

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jessica Cracknell
Date:	18/03/2026 24/06/2026 updated comments
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 (EclA)	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)	YES 24/06/2026 Preliminary Ecological Appraisal (Amended April 2026). 20 April 2026. Wildwood Ecology. Report Ref. WWE25191 PEA.
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)	YES 24/06/2026 - Preliminary Ecological Appraisal (Amended April 2026). 20 April 2026. Wildwood Ecology. Report Ref. WWE25191 PEA; - Baseline habitat map. 2026. Wildwood Ecology Ltd; - The Statutory Biodiversity Metric. 14 April 2026. Wildwood Ecology.
3	Biodiversity Net Gain (BNG)	Schedule 7A of the Town and Country	18/03/2026 Submission of statutory metric calculation with the correct baseline habitats, and associated baseline condition assessment sheets and maps.	YES 24/06/2026 Preliminary Ecological Appraisal (Amended April 2026). 20 April 2026. Wildwood Ecology. Report Ref. WWE25191 PEA;

		Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021)	The redline boundary used in the BNG assessment must align with the redline boundary shown in all other site documentation.	• Baseline habitat map. 2026. Wildwood Ecology Ltd; • Proposed habitat map. 2026. Wildwood Ecology Ltd; • The Statutory Biodiversity Metric. 14 April 2026. Wildwood Ecology; • The Statutory Biodiversity Metric – Technical Annex 1: Condition Assessment Sheets and Methodology. 08 April 2026.
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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 (Amended April 2026). 20 April 2026. 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;
- Baseline habitat map. 2026. Wildwood Ecology Ltd;
- Baseline habitat map – Offsite habitat. 2026. Wildwood Ecology Ltd;
- Proposed habitat map. 2026. Wildwood Ecology Ltd;
- Proposed habitat map – Offsite habitat. 2026. Wildwood Ecology Ltd;
- The Statutory Biodiversity Metric. 14 April 2026. Wildwood Ecology;
- The Statutory Biodiversity Metric – Technical Annex 1: Condition Assessment Sheets and Methodology. 08 April 2026;
- An Arboricultural Method Statement on Trees. February 2026. Sharples Tree Services;
- Proposed Site Rev C. April 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.~~

Although the Extended Phase 1 Habitat Survey was undertaken outside the optimal botanical survey period, the assessment of impacts is considered acceptable in this instance. The proposed development would result in the loss of approximately 7.5 metres of hedgerow. At the time of the Preliminary Ecological Appraisal, habitats within the wider blue line boundary had already been cleared.

Bat Species

The site is considered to provide suitable habitat for foraging and commuting bats, primarily associated with the boundary hedgerows and scrub. The proposal includes the removal of approximately 7.5 metres of native hedgerow along the northern boundary to facilitate a new access, which may result in a reduction in habitat connectivity for commuting and foraging bats. However, subject to the retention of the majority of boundary features and implementation of proposed mitigation and compensation measures, including the planting of 2 additional trees within the applicant's wider ownership, it is considered that the overall functionality of the site for bats will not be adversely affected. Retained hedgerows should be buffered and enhanced where possible to maintain ecological connectivity across the site and surrounding landscape.

The habitat within the proposed development site and the surrounding area is suitable for roosting, foraging and commuting bats. Any new lighting should be for the purposes for safe access and security and be in accordance with the appropriate Environmental Zone standards set out by the Institute of Lighting Engineers in their publication GN01:2021, 'Guidance for the Reduction of Obtrusive Light' (ILP, 2021), and Guidance note GN08/23 "Bats and artificial lighting at night", issued by the Bat Conservation Trust and Institution of Lighting Professionals.

Nesting Birds

The adults, young, eggs and nests of all species of birds are protected by the Wildlife and Countryside Act 1981 (as amended) while they are breeding. Please be advised that works should not take place that will harm nesting birds from March to August inclusive. All British birds, their nests and eggs are protected under Section 1 of the Wildlife and Countryside Act 1981 (as amended) and the Countryside and Rights of Way Act 2000 while birds are nesting, building nests and sitting on eggs. The applicant is advised to check any structure or vegetation capable of supporting breeding birds and delay removing or altering such features until after young birds have fledged. Damage to extensive areas that could contain nests/breeding birds should be undertaken outside the breeding season. This season is usually taken to be the period between 1st March and 31st August but some species are known to breed outside these limits. Ecological enhancements are provided through the installation of bird boxes and stated within section 5.13 of the Preliminary Ecological Appraisal report. The location of ecological/biodiversity enhancements must be included in the site plan drawings and will become an enforceable part of the planning permission. Please see condition below.

Great Crested Newts (GCN)

The Preliminary Ecological Appraisal identified two off-site waterbodies located approximately 130m and 220m west of the site, indicating potential suitability for amphibian use given their proximity and the presence of semi-suitable terrestrial habitat within the wider site boundary. As such, the site has the potential to support amphibians for commuting and foraging, and habitat loss could result in a minor adverse effect. The Natural England Rapid Risk Assessment indicates that an offence is highly unlikely, which is supported in this case.

Reptiles

A precautionary method of working must be undertaken including a sensitive (phased) vegetation clearance methodology between the months of April and October, carried out under the supervision of a suitably qualified ecologist. Reasonable avoidance measures should be included within a construction method statement (CMS) which can be secured by condition. It is recommended within the Preliminary Ecological Appraisal report that a reptile mitigation strategy is created detailing the appropriate avoidance methods to

be undertaken during vegetation and refuge feature clearance works to prevent impacts on reptiles, which is welcomed.

Priority Habitat Deciduous Woodland

The area of woodland within the blueline 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 4 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.**

The Preliminary Ecological Appraisal identifies potential priority deciduous woodland within the blue line boundary. Based on the available evidence, it is not possible to conclusively confirm whether this habitat met the classification for priority habitat prior to its clearance. In the absence of certainty, a precautionary approach must be applied and the cleared habitat is treated as priority habitat for assessment purposes. Any loss must therefore be addressed in accordance with Core Policy 50, the NPPF and Biodiversity Net Gain (BNG) requirements.

The clearance of vegetation prior to submission constitutes habitat degradation. Although this area lies outside the red line boundary and does not form part of the current application, it must be addressed in any future proposals. **The Biodiversity Net Gain baseline of any future proposals within the identified offsite**

area should reflect the habitat condition prior to clearance, with losses compensated through the provision of equivalent or higher value habitat, delivered on-site or, where justified, off-site in accordance with statutory trading rules. Where no further development is proposed within the blue line boundary, the loss of habitat should be addressed through appropriate reinstatement or compensation to ensure no net loss of biodiversity. No evidence has been provided to demonstrate that such measures have been proposed. Any replacement or compensatory habitat should accord with Natural England guidance and maintain functional connectivity with the surrounding ecological network.

A Construction Method Statement should be secured by condition to ensure appropriate safeguards are in place during construction, including buffer zones and pollution prevention measures to protect the remaining priority habitat deciduous woodland identified south of the blue line boundary.

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 (14 April 2026. Wildwood Ecology) 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.~~

Information in the completed on-site baseline habitat tabs is accepted as accurate based on the information submitted. The pre-development (baseline) situation is summarised below.

On-site pre-development (baseline) biodiversity value	0.00 Habitat units
	0.06 Hedgerow units
	0.00 Watercourse units
Are there any irreplaceable habitats on-site?	No
Has any habitat degradation occurred?	No

Note to Case Officer: The [Proposed habitat map \(2026. Wildwood Ecology Ltd\)](#) does not align with the [An Arboricultural Method Statement on Trees \(February 2026. Sharples Tree Services\)](#). 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.” and the [An Arboricultural Method Statement on Trees](#) “To mitigate for the loss of trees, 2 trees will be planted in the locations marked on the Tree Protection Plan, BP/TPP.” 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.

The loss of habitat within the wider blue line boundary has been considered within the submitted BNG assessment. However, as the current proposals relate only to development within the red line boundary, the assessment of impacts is limited to the application site. The loss of habitat remains a material consideration and must be addressed in any future proposals affecting the wider landholding. This would require inclusion within a BNG baseline, accounting for degradation, or the reinstatement of equivalent habitat where no development is proposed.

The submitted metric indicates 0.25 biodiversity units or less will be required to meet the 10% BNG requirement and that on-site BNG is not achievable. In these circumstances statutory credits can be bought without providing evidence that insufficient off-site options are available in England. For further information please refer to guidance on Statutory Biodiversity Credits on the GOV.UK website (<https://www.gov.uk/guidance/statutory-biodiversity-credits>) under 'How to prove statutory credits are needed'.

Off-site Biodiversity Gain Site

It is intended that an area of land shown on Proposed habitat map (2026. Wildwood Ecology Ltd) and Proposed habitat map – Offsite habitat (2026. Wildwood Ecology Ltd) would be enhanced to achieve a 10% gain.

All land located outside the redline application boundary of the development site is considered off-site (refer to information here [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. Guidance on how to register a biodiversity gains site including a list of item required to apply can be found here - [Register a biodiversity gain site - GOV.UK](#). In order for the Biodiversity Gain Plan condition to be discharged all off-site gains must be shown on the Biodiversity Gain Plan as allocated to this development on the national biodiversity gains site register.

Off-site gains must be secured via a legal agreement for at least 30 years. This must be a planning obligation (Section 106 agreement) or conservation covenant. Wiltshire Council will not enter into a Section 106 agreement for off-site gains unless the off-site gain site has been verified. Contact ecologychargeableservice@wiltshire.gov.uk to request further information on site verification.

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:

1. Compliance with submitted documents

The development will be carried out in strict accordance with the following documents:

- Preliminary Ecological Appraisal (Amended April 2026). 20 April 2026. Wildwood Ecology. Report Ref. WWE25191 PEA;
- Baseline habitat map. 2026. Wildwood Ecology Ltd;
- Proposed habitat map. 2026. Wildwood Ecology Ltd;
- The Statutory Biodiversity Metric. 14 April 2026. Wildwood Ecology;
- The Statutory Biodiversity Metric – Technical Annex 1: Condition Assessment Sheets and Methodology. 08 April 2026;
- An Arboricultural Method Statement on Trees. February 2026. Sharples Tree Services.

REASON: For the avoidance of doubt and for the protection, mitigation and enhancement of biodiversity.

2. Ecological Enhancements

Prior to the commencement of any works, including vegetation removal and demolition, details of the number, design and locations of ecological enhancement features including bat boxes and bird boxes shall

be submitted to the Local Authority for approval. The approved details shall be implemented for the lifetime of the development and before completion of the final works.

REASON: To provide mitigation /enhancement for biodiversity.

3. Construction Method Statement

No development shall commence on site (including any vegetation removal or works to existing structures), until a Construction Method Statement has been submitted to, and approved in writing by the Local Planning Authority. The Construction Method Statement shall include all precautionary measures to be implemented during the construction period, for the protection of sensitive habitats and species known to be present within or adjacent the site, with particular reference to nesting birds, reptiles, priority habitat deciduous woodland.

The development shall be carried out in strict accordance with the approved Construction Method Statement.

REASON: To ensure adequate protection, mitigation and compensation for protected species and priority habitats throughout the construction period.

Final sign off – all matters addressed:

Ecologist	Date
Jessica Cracknell	24/06/2026