

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jessica Cracknell (Ecologist)
Date:	12/08/2025
Application number:	PL/2025/02257
Proposal:	Outline planning application (with all matters reserved except access) for residential development, including the construction of up to 149 dwellings, new vehicular access with footways and cycleways, public open space, landscape and associated infrastructure.
Site address:	Land to the North of Whychurch Farm and West of Crudwell Road, Malmesbury
Case officer:	Gen Collins

Recommendations:

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

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date)
1	Ecological Parameters Plan	CP50, NPPF	12/08/2025 Submitted Ecological Constraints and Opportunities Plan must be amended to include wildlife corridors and buffers surrounding protected and retained habitats.	NO
2	Enhancements and Mitigation	CP50, NPPF	12/08/2025 Enhancement measures suggested in ecological impact assessment to be shown on site drawings/plans including bat and bird box locations.	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 consulting Ecology, I have reviewed the application and supporting documents against OS Maps and aerial photography of the site and surrounding area, together with GIS layers of statutory and non-statutory sites and existing records of protected species.

The following submitted documentation was reviewed to inform this response:

- Ecological Impact Assessment Addendum. 04 July 2025. EAD Ecology. Report Ref. 250704_P1084_Malmesbury EclA Addendum_Final01;
- Ecological Impact Assessment. 21 February 2025. EAD Ecology. Report Ref. 250221_p1084_Malmesbury EclA_Final01;
- eDNA Results. 22 April 2025. RSK ADAS Ltd. 1040079-AC-EAD;
- The Statutory Biodiversity Metric. 19 February 2025. EAD Ecology;
- Arboricultural Baseline Note. February 2025. The Environmental Dimension Partnership Ltd. Report Ref. edp8255_r02b;
- Arboricultural impact Assessment (Incorporating Tree Protection Measures). February 2025. The Environmental Dimension Partnership Ltd. Report Ref. edp8255_r003a;
- Design & Access Statement. 27 February 2025. Thrive Architects Ltd. Job No. GLEE240917. Rev. B;
- Planning Supporting Statement. February 2025. Tor & Co. Ref. 227612;
- Illustrative Masterplan. 24 February 2025. Thrive Architects Ltd. Job No. GLEE240917. Drawing No. IMP.02. Rev. A;
- Land Use Parameter Plan. 24 February 2025. Thrive Architects Ltd. Job No. GLEE240917. Drawing No. LUPP.01. Rev. A.

The application site does not lie within, or adjacent to any sites designated for nature conservation.

Protected Habitats and Species

- The site is reported to comprise of three fields of modified grassland, bound predominantly by species-rich native hedgerows, some containing mature broadleaved trees. One further mature tree was present within grassland in the southernmost field. A drainage ditch was present along the north-western site boundary and a small parcel of broadleaved woodland was recorded within a corner of the southernmost field.
- Phase I surveys undertaken in 2020 and updated in 2024, along with Phase II surveys completed in 2020 and updated in 2024 and 2025, confirmed the presence of the following protected and notable species: a 'good' population of slow worms, declining bird species of conservation concern (dunnock, house sparrow, linnet and stock dove), with Peregrine species recorded 10m from the eastern Site boundary and a minimum of ten bat species foraging and commuting across the site.
- Common pipistrelle and soprano pipistrelle were the most abundant species, followed by noctule, and Myotis species bats. The highest levels of bat activity recorded within the site during surveys were along the eastern boundary of the northern field, alongside hedgerows in the west of the site, and in the sheltered south-west corner of the site. As with adjacent land under consideration low levels of greater horseshoe bat, lesser horseshoe bat and barbastelle were recorded.
- The development would result in the loss of poor semi-improved grassland and sections of species-rich and species-poor hedgerow.
- As this site is located adjacent to three sites currently under consideration there is concern that collectively they will lead to the fragmentation and degradation of the existing ecological networks (hedges and ditches), especially for foraging and commuting bats.
- Paragraph 187d of NPPF states that *'planning policies and decisions should contribute to and enhance the natural and local environment by:.. (d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species'*
- **The Ecological Parameters Plan must align across all three sites to demonstrate how ecological functionality and connectivity will be maintained.**

Bat Species

The submitted survey work confirms that the site supports high levels of bat activity, with at least ten species recorded during surveys in 2020, 2024 and 2025. Common pipistrelle and soprano pipistrelle were the most frequently recorded species, followed by Myotis species and noctule. Light-sensitive species recorded included Myotis bats, long-eared bat, lesser horseshoe bat, greater horseshoe bat, and barbastelle.

A Ground Level Tree Assessment in 2024 identified two trees with potential roosting features. These trees will not be directly affected by the proposed development, and dusk emergence, dawn re-entry, and aerial tree climbing surveys in 2020, 2024 and 2025 recorded no evidence of roosting bats.

Elevated levels of bat activity were concentrated along the boundary hedgerows and adjacent woodland. Static detector surveys recorded the highest overall bat activity along the eastern boundary of the northern field (notably Myotis activity) and in the south-west adjacent to woodland (including a high concentration of noctule activity). The hedgerow network provides key commuting and foraging habitat for bats and will be predominantly retained. However, approximately 160 metres of hedgerow will be removed to facilitate access, which will reduce habitat connectivity and risks fragmenting east–west movement routes across the site. The proposed development must therefore ensure that key habitat features are retained and that any loss is mitigated through habitat creation and management, with measures to maintain ecological connectivity for bats.

The Ecological Impact Assessment states that the green infrastructure proposals include significant landscape buffers along the southern, western, and north-eastern boundaries, including woodland and hedgerow planting, to buffer these linear features from the development and maintain robust functional flight routes for bats, including light-sensitive species.

All identified key commuting and foraging routes must be retained, buffered and shown in the provided Ecological Constraints and Opportunities Plan, with replacement planting for lost sections of hedgerow to restore connectivity.

Ecological enhancements within Section 4 of the Ecological Impact Assessment are provided through the installation of bat boxes. The location of the bat and bird boxes must be included in the site plan drawings and will become an enforceable part of the planning permission. Habitat creation proposals, including new woodland, hedgerow planting and wildflower grassland, will enhance the site's ecological connectivity providing suitable foraging and commuting habitat for bat species.

The habitat within the proposed development site and the surrounding area is suitable for roosting, foraging and commuting bats. An increase in artificial lux levels can deter bats which could result in roost abandonment and/or the severance of key foraging areas. This will likely result in a significant negative impact upon the health of bat populations across the region. Artificial light at night can have a substantial adverse effect on biodiversity. 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. Suitable lighting to ensure dark foraging and commuting routes can be retained could be secured via condition.

Birds

A breeding bird survey undertaken in 2020 and updated in 2025 which recorded 19 species, with 13 species confirmed, probably, or possibly breeding on-site, including linnet, house sparrow, dunnock and stock dove. The proposed development will result in the loss of nesting and foraging habitats for bird species. To avoid impacts on nesting birds, habitat clearance will take place

outside the bird breeding season (March to August). If clearance is necessary during this period, a pre-commencement survey by a qualified ecologist will be conducted to confirm the absence of active nests. If active nests are found, a buffer zone will be established, and works will be delayed until the young have fledged.

Ecological Enhancements within Section 4 of the Ecological Impact Assessment are provided through the installation of bird boxes during construction. I am satisfied with the measures proposed to enhance the site for biodiversity which meets the requirements of CP50 and NPPF. **The location of the bird boxes must be included in the site plan drawings and will become an enforceable part of the planning permission.**

Badgers

A badger survey undertaken in 2020 with updated surveys in 2021 and 2024 identified a partially used outlier badger sett with a single entrance hole on the southwestern boundary of the site. Other evidence of badger activity, including paths, was recorded within the site, and the grassland, woodland, and hedgerows provide suitable foraging habitat for badgers. The outlier sett will not be directly affected by the development proposals, with a minimum 20m exclusion zone marked by post and rail fencing around any retained active badger sett prior to construction. Section 4 of the Ecological Impact Assessment states that prior to the start of construction, an updated survey of the site will be undertaken to confirm the status of sett. Where the retention of this sett, or any other setts identified, is not feasible, a Natural England Badger Development Licence will be obtained prior to commencement of works.

Great Crested Newts (GCN)

Site surveys in 2020 and 2025 identified three ponds within 250m of the site. Habitat Suitability Index (HSI) assessments were carried out in April 2025, followed by eDNA surveys of ponds 1 and 3, with pond 2 being dry at the time of survey. Both ponds returned negative eDNA results for GCN, therefore the species is considered to be absent from the site. The site offers suitable terrestrial habitat for amphibians which are likely used for foraging and commuting. As outlined in Section 4 of the Ecological Impact Assessment and subsequent Addendum, a precautionary method of working will be undertaken including a sensitive (phased) vegetation clearance outside of the hibernation season, carried out under the supervision of a suitably qualified ecologist. Additional precautionary measures, including the protection of retained hedgerows during construction through the use of temporary barriers, creation of a wildflower area, and creation of three hibernacula.

Reptiles

Site surveys in 2020 and 2025 recorded a 'good' population of slow-worm and low populations of grass snake in 2020, however this species was not recorded during the 2025 update survey. The proposed development would result in the removal of grassland and hedgerow sections, leading to a reduction in foraging and breeding habitat for slow-worm and grass snake, as well as the risk of direct impacts. A sensitive vegetation clearance strategy is proposed within the Ecological Impact Assessment, including possible translocation of reptiles to suitable retained habitat in the vicinity by a suitability qualified ecologist and installation of hibernacula in Public Open Space areas. New hedgerows, wetland, wildflower grassland, and SuDS features will provide suitable foraging, basking, and hibernation habitat once established.

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 (19 February 2025) confirming the baseline and predicted post- development biodiversity units of Site has been submitted (including the condition assessment sheets and maps).

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	26.02 Habitat units
	15.12 Hedgerow units
	0.53 Watercourse units
Are there any irreplaceable habitats on-site?	No
Has any habitat degradation of occurred?	No

In order for the council to fulfil its BNG monitoring responsibilities. A BNG monitoring contribution will be required and secured via a separate legal agreement.

Ecological Parameters Plan

The submitted Ecological Constraints and Opportunities Plan (25 February 2025. EAD Ecology in Ecological Impact Assessment Addendum. 04 July 2025. EAD Ecology. Report Ref. 250704_P1084_Malmesbury EcIA Addendum_Final01) is welcomed. However, it is noted that the **Ecological Constraints and Opportunities Plan does not align with the Illustrative Masterplan** (24 February 2025. Thrive Architects Ltd. Job No. GLEE240917. Drawing No. IMP.02. Rev. A). The Illustrative Masterplan shows the central hedgerow, which the Constraints and Opportunities Plan indicates will be retained, as being severed in two locations rather than one. This increases fragmentation and has the potential to adversely affect the ecological functionality of this feature. **All submitted plans, must align to ensure consistency in the proposed mitigation and enhancement measures, including the proposed biodiversity net gain.**

Whilst the hedgerows are largely retained dark buffers are not specified (m) on the plans or reports therefore the application does not demonstrate that they will be adequately buffered from the development to ensure functionality will be maintained. To ensure ecological functionality for foraging and commuting bats is retained it is expected that an undeveloped continuous dark corridor measuring at least 10m wide is provided along key bat habitat.

The EPP will become an 'approved document' of any outline permission granted and any reserved matters application must be in compliance with the plan.

The EPP must include:

2. Specify the minimum distance from each feature to the footprint of development e.g. to curtilage of properties, car parks, roads.
3. Specify the buffer distance from light sensitive ecological features where the increase in lux levels will be zero or, if lux contours have been modelled, show contour lines for 1, 0.5 or 0.1 lux depending on the sensitivity of ecological features
4. Identify where new habitats will be created on site, include **minimum area in hectares or length in metres and habitat type**
5. Identify areas where habitat enhancement will be undertaken, include **minimum area in hectares or length in metres and habitat type**, e.g. defunct hedgerow to be grubbed up and replanted

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

Final sign off – all matters addressed:

Ecologist	Date
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