

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jenna Buss
Date:	28/01/2026
Application number:	PL/2025/09192
Proposal:	Outline planning application with all matters reserved (except for access into the site) for the proposed development of up to 210 residential dwellings, and 0.75ha of employment land and ancillary uses, open space, vehicular and pedestrian accesses, landscaping, drainage measures and all other associated works including the demolition existing buildings and structures.
Site address:	Land at Penn Hill, Calne
Case officer:	Jonathan James

Recommendations:

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

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:

- Biodiversity Net Gain Technical Note. November 2025. HDA
- Ecological Assessment. November 2025. HAD
- Landscape Strategy Plan. October 2025. Turley
- Green Infrastructure Plan. November 2025. Turley
- Statutory Biodiversity Metric. November 2025. Filippo Faraone

Protected and Notable Species/Habitats

An ecological assessment was submitted in support of the proposals which is welcomed.

The site is assessed as being dominated by species poor agriculturally improved/modified grassland fields bordered by hedgerows with small areas of scrub, woodland and small seasonal ponds. The hedgerows are largely species rich native hedgerows with some species poor hedgerows also present.

The development has been designed to ensure that the loss of existing hedgerows, trees and scrub habitat is limited and where possible, these features are retained within areas of informal open space. Development design has also avoided the use of retained woodland, hedgerows

and mature trees as residential curtilages which is welcomed. The Submitted BNG metric however highlights that hedgerows of high distinctiveness will be lost to the proposals.

Bats

A Bat roost has been recorded with a building in the centre of the site, assessed as a non breeding roost of a small numbers of common pipistrelles. The proposal will result in the loss of a bat roost. Bats and their roosts are afforded stringent protection under the Conservation of Habitats and Species Regulations 2017 (as amended) and as such are a material consideration within the planning consultation process.

A European Protected Species (EPS) bat Mitigation Licence may need to be obtained for the lawful construction of this development. Mitigation in the form of replacement bat boxes are proposed to compensate for the loss of the bat roost. The type, number and location of these roosts has not been confirmed. This information must be submitted on an ecological parameters plan prior to commencement of works which could be secured by condition.

Trees with potential to support bat roosts were surveyed with no roosts identified. Due to the transitory nature of bat roosts in trees, pre commencement surveys are recommended which is supported.

Foraging and commuting was recorded which focussed on hedgerow and field boundaries primarily along the southern site boundary. Species included common and soprano pipistrelle, brown long eared, Leisler, Serotine, and Greater Horseshoe bat an Annex II bat species. It is noted that the development proposals seek to maintain the existing boundary features and the Green Infrastructure Parameters Plan demonstrates that a green corridor will bisect the centre of the site retaining commuting and foraging routes from north to south and east to west.

The site is currently largely unlit with the exception of the existing built development within the centre of the site. Recommendations that lighting should 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 is welcomed and should be secured by condition.

Badgers

Measures to retain opportunities for badger within the development site are required.

Badger should be retained and afforded a suitable buffer during construction with robust connections to the surrounding green infrastructure. If this is not possible and works are required within 30m of the sett, a licence from NE will be required. Pre-commencement badger surveys will be required and a mitigation strategy provided to ensure badgers are protected during the works. Management and monitoring of any mitigation required would need to be included within a LEMP and construction impacts considered within a CEMP, which can be secured by condition.

Reptiles

The site is assessed as supporting a low population of slow worm and grass snake. The retention and enhancement of habitats on site suitable to support reptiles is welcomed. However, consideration to the impacts on reptiles during construction must be considered. A mitigation strategy to include reasonable avoidance measures during construction must be submitted to and agreed by the LPA prior to commencement of works.

Amphibians

It is noted that six ponds are located within or immediately adjacent to the site. These were assessed to have limited potential to support GCN. Habitat suitability Index (HSI) surveys together with eDNA sampling was undertaken in 2022 and updated in 2025. The results indicate that GCN are absent from the sampled ponds despite their suitability.

It is therefore considered highly unlikely that GCN are present on site and have therefore been scoped out of further consideration.

The landscape proposals demonstrate that two of the ponds have been designed into the scheme and an additional four new waterbodies will be created as both stand alone water features or as part of the surface water drainage strategy. Those created for the latter purpose should be designed to ensure they retain water throughout the year to provide an ecological resource as well as functioning drainage.

The existing ponds are in poor condition and will require management, this should be detailed in a LEMP which can be secured by condition.

Birds

Specific bird surveys were not undertaken at the site. However, demolition works should be scheduled outside of the bird nesting season. 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.

The creation of the habitats proposed on site including additional wetland areas, an orchard, additional hedgerows and scrub are considered suitable to support a large variety of bird species. Impacts to ground nesting birds such as skylark however have not been considered, the surrounding habitat may be suitable to support displacement of any nesting opportunities lost but should also be a consideration within the CEMP and LEMP.

BNG

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. November 2025. Filippo Faraone) confirming the baseline and predicted post- development biodiversity units of the site has been submitted (including the condition assessment sheets and maps).

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

On-site pre-development (baseline) biodiversity value	36.63 Habitat units
	32.64 Hedgerow units
	0.00 Watercourse units
Are there	No

any irreplaceable habitats on-site?	
Has any habitat degradation of occurred?	No

The Biodiversity Gain Plan must be accompanied by a completed Biodiversity Metric with the following issues addressed:

- The creation of 3.61ha of Other neutral grassland in moderate condition is proposed, this is unlikely to achieve this condition within an urban environment, the proposed condition should be revised to a more appropriate target.
- There are too many net losses of High and Medium Distinctiveness hedgerow habitat and too few gains to offset these losses. The gains must be at least 10% and reflect gains at the correct distinctiveness category.

In order for the council to fulfil its BNG monitoring responsibilities. A Biodiversity Net Gain On-site 30year Monitoring Fee of £11165 must be paid prior to commencement of development and secured via legal agreement. In the absence of a S106 the fee can be paid by a section 111 agreement. Where the applicant elects to use the S111 process the fee must be paid and S111 signed by both the applicant and the council on the granting of planning permission.

CONDITIONS:

1. Prior to the commencement of works, including demolition, ground works/excavation, site clearance, vegetation clearance and boundary treatment works, a Construction Environmental Management Plan (CEMP) shall be submitted to the local planning authority for approval in writing. The Plan shall provide details of the avoidance, mitigation and protective measures to be implemented before and during the construction phase, including but not necessarily limited to, the following:
 - a. Identification of ecological protection areas/buffer zones and tree root protection areas and details of physical means of protection, e.g. exclusion fencing.
 - b. Working method statements for protected/priority species, such as nesting birds and reptiles.
 - c. Mitigation strategies already agreed with the local planning authority prior to determination, such as for great crested newts, dormice or bats; this should comprise the pre-construction/construction related elements of strategies only.
 - d. Work schedules for activities with specific timing requirements in order to avoid/reduce potential harm to ecological receptors; including details of when a licensed ecologist and/or ecological clerk of works (ECoW) shall be present on site.
 - e. Key personnel, responsibilities and contact details (including Site Manager and ecologist/ECoW).

Development shall be carried out in strict accordance with the approved CEMP.

REASON: To ensure adequate protection and mitigation for ecological receptors prior to and during construction, and that works are undertaken in line with current best practice and industry standards and are supervised by a suitably licensed and competent professional ecological consultant where applicable.

2. No development shall commence on site until a Habitat Management and Monitoring Plan (the HMMP), prepared in accordance with the statutory Biodiversity Gain Plan and including:
 - a non-technical summary;
 - the roles and responsibilities of the people or organisation(s) delivering the HMMP;
 - the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the statutory Biodiversity Gain Plan and schedule for implementation;
 - the management measures to maintain habitat in accordance with the statutory Biodiversity Gain Plan for a period of 30 years from the completion of development; and
 - the monitoring methodology and specification of a Monitoring Pack (to include but not exclusively up to date Management Actions Logs, Habitat Condition Assessment Reports, metric calculation; and corresponding post intervention Habitat Map) which shall be submitted to the Local Planning Authority in years 2 (two) 5 (five) 10 (ten) 15 (fifteen) 20 (twenty) and 30 (thirty) of the Maintenance Period,
 - has been submitted to, and approved in writing by, the local planning authority.
 - No [*consider occupancy trigger e.g. more than 50% units/floor space shall be occupied*) until the habitat creation and enhancement works set out in the approved HMMP have been implemented.
 - The created and/or enhanced habitat shall be managed and maintained in accordance with the statutory HMMP at all times thereafter.

REASON: To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990.

3. Prior to the commencement of any works, including vegetation removal and demolition, details of the number, design and locations of opportunities for bats and birds (e.g. bat and bird boxes) 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.

4. Prior to the start of construction, a Landscape and Ecology Management Plan (LEMP) shall be submitted to and approved in writing by the Local Planning Authority. The LEMP will include long term objectives and targets, management responsibilities and maintenance schedules for each ecological feature within the development, together with

a mechanism for monitoring success of the management prescriptions, incorporating review and necessary adaptive management in order to attain targets.

The LEMP shall be implemented in full and for the lifetime of the development in accordance with the approved details.

REASON: To ensure the long-term management of landscape and ecological features retained and created by the development, for the benefit of visual amenity and biodiversity for the lifetime of the scheme.

5. No development shall commence on site (including any vegetation removal or works to existing structures), until a mitigation strategy has been submitted to, and approved in writing by the Local Planning Authority. The mitigation strategy 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 badger and reptiles. Where required, the mitigation strategy shall also include details of any mitigation and enhancement measures to be applied. The approved details shall be implemented before occupation of the final works.

The development shall be carried out in strict accordance with the approved mitigation strategies.

REASON: To ensure adequate protection, mitigation and compensation

6. External lighting 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 green infrastructure.

INFORMATIVES:

Nesting Birds

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.

Bats

There is a low risk that bats may occur at the development site outside of the known roost. Many species of bat depend on buildings for roosting, with each having its own preferred type of roost. Most species roost in crevices such as under ridge tiles, behind roofing felt or in cavity walls and are therefore not often seen in the roof space. Bat roosts are protected all times by the Conservation of Habitats and Species 2017 (as amended) even when bats are temporarily absent because, being creatures of habit, they usually return to the same roost site every year. Planning permission for development does not provide a defence against prosecution under this legislation or substitute for the need to obtain a bat licence if an offence is likely. If bats or evidence of bats is found during the works, the applicant is advised to stop work and follow advice from an independent ecologist or the applicant is advised to follow the advice of a professional ecologist or to contact Natural England's Batline through the internet

Final sign off – all matters addressed:

Ecologist Jenna Buss	Date 29/01/2026
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