site address:	West Mill Farm, West Mill Lane, Cricklade, Swindon, SN6 6NB
Case officer:	Samantha Stockley

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)	No net loss of local biodiversity resource and ecological networks	CP50, NPPF, Habs Regs	09/03/2026 -Confirmation that no new external lighting is proposed/has been installed -Clarification on what habitats have been, or will require, removal -Compensatory measures for the loss of priority habitat	

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:

- Supporting Statement, Kernon, November 2025
- West Mill Farm Biodiversity Net Gain Exemption, Kernon, November 2025

The site comprises a grassland area associated with a livery yard, where retrospective permission is sought for the erection of a pole barn.

COMMENTS:

North Meadow & Clattinger Farm SAC

The development lies within the inner zone of influence (0-4.2km) for the North Meadow National Nature Reserve (NNR)/Site of Special Scientific Interest (SSSI) component of North Meadow and Clattinger Farm SAC, notified as an exceptional example of lowland meadow with a very high proportion of the surviving UK population of snake's head fritillary. The site is 100m southwest of the SAC. Under the Habitat Regulations 2017 (as amended) the development's potential to cause adverse effects through increased recreational pressure, which may occur alone or in combination with other plans and projects, must be considered.

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 (which is not development for overnight accommodation, or any development that will result in an increase in visitors to the SAC), there is no mechanism for adverse effect. 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.

Priority habitat

The area of land to be developed is located within a parcel of "floodplain grazing marsh" which directly connects to "lowland meadows" within the North Meadow & Clattinger Farm SAC, as mapped on Natural England's Priority Habitat Inventory. The site also backs onto the River Thames at the south. Floodplain grazing marsh and rivers are categorised habitats of principal importance, or priority habitats, under Section 41 of the Natural Environment and Rural Communities (NERC) Act. Paragraph 192 of the NPPF states that plans should:

"promote the conservation, restoration and enhancement of priority habitats".

Wiltshire's CP50 states:

"Development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value"

Had the proposal been submitted prior to the works being undertaken, it is likely that a Construction Method Statement (or similar) would have been required in order to ensure that the risk posed to these habitats was suitably managed during construction.

At present, the following information is required:

- Confirmation that no new external lighting is proposed/has been installed
- Clarification on what habitats have been, or will require, removal
- Compensatory measures for the loss of priority habitat

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). Based on the information available the biodiversity gain planning condition is not

considered to apply to this application as the proposal is for retrospective development, i.e. the planning application relates to development to which section 73A of the Town and Country Planning Act 1990 (planning permission for development already carried out) applies.

Note to case officer: you should be satisfied that the proposals meet the above criteria and act accordingly. Further information will be required from the applicant prior to determination in the event the application is considered to be subject to mandatory biodiversity net gain.

IN SUMMARY: Insufficient information has been submitted. In carrying out its statutory function, the LPA must be reasonably sure that the proposal will not result in significant adverse effects on protected and notable habitats. 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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