

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	07/10/2026
Application number:	PL/2026/05311
Proposal:	Construction of new field access
Site address:	Land northeast of Heath Cottage, Moor Lane, Garsdon, Malmesbury, SN16 9NW
Case officer:	Alex Edge

Recommendations:

☐	No Comment
☐	Support
☐	No objection
☒	Condition (no objection subject to conditions)
☐	Objection - further information required
☐	Objection in principle
☐	HRA completed

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:

- Letter Re: Biodiversity Net Gain, Bengrove Ltd, August 2026
- Preliminary Ecological Appraisal, Cotswold Environmental, August 2025
- Statutory Biodiversity Metric, Matt Davis, August 2026
- Baseline Habitats, Bengrove Ltd, August 2026
- Proposed Habitats, Bengrove Ltd, August 2026
- Planning Statement, RCC Town Planning Consultancy, August 2026
- Combined Plans, A M Design, March 2026

The site comprises a proposed entranceway to sections of two adjoining fields, bordered by trees and hedgerows. It is proposed to construct new access through existing hedgerow. This application is one of four applications recently submitted to support a change of use to agricultural/equestrian use, and the creation of access, a track and barns. The fields connect to further fields in all directions, with some dwellings to the northeast and southwest, and woodland parcels in the wider landscape. The site does not fall within any designated sites or associated consultation zones.

COMMENTS:

Protected species

The proposed works will result in the removal of <0.01ha of grassland and 6m of hedgerow (species-rich native hedgerow with trees). The submitted ecology report makes clear that this hedgerow comprises 'priority habitat' as it is dominated by native woody species, as also confirmed in the BNG letter from Bengrove Ltd. Whilst Wiltshire's CP50 encourages the retention and protection of features of conservation value (such as priority habitats), the proposed 6m loss

is relatively minor in nature and will be somewhat 'mitigated' through the BNG process. Further, the wider site proposals will be expected to incorporate further improvements for biodiversity.

This level of loss is also not anticipated to pose significant risk to badgers, reptiles or amphibians. The boundary hedgerow may, however, be of some value to nesting birds, bats and dormice.

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 (such as vegetation clearance) from March to August inclusive. Structures or vegetation capable of supporting breeding birds should be checked prior to commencement, and any removal or altering of such features should be delayed until after young birds have fledged.

Bats

Whilst the hedgerow is reported to contain some trees with potential bat roosting features, these trees are to be retained and are understood not to fall within the current application site boundary.

The hedgerow is also likely to be used by commuting and foraging bats. However, there are already a number of gaps in this eastern hedgerow allowing for access further south, and to buildings to the north. There are intact hedgerows opposite, and surrounding the fields. Given the suitability of the site and surrounding areas for use by bats, a condition should be applied to ensure that any new lighting scheme is submitted to and approved by the LPA prior to implementation.

Dormice

Whilst the boundary hedgerows provide suitable foraging opportunities and nesting habitat for dormice, no evidence of activity was observed during the preliminary ecological appraisal. As noted above, this hedgerow is already fragmented (<30m to the southwest and 140m northeast) - it does not directly connect to any woodland parcels. The risk posed to dormice is therefore considered to be low, but the reasonable avoidance measures detailed within the ecology report must be adhered to, and secured via condition.

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

A completed statutory metric calculation (Statutory Biodiversity Metric, Matt Davis, August 2026) and maps supporting the baseline and predicted post-development biodiversity units of the site have been submitted. The estimated pre-development (baseline) situation is summarised below:

On-site pre-development (baseline) biodiversity value	0.02 Habitat units
	0.14 Hedgerow units
	0.00 Watercourse units
Are there any irreplaceable habitats on-site?	No
Has any habitat degradation of occurred?	No

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 submitted metric indicates that less than 0.25 biodiversity units 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'.

CONDITIONS:

1. Compliance with submitted documents

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

- Section 5 (Reasonable Avoidance Measures) of the 'Preliminary Ecological Appraisal, CE001569, Cotswold Environmental, August 2025'

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

2. Lighting

No external light fixture or fitting will be installed within the application site unless details of existing and proposed new lighting have been submitted to and approved by the Local Planning Authority in writing. The submitted details will demonstrate how the proposed lighting will impact on bat habitat compared to the existing situation. The plans will be in accordance with the appropriate Environmental Zone standards set out by the Institution of Lighting Professionals (ILP) Guidance Notes on the Avoidance of Obtrusive Light (GN 01/2021) and Guidance note GN08/23 "Bats and artificial lighting at night", issued by the Bat Conservation Trust and Institution of Lighting Professionals.

REASON: To avoid illumination of habitat used by bats and other wildlife.

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

Ecologist Abi Gazzard	Date 07/10/2026
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