

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	30/12/2025
Application number:	PL/2025/08977
Proposal:	Erection of 4 no. new dwellings with associated access, parking, landscaping and private amenity space.
Site address:	Land in East Grafton (to the north of the A338), East Grafton, SN8 3DB
Case officer:	Lucy Rutter-Dowd

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:

- Planning, Design & Access Statement, Fowler Architecture & Planning Ltd, November 2025
- Site Plan, Fowler Architecture & Planning Ltd, May 2025
- Ecology & BNG Assessment, ABR Ecology Ltd, October 2025
- Tree Protection Plan, Naturally Trees, April 2025
- BNG Context Plan, Fowler Architecture & Planning Ltd, October 2025
- Statutory Biodiversity Metric, Emily Parsons, October 2025

The site comprises an area of grassland where it is proposed to construct 4 dwellings. The site is bordered by residential properties to the east and south, an agricultural field to the northwest, and further grassland to the west under separate ownership, where a single dwelling is proposed (PL/2025/08985).

COMMENTS:

Protected species and habitats

The site does not fall within any protected site consultation zones or local wildlife sites and does not appear to contain any priority habitats. It comprises modified grassland with individual trees, ruderal vegetation and other neutral grassland at some of the boundaries. The site is connected to good habitat within the wider landscape (woodland 80m southwest and 180m north) by hedgerow and lines of trees. It is understood that four poplar trees are proposed for removal.

None of the trees on-site were not found to possess any potential bat roosting features, but it is considered likely that the site supports foraging and commuting bats, particularly given the presence of roosting bats in a property ~40m west (though the species recorded in said property

did not comprise Annex II bats). Much of the application site is currently unlit, including the tree line along the western boundary and open grassland area. As such, and in line with the ecology report's suggestion, **a lighting condition is recommended** to manage the residual risk to light-sensitive species such as bats. Improvements for bats should also be incorporated into the scheme, which would be in line with the NPPF and with CP50 which state that applications must ensure that gains for biodiversity, relevant to local habitats and wildlife populations, should form part of the proposed development. The ecology report's recommendations of bat and bird boxes, as well as bee bricks and proposed hedgerows, are welcomed. **Biodiversity enhancements should be secured via a condition.** The enhancement scheme should show details of the locations and types of features that will be installed, as well as the specifications of native and wildlife-friendly plantings.

There is one waterbody present within 250m of the site, which was assessed as being of "below average" suitability for use by great crested newts. Given the sub-optimal habitats present and the physical barriers between the site and said pond, it is considered unlikely that the site is of significant value to amphibians.

Some of the boundary habitats (i.e., tall ruderals) could have potential to be used by reptiles. However, most of the site is regularly managed and there are suitable habitats to the north for reptiles to disperse into.

Nonetheless, to ensure the risk posed to these species remains minimal and considering the scale of the works in combination with the neighbouring proposals, precautions for reptiles, and other taxa, should be detailed within a **Construction Method Statement (CMS), to be secured via a condition.** The CMS must also detail measures to ensure bats, badgers and nesting birds are not adversely affected by the construction works (e.g., during vegetation removal, or via noise, dust or vibration disturbances).

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, map and habitat condition assessments (*'Statutory Biodiversity Metric, Emily Parsons, October 2025'*; *'BNG Context Plan, Fowler Architecture & Planning Ltd, October 2025'*; *'Ecology & BNG Assessment, ABR Ecology Ltd, October 2025'*) confirming the baseline and predicted post-development biodiversity units of the site have been submitted.

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	3.22 Habitat units
	0.07 Hedgerow units
	0.00 Watercourse units
Off-site pre-development (baseline) biodiversity value	2.25 Habitat units
	0.67 Hedgerow units
	0.00 Watercourse units
Are there any irreplaceable habitats on-site?	No

Has any habitat degradation of occurred?	No
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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.

It is intended that an area of land off-site ('*BNG Context Plan, Fowler Architecture & Planning Ltd, October 2025*') 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.

CONDITIONS:

1. Compliance with submitted documents

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

- Site Plan, Fowler Architecture & Planning Ltd, May 2025
- Ecology & BNG Assessment, ABR Ecology Ltd, October 2025

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

2. 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 bats, nesting birds, badgers, reptiles and the bordering tree line. 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.

3. 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 sensitive 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 wildlife-sensitive habitats, including habitat used by bats.

4. Enhancements for Biodiversity

Prior to the commencement of any works, including vegetation removal and demolition, details of the number, design and locations of ecological enhancements – such as nesting opportunities for birds and roosting opportunities for bats – shall be submitted to the local authority for approval. The approved details shall be implemented before occupation of the final works.

REASON: To provide mitigation/enhancement for biodiversity.

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

Ecologist Abi Gazzard	Date 30/12/2025
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