

9454/CBS/110626/PL v3
11th June 2026

Dear Caroline,

Vale Cottage, Stert, Wiltshire

I am pleased to provide the below ecological letter report to accompany submission of your retrospective householder planning application for works undertaken at Vale Cottage, Stert.

This report has been prepared in response to a planning enforcement letter on the Site for the below works, which are detailed within the *"Site Plan showing extent of new external works"* DWG No 1183-20-101 (May 2026). Although the works are minor and relatively insignificant, it is understood that the works require retrospective planning due to being located within a conservation area.

The enforcement letter (dated 02/03/2026) stated the alleged breach as *"unauthorised engineering operations/works concerning the dredging/reprofiling of ponds and the depositing of a large amount of spoil on paddock land including unauthorised works to trees in a Conservation Area"*.

Background and Report Scope

The red line boundary covering Vale Cottage, the gardens and adjacent paddock consists of approximately 1.1ha of land.

The new owner of the Site has recently obtained numerous homeowner consents to authorise a series of minor works, most recently;

- PL/2024/00195, approved 07/03/2024 (Replacement of perimeter fencing and gates to the property),
- PL/2024/01962, approved 04/04/2024 (Notification of proposed works to trees in a conservation area – affecting 10 trees),
- PL/2024/04755, approved on 30/09/2024 (New swimming pool and pool house, new boat store, new garden store, new greenhouse and alterations to garden wall) and
- PL/2025/03948, approved 19/06/2025 (New Treatment Plant to replace existing foul drainage system).

This report provides an ecological assessment for the works listed within the retrospective application, focusing on the items specifically referenced within the enforcement letter. A separate arboricultural report is being prepared assessing impacts to the trees referred to within the letter.

Methodology

Clarkson & Woods Ltd were commissioned in March 2026 to undertake an ecological survey of the grounds within Vale Cottage to inform this letter report. A baseline walkover and habitat survey was carried out on 31st March 2026, based on standard field methodology set out in the UK Habitat Classification System¹, with condition assessment data

¹ UKHab Ltd (2023) *UK Habitat Classification System Version 2.0*. Available at: <https://ukhab.org>

recorded as per Statutory Biodiversity Net Gain guidance^{2,3}. The survey was undertaken by Rebecca Sandey (BSc (Hons)), an experienced senior ecologist, who has > 7 years' experience undertaking ecological surveys and holds an MSc in Biodiversity, Wildlife and Ecosystem Health. Rebecca has a level 4 FISC field identifications skills certificate for the identification of vascular plants. Five grassland quadrats were undertaken within G1 (the southern garden area). Quadrats of the paddock (G2) were however not undertaken as the walkover confirmed that the grassland was such low diversity that none were necessary.

All works being applied for retrospective consent are now complete.

The application is considered to be exempt from Biodiversity Net Gain, as it is a 'householder application'⁴.

A desk study using freely available online resources was undertaken to inform this letter. This included a search of the local planning portal⁵ for relevant historic applications on the Site, a search for designated sites, relevant land-based schemes, priority habitat inventory and protected species licensing through MAGIC⁶, a search of relevant planning policies via the Wiltshire's Core Strategy⁷, a search of Clarkson & Woods' in-house database and a search of Wiltshire and Swindon's Local Nature Recovery Strategy⁸ for relevant target actions. Purchase of data from Wiltshire records centre was not considered to be required, nor proportionate to the proposals.

² Defra (2024). *The Statutory Biodiversity Metric: User Guide*. London

³ Defra (2024). *The Statutory Biodiversity Metric: Technical Appendix 1 – Condition Assessment Sheets and Methodology*. London

⁴ <https://www.gov.uk/guidance/biodiversity-net-gain-exempt-developments>

⁵ <https://development.wiltshire.gov.uk>

⁶ <https://magic.defra.gov.uk/MagicMap.html>

⁷ <https://www.wiltshire.gov.uk/planning-policy-core-strategy>

⁸ <https://www.wiltshire.gov.uk/article/8288/Wiltshire-and-Swindon-Local-Nature-Recovery-Strategy>

Findings and Assessment

Designated Sites and Planning Policy

The Site is not located in, or within at least 1km of, any designated sites. The closest internationally designated site is Salisbury Plain Special Area of Conservation (SAC)⁹ located c.3.8km south (along with its associated Site of Special Scientific Interest – SSSI). The proposals are extremely small scale and have no impact on this designated site. The closest nationally designated site is Stert Brook Exposure SSSI, designated for geological interest, located 1.3km southwest. No impacts to this SSSI would have occurred due to the scale, type of works and distance from the Site.

The Site lies outside any consultation zones for SACs (i.e. is >10km from the Mells Valley bat SAC banding).

A search of the Wiltshire Core Strategy identified the following relevant ecological planning policy:

Core Policy 50 Biodiversity and geodiversity Protection *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, and secure the integrity of local ecological networks and provision of ecosystem services. All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development. Any development potentially affecting a Natura 2000 site must provide avoidance measures in accordance with the strategic plans or guidance set out in paragraphs 6.75-6.77 above where possible, otherwise bespoke measures must be provided to demonstrate that the proposals would have no adverse effect upon the Natura 2000 network. Any development that would have an adverse effect on the integrity of a European nature conservation site will not be in accordance with the Core Strategy.*

Biodiversity enhancement: *All development should seek opportunities to enhance biodiversity. Major development in particular must include measures to deliver biodiversity gains through opportunities to restore, enhance and create valuable habitats, ecological networks and ecosystem services. Such enhancement measures will contribute to the objectives and targets of the Biodiversity Action Plan (BAP) or River Basin/ Catchment Management Plan, particularly through landscape scale projects, and be relevant to the local landscape character. Local sites Sustainable development will avoid direct and indirect impacts upon local sites through sensitive site location and layout, and by maintaining sufficient buffers and ecological connectivity with the wider environment. Damage or disturbance to local sites will generally be unacceptable, other than in exceptional circumstances where it has been demonstrated that such impacts: i.e. cannot reasonably be avoided ii. are reduced as far as possible iii. are outweighed by other planning considerations in the public interest iv. where appropriate compensation measures can be secured through planning obligations or agreements. Development proposals affecting local sites must make a reasonable contribution to their favourable management in the long-term.*

⁹ Designation <https://sac.jncc.gov.uk/site/UK0012683>

Habitats

A baseline habitat map has been prepared based on the results of walkover survey, which is provided as Figure 1. Where habitats had been recently 'degraded' (i.e. recent spoil deposition in the paddock) the habitat has been mapped based on likely pre-degradation value, using historic aerial imagery and professional judgement, as well as the fact that post survey the grassland has since been restored. Site photographs are provided in Appendix A.

Grassland: g4 Modified Grassland

The majority of the Site was classified as G4 Modified grassland, with quadrats dominated by Yorkshire Fog *Holcus lanatus*, with creeping bent *Agrostis stolonifera* and creeping buttercup *Ranunculus repens* recorded frequently. G1 was recorded in Moderate condition with an average of 8.2 species/m². At the time of the walkover visit in late March, the grassland within the paddock (G2) was particularly lacking in floristic diversity and recorded as being of Poor condition due to having <6 species/m² (consisting only of Yorkshire Fog and Perennial rye grass *Lolium perenne*). Quadrat data is presented in Appendix B.

The grassland in the west of the Site is technically classified as garden, however for the purpose of this assessment has been categorised as 'grassland' rather than 'vegetated garden'.

The grassland in the east of the Site has been referred to within the retrospective application as a 'paddock'. This area is not subject to any land-based schemes, nor is it shown as designated for any reason, including priority habitat. It is understood that the field was historically managed through cutting. Since 2023 it has been cut on a regular basis, with initial work focussing on removing abundant nettles and other weeds which had developed through lack of management. There is no prescribed management requirement for either area of grassland.

The enforcement letter specifically refers to works within the paddock. At the time of writing all spoil piles within the paddock have since been removed and spread thinly across the Site. The field has been harrowed and was sown with a meadow grass seed mix¹⁰ in April. This was agreed with the LPA enforcement officer as an appropriate action. It was necessary to get the seed mix applied urgently, due to pressures of the enforcement action but also to prevent pernicious weeds becoming dominant. As the applied mix was purely perennial grasses, to increase diversity in autumn 2026 the area can be subject to cut and collect, chain harrowed and oversown with a 100% native wildflower seed mix¹¹. Alternatively, discrete areas could be planted with wildflower turfs to expediate establishment of a higher diversity grassland. It is understood that future management will likely take the form of cut and collect rather than grazing due to the field's small size and difficulties in reliably sourcing grazing livestock at the correct time of year. The paddock area will need careful management within the first 1 – 2 years of establishment to reduce pernicious weeds and dominant grasses and subsequently be subject to 1 – 2 cuts/grazing per year (key period July – early Sept, with a potential post winter/early spring cut March – mid April). Although no specific management regime can be enforced for the area, the landholder is keen to create a biodiverse habitat within their ownership.

The grassland habitats are to be maintained as grassland, with a long-term view to increase floral diversity.

Grassland: Traditional Orchard

A small orchard area is present within the Site containing one mature fruit tree and a number of semi-mature or newly planted fruit trees. For the purpose of habitat mapping this has been shown as 'traditional orchard' however this area is not shown to be designated as a traditional orchard via the priority habitat mapping inventory. No works have occurred within, nor are proposed at a later date for this orchard area.

Lakes: Ornamental Lake or Pond

A large pond (0.08ha) is present in the southern area of the Site. This is a man-made ornamental feature, which was categorised as being in Moderate condition due to the lack of emergent, submerged or floating vegetation and factoring in the ongoing work surrounding the feature which means that a semi-natural habitat is not currently present. It is hard to estimate the historical condition of the pond as prior to the current landownership, it is believed

¹⁰ <https://meadowmania.co.uk/collections/wild-flower-meadow-wild-meadow-grass-seed/products/meadow-grass-seed-mix-wild>

¹¹ Such as <https://meadowmania.co.uk/collections/wild-flower-meadow-wild-flower-seed-mixes/products/native-traditional-british-100-wildflower-seed-mix>, <https://wildflowerexperts.com/products/meadowsow-all-perennials/>, <https://wildflowerexperts.com/wildflower-turf/>

that no previous management had taken place to maintain pond condition, with detrimental flooding being a regular occurrence due to a blocked water outlet. Additionally, there are reports that it was previously artificially stocked with fish which would have reduced the condition assessment. This pond has been subject to recent (2024 – early 2026) bank re-profiling and dredging works and is one of the key areas identified within the enforcement letter. Groundworks to the pond are now complete. It is noted that the pond consists of one large single feature rather than being two separate waterbodies as shown on OS mapping. It is understood that this has always been the case since the new owner purchased the property. The works have not only protected the neighbouring property from flooding but have also resulting in a minor benefit to biodiversity through dredging, to maintain the longevity of the feature. A pond planting specialist has been appointed to undertake planting of native species, following advice from Clarkson & Woods, using species listed as beneficial to wildlife¹² with a primary focus on great crested newts and bats.

Hedgerows: Non-Native & Ornamental Hedgerows and Native Hedgerows

A number of non-native (Hedgerows 1, 3, 5 and 8) and native hedgerows (Hedgerows 2, 4, 6 and 7) are present, with some (Hedgerows 1, 2, 5, 6, 7 and 8) having been recently planted within and surrounding the Site. Advice has been given to the current homeowner on species to target for planting, to promote use of native, species-rich mixes. The enforcement letter did not list hedgerows within their reasons for the alleged breach, and no hedgerow removal is proposed. Following recent ecological advice, a number of non-native species have been swapped for native species, to enhance the biodiversity of the Site.

Mixed Scrub

An area of mixed scrub was present to the north of the paddock and adjacent to the trackway into the north-east of the Site. This area was dominated by buddleia and covered approximately 0.02ha. The enforcement letter does not relate to this area of habitat, and no works are due to be undertaken here.

Individual Trees

Numerous trees of varying age and condition are present within the red line boundary. The unauthorised works referenced within the enforcement letter relates to a felled ash tree. As this tree has since been removed it is not possible to provide an ecological assessment of it.

It should be noted that not all trees present on Site are included within the baseline habitat plan due to their smaller size, or their inclusion within other features (e.g. being associated with hedgerows). The arboricultural and site plan should be referred to for exact numbers of trees currently present. As the proposals are exempt from BNG the habitat plan shown in Figure 1 excludes trees which have already been felled post 2020.

Numerous new trees have been planted within the Site since the new homeowner purchased the property in 2023. Further detail on these trees is provided in the arboricultural report.

Sparsely Vegetated Land: Tall forbs

A small area covering approximately 0.02ha was present in the very north-east of the Site within the boundary fencing. This area is believed to previously have had several trees growing in it, however at the time of the Site visit in April, the slope was dominated by nettles and comfrey, as well as other opportunistic tall forb species.

Urban Habitats: Developed Land; Sealed Surface, Artificial Unvegetated; Unsealed Surface, and Vegetated Garden

As well as the buildings and pathway areas which are referenced within all plans, the grassland in the north-west of the Site closest to the dwelling was assessed as being Vegetated Garden. This area covers approximately 0.08ha and includes terraces with non-native ornamental vegetation, as well as dedicated planting beds. Additionally, the area includes regularly mown amenity grassland which is associated with the house.

¹² As recommended in https://www.froglife.org/wp-content/uploads/2013/06/GCN-Conservation-Handbook_compressed.pdf, <https://www.rhs.org.uk/ponds/wildlife-ponds>, <https://www.bats.org.uk/advice/gardening-for-bats/bed-and-breakfast>, <https://www.rhs.org.uk/advice/pdfs/plants-for-bats.pdf> and <https://www.worcester.ac.uk/documents/encouraging-bats-guide.pdf>

The retrospective planning application covers the installation of a new terrace and retaining walls associated with the garden area, as well as several instances of replacement stone steps. It is believed that previously, these features were either in disrepair or were treated with creosote and required removal due to the health and safety risks associated with them.

Ditch

A short section of ditch was identified which feeds into the pond, which was approximately 40m in length. The ditch was assessed as being in a Poor condition due to the lack of floristic diversity within the feature, as well as being overly shaded and having sustained physical damage along the length of the ditch due to construction plant traffic associated with the pond works. It is understood however, that these works are now complete, and no further plant damage is expected in the western grassland areas within which the ditch lies. The retrospective planning application covers one area of brick headwall replacement which replaced the existing telegraph pole headwall, which is at the northern end of the visible ditch within the western grassland area.

LNRS Habitat Measures

The Site is not covered under any specific LNRS target habitat actions. The only wide-spread action identified covering the site is for 'Wider Countryside Measures' which includes **The Built Environment:** Improve urban biodiversity and permeability of the built environment for wildlife, **Nature Friendly Farming** Increase the wildlife value of farmland, deliver for wider environmental benefits (N/A), **Nature-Friendly Productive Forestry** Increase the wildlife value of Productive Timber Woodlands, deliver for wider environmental benefits (N/A), **Ponds** Increase the number and habitat quality of ponds across Wiltshire and Swindon, **Green and Blue Access Corridors** Maintaining and enhancing the environmental quality and wider benefits of Wiltshire's important linear green and blue access corridors (N/A) **Hedgerows and Dry Stone Walls** Increase the distribution and connectivity of Hedgerows and Dry Stone Walls and **Local Landscape Projects** Support and Fund projects that deliver Nature Recovery and Wider Environmental Benefits across Wiltshire and Swindon (N/A).



Title: Biodiversity Net Gain Baseline Habitat Plan	
Project: Vale Cottage	
Drawing no.: v1	Date: 14/05/2026

Legend:

- Existing tree
- Non-native and ornamental hedgerow
- Native hedgerow
- Ditches
- Artificial unvegetated, unsealed surface
- Developed land: sealed surface - Building
- Developed land: sealed surface
- Mixed scrub
- Modified grassland
- Ornamental lake or pond
- Traditional orchards
- Vegetated garden
- Tall forbs
- Bare ground
- Red Line Boundary

Data:
Base Maps: © Crown copyright and database rights 2024 Ordnance

Co-ordinate system: OSGB36 / British National Grid
 Scale: 1:570 @ A3

0 10 20 30 m

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Protected Species

The Site was assessed for its potential to support protected and notable species, specifically in relation to those areas subject to retrospective planning.

A summary of survey findings for species relevant to the local area, Site and habitats it supports is provided below.

No evidence of badgers or their setts were encountered on Site.

Existing trees and buildings were not subject to detailed external or internal assessment for their suitability to support roosting bats, however given the unlit, rural location of the Site both the buildings and some of the mature trees are likely to provide numerous potential roost features. The Site is considered likely to support a range of foraging and commuting bats. In the future should any further works be proposed to buildings or trees ecological advice should be sought to ensure that impacts on potential bat roosts are avoided or adequately mitigated.

The site is covered under the county-wide extensive target LNRS measure "Increase the population of bat species, and expand their ranges, particularly in areas close to existing populations"¹³. As detailed above, advice has been provided to the homeowner on bat friendly planting measures, which will assist towards this county-wide action.

No evidence of otter or water vole was encountered around the pond.

Great crested newts were confirmed present within the on-site waterbody in 2024 when contractors first commenced pond repair works. Works to reshape and restore the pond were required urgently in 2024 due to the fact that its previously eroding banks had contributed towards flooding of the neighbouring property. To rectify this the homeowner sought ecological assistance with regards to great crested newts and undertook the pond repair works with urgency to prevent any further flood damage. All works to the pond and surrounding terrestrial habitats occurred in line with wildlife legislation and under an approved great crested newt district licence (ref 2024-00630-EPS-DLL). The restored pond continues to provide potential breeding habitat for great crested newts. Dredging and proposed pond planting will enhance this habitat for breeding in the long-term. Terrestrial habitat within the Site continues to provide potential features of shelter and foraging habitat to maintain the favourable conservation status of the on-site great crested newt population.

The Site provides potential habitat for a range of common reptile species, such as grass snake and slow-worm, specifically in the garden/field margins. Grass snake, if present in the surrounding area, are also likely to use the restored pond. It is understood that spoil deposition occurred in summer 2024 and late (winter) 2025, across the open grassland area of the low diversity grassland (paddock). Works associated with this would have been unlikely to impact reptiles due to the fact the area impacted was sub-optimal for reptiles and did not provide hibernation potential (for the works winter 2025). The Site will continue to provide suitable habitat for reptile species.

The garden habitats provide various nesting and foraging opportunities for a range of bird species. It is understood that the tree works were all undertaken outside of the nesting period during winter. Any further work to any trees under separate consents or garden maintenance should be undertaken outside the nesting season to avoid any impacts on breeding birds.

¹³ <https://storymaps.arcgis.com/stories/b1728814fd2540509131166b73ff4e9a>

Summary

Following both the LPA enforcement letter, and subsequent advice provided by Clarkson & Woods it is considered that the Site has been adequately and sensitively restored/remediated. No adverse impacts on either priority habitats or protected species have occurred. The pond works were undertaken legally under a GCN district licence. Works to the trees, as referenced in the enforcement letter, are covered under the separate arboricultural report, however, have been mitigated through new tree planting across the Site.

The retrospective application is therefore considered to be legally and policy compliant.

If you have any questions or require any further detail in relation to the above, please do not hesitate to contact me.

Yours sincerely,

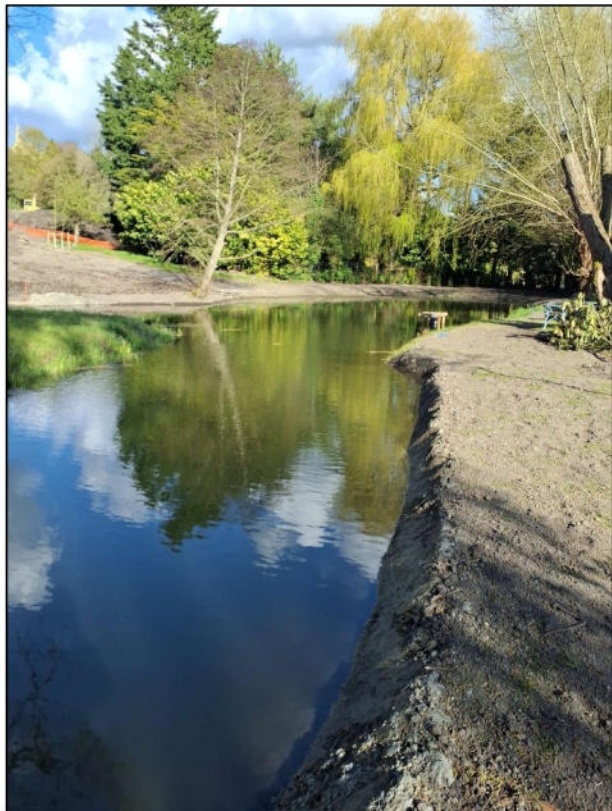


Polly Luscombe BSc (Hons) MSc MCIEEM

Associate Director

01934 712500

Appendix A: Site Photographs taken April 2026



Photograph 1: View of the pond looking east



Photograph 2: New native planting – Hedgerow 6



Photograph 3: Grassland within the western part of Site, looking west



Photograph 4: The grassland within the paddock, looking north

Appendix B: Grassland Quadrat Data

Species Recorded			G1				
			Grassland				
Group	Common Name	Scientific Name	Quadrat 1	Quadrat 2	Quadrat 3	Quadrat 4	Quadrat 5
Grass	Cock's Foot	<i>Dactylis glomerata</i>		20			
Grass	Common Bent	<i>Agrostis capillaris</i>		20			
Grass	Creeping Bent	<i>Agrostis stolonifera</i>	10		30		30
Grass	Perennial Rye Grass	<i>Lolium perenne</i>	20			11	
Grass	Sweet Vernal Grass	<i>Anthoxanthum odoratum</i>		10			
Grass	Yorkshire Fog	<i>Holcus lanatus</i>	50		30	30	30
Forb	Lords And Ladies	<i>Arum maculatum</i>	5			5	
	Moss Sp.	<i>Muscineae sp.</i>				20	
Forb	Common Mouse-Ear	<i>Cerastium fontanum</i>			6	7	7
Forb	Cow Parsley	<i>Anthriscus sylvestris</i>		15	10		4
Forb	Creeping Buttercup	<i>Ranunculus repens</i>	6	6	14	25	
Forb	Dove's-Foot Crane's-Bill	<i>Geranium molle</i>					3
Forb	Ground Ivy	<i>Glechoma hederacea</i>				16	5
Forb	Hogweed	<i>Heracleum sphondylium</i>		8			
Forb	Lesser Celandine	<i>Ranunculus ficaria</i>	4	5	20		5
Forb	Prickly Sowthistle	<i>Sonchus asper</i>					6
Forb	Red Dead-Nettle	<i>Lamium purpureum</i>					10
Forb	Self Heal	<i>Prunella vulgaris</i>		20			
Forb	Snowdrop	<i>Galanthus nivalis</i>					20
Forb	Stinking Iris	<i>Iris foetidissima</i>	5				
Forb	Yarrow	<i>Achillea millefolium</i>					2
Forb	Dandelion	<i>Taraxacum officinale</i>	✓	✓			
Total Number of Species			8	9	6	7	11