

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jessica Cracknell
Date:	18/03/2026
Application Number:	PL/2026/00924
Proposal:	Creation of new access to Bowmans Paddock from High Street, Winterbourne Bassett
Site Address:	Bowmans Paddock, Winterbourne Bassett, Swindon, Wiltshire, SN4 9QA
Case Officer:	Adrian Smith

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	Ecological Impact Assessment (EcIA)	NPPF, CP50	18/03/2026 Clarification is required regarding the extent of the proposals due to inconsistencies within the submitted Ecological Assessment (see comments in main text)	NO
2	Priority Habitat Deciduous Woodland	CP50, NPPF, Habs Regs	18/03/2026 Clarification regarding the degradation and clearance of priority habitat (see comments in main text)	NO
3	Biodiversity Net Gain (BNG)	Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021)	18/03/2026 Submission of statutory metric calculation with the correct baseline habitats, and associated baseline condition assessment sheets and maps. The redline boundary used in the BNG assessment must align with the redline boundary shown in all other site documentation.	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:

- Preliminary Ecological Appraisal. 19 November 2025. Wildwood Ecology. Report Ref. WWE25191 PEA;
- BNG Baseline Habitats. February 2026. Wildwood Ecology. WWE25191: Bowmans Paddock. Rev. A;
- BNG Post Development Habitats. February 2026. Wildwood Ecology. WWE25191: Bowmans Paddock. Rev. A;
- The Statutory Biodiversity Metric. 17 February 2026;
- The Statutory Biodiversity Metric – Technical Annex 1: Condition Assessment Sheets and Methodology;
- An Arboricultural Method Statement on Trees. February 2026. Sharples Tree Services;
- Proposed Site Rev C. February 2026. Home Plan Design Services. Drawing No. 25/3340/04;
- Existing Site. February 2026. Home Plan Design Services;

Protected Species

An Ecological Assessment has been submitted in support of this application, however this contains insufficient information to determine potential impacts on protected habitats and protected/ notable species. Clarification is required in relation to the proposals and the consistency of the information presented within the PEA and accompanying documents.

- Section 4.1 of the PEA references a new agricultural building as part of the proposals; however, this is not reflected within the planning application form. Clarification is therefore required to confirm the full extent of the proposed development and to ensure all submitted documentation accurately reflects the scheme.
- Section 5.2 states that all habitats are to be retained within the proposed development, whereas Section 4.1 identifies the removal of a section of the northern hedgerow to facilitate a new access. These statements are contradictory and require explanation.
- Section 5.3 of the PEA states that the development falls under the de minimis exemption for Biodiversity Net Gain (BNG), noting that impacts fall below the threshold of less than 25m² of habitat and 5m of linear features. The submitted BNG metric indicates that more than 5m of hedgerow is proposed for removal, which would exceed the threshold for the de minimis exemption.

Clarification is required to ensure that all documentation aligns with the current proposals and accurately reflects the extent of habitat loss and associated ecological impacts. In carrying out its statutory function, the LPA must be reasonably sure that the proposal will not result in significant adverse effects on protected habitats or species. 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.

Priority Habitat Deciduous Woodland

The area of woodland within the blue line boundary is listed as priority habitat deciduous woodland under section 42 of the NERC Act (2006). As such, this habitat is protected from development under Core Policy 50 of the Wiltshire Core Strategy and under the National Planning Policy Framework (NPPF). In accordance with Core Policy 50, 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, connectivity and functionality in the long-term. Where it has been demonstrated that such features cannot be retained, removal or damage shall only be acceptable in circumstances where the anticipated ecological impacts have

been mitigated as far as possible and appropriate compensatory measures can be secured to ensure no net loss of the local biodiversity resource.

Section 4.2 of the Preliminary Ecological Appraisal (PEA) states that *“the site was recently cleared of vegetation... onsite vegetation prior to site clearance comprised deciduous woodland, scrub and grassland.”*

Clarification and justification is required in relation to:

- the extent and nature of the site clearance,
- the reasons for the removal of habitats, particularly given their potential ecological value.

The submitted information suggests that priority habitat may have been lost or degraded prior to the submission of the application. Clarification is required regarding the current status of the site, including whether the habitats identified in the PEA remain present, or have been cleared. Where loss of priority habitat has occurred, any replacement or compensatory habitat would need to accord with Natural England guidance for priority habitat creation and is functionally linked to the surrounding ecological network.

Clarification is required as to whether a felling licence was obtained for the clearance of woodland, and whether any planning permission or other consent was granted for these works. At present, the only information held on the Council's records relates to a pre-application planning enquiry (14/09333/PDENQ) concerning site constraints, and no formal applications or consents for the clearance of this land have been identified. Confirmation of whether the proposed new planting (as shown within Appendix 2: Proposed development plan of the PEA) is intended as additional enhancement/mitigation, supplementary to the replacement compensation planting for the loss of priority habitat woodland previously present within the blue line boundary (as shown on Appendices 1 and 4 of the PEA) must be provided.

The clearance of vegetation prior to the submission of any future application represents habitat degradation, which has the potential to reduce the site's baseline biodiversity value. In accordance with the Environment Act 2021, where degradation of habitat has occurred within the relevant legislative timeframes, the pre-development biodiversity value must be taken as the value of the habitat immediately prior to the degradation taking place, regardless of whether the activities were authorised or unauthorised. Any future applications for the site will need to ensure that the Statutory Biodiversity Metric reflects the condition of the site before the clearance/degradation occurred, in order to establish an accurate baseline and secure the correct level of biodiversity gain in line with national policy and guidance.

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% automatically apply if approval is forthcoming. Biodiversity Net Gain (BNG). The Biodiversity Gain Plan condition will

A completed statutory metric calculation (17 February 2026) confirming the baseline and predicted post-development biodiversity units of the site has been submitted (including the condition assessment sheets and maps).

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

- **The redline boundary used for the BNG assessment within the BNG Baseline Habitats (February 2026. Wildwood Ecology. WWE25191: Bowmans Paddock. Rev. A) is different from the redline boundary shown on other documents, such as Proposed Site Rev C (February 2026. Home Plan Design Services. Drawing No. 25/3340/04), Location Plan and the Existing Site (February 2026. Home Plan Design Services). The redline application boundary and site boundary used for the BNG assessment must match within all provided documentation.**

Note to Case Officer: The *BNG Post Development Habitats* (February 2026. Wildwood Ecology. WWE25191: Bowmans Paddock. Rev. A) does not align with the *Proposed Site Plan Rev C* (February 2026. Home Plan Design Services. Drawing No. 25/3340/04). Within the submitted Preliminary Ecological Appraisal, “new planting is proposed along hedgerow within the blue line boundary to compensate for the loss of hedgerow on site.” However, this proposed mitigation is not reflected within the 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 186 d).

CP50 and NPPF requires the inclusion of biodiversity enhancements. Ecological Enhancements within section 5 of the Preliminary Ecological Appraisal are provided through the installation of bat and bird boxes. The location of these ecological/biodiversity enhancements must be included in the site plan drawings (see condition below) and will become an enforceable part of the planning permission.

CONDITIONS: these will be added once the issues above have been addressed

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

Ecologist	Date