

To: Edward Flood

From: Lis Weidt

Company: Stride Treglown

SLR Consulting Limited

cc:

Date: 16 April 2026

Project No. 402.065883.00001

**RE: Flood Resilience Measures Planning Application: PL/2025/07023
Ecological Response: Justification for Exemption from Biodiversity Net
Gain (BNG) Requirements**

Wiltshire Council request for further information

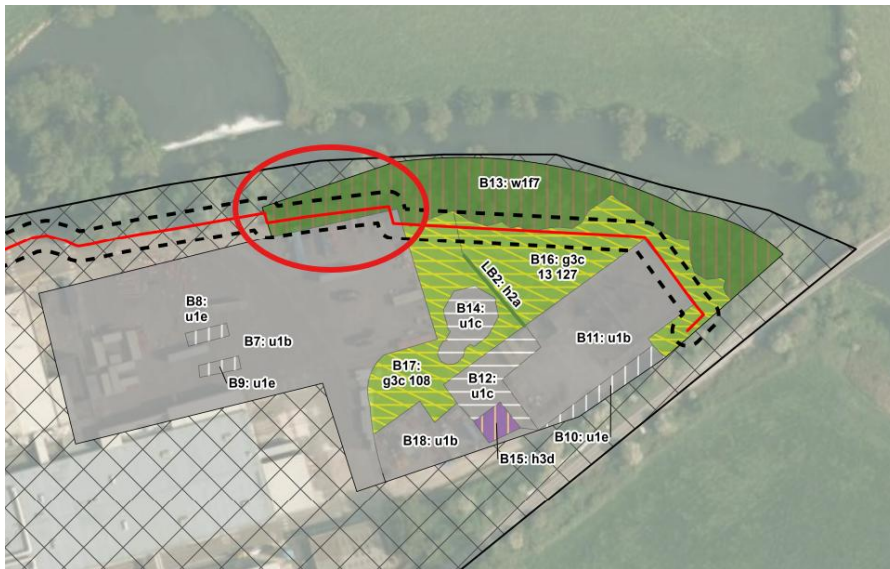
An ecology response received 07.04.26 requested further information in relation to planning application no: PL/2025/07023:

Biodiversity Net Gain (BNG)

*“The EcIA states that BNG is not required under the de minimis principle as the development site is under 25 square metres and no priority habitat is being lost. We note that the new kerb passes through an area of woodland identified on Figure 1 of the EcIA, the UK Habitat Baseline: **further information is required to measure the woodland habitat impact loss and the grassland habitat impact/loss to confirm whether the BNG de minimis principle can be applied.**”*

It is assumed that this comment refers to the location circled in red below (see Figure 1).

Figure 1: Area of woodland referred to within this response.



SLR Ecology Response

The area where the proposed flood defence kerb is shown as passing through woodland does not comprise trees or woodland ground flora. This area is instead characterised by tree canopy over silt above heavily managed, species-poor grassland, with no woodland understory present (see Figure 2). This is a mapping artefact arising from the UK Habitat Classification-down assessment method, as the area is mapped as woodland due to canopy cover despite the underlying habitat being managed grassland.

Figure 2: Photo showing area of the proposed kerb works, showing heavily managed, species-poor grassland beneath adjacent tree cover, with no woodland ground flora present.



As detailed within the Ecological Impact Assessment (EclA) Section 5.6;

“In the grassland areas the existing grassland turves within the works area will be carefully lifted and temporarily stored. This process will be carried out in a manner that preserves the integrity of the turves, ensuring their viability for reinstatement.

Following the completion of kerb installation, the stored turves will be reinstated around the kerb footings to restore the original grassland cover and minimise any permanent loss of habitat. This approach will significantly reduce ecological disturbance and support the retention of the existing grassland character and species composition.”

Although the works lie within the root protection areas (RPAs) of adjacent trees, the ground is heavily managed, compacted, and located adjacent to existing hardstanding. As such, no loss of woodland habitat, woodland soils, or priority vegetation will occur as a result of the works. Appropriate measures detailed within the CEMP will be implemented to ensure tree roots are protected and that no damage occurs to existing features of ecological value.

On this basis, the works will not result in a measurable loss of woodland or grassland habitat, and it is considered that the Biodiversity Net Gain de minimis exemption remains applicable.

Regards,

SLR Consulting Limited

Lis Weidt, BSc MCIEEM
Principal Ecologist

