

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jessica Cracknell
Date:	23/02/2026
Application Number:	PL/2026/00462
Proposal:	Demolition of existing bungalow and erection of 2 no. detached dwellings
Site Address:	The Haven, Minety, Malmesbury, SN16 9QG
Case Officer:	Samantha Stockley

Recommendations:

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

An Appropriate Assessment for impacts on the North Meadow and Clattinger Farm Special Area of Conservation (SAC) has been completed and sent to Natural England for their agreement that the HRA can be favourably concluded. There is a statutory 21-day response window. The application must not be approved until NE have endorsed the conclusion of the AA.

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date submitted)
1	Biodiversity Net Gain (BNG)	Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021)	23/02/2026 Submission of statutory metric calculation with associated baseline habitat plans and condition assessments (see comments in main text)	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 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 (PEA). 12 December 2025. Ellendale Environmental. Version. CIC v1.0;
- The Statutory Biodiversity Metric. 15 December 2025. V1.0;

- Biodiversity Net Gain (BNG) Assessment. Ellendale Environmental;
- Block Plans. November 2025. Charles Manning. Drawing No. 400/RJM/2025/3;
- Block Plans. November 2025. Charles Manning. Drawing No. 1045/CAM/2025/4;
- Elevations & Floor Plans. December 2025. Charles Manning. Drawing No. 1045/CAM/2025/1;
- Elevations & Floor Plans. December 2025. Charles Manning. Drawing No. 1045/CAM/2025/2;
- Elevations & Floor Plans. December 2025. Charles Manning. Drawing No. 1045/CAM/2025/3;
- Supporting Statement. January 2026. Charles Manning;
- Design and Access Statement.

North Meadow and Clattinger Farm Special Area of Conservation (SAC)

The development lies within the outer zone of influence (4.2 – 9.4km) for the North Meadow National Nature Reserve (NNR)/Site of Special Scientific Interest (SSSI) component of North Meadow and Clattinger Farm SAC, notified as an exceptional example of lowland meadow with a very high proportion of the surviving UK population of snake's head fritillary. The development is screened into Appropriate Assessment under the Habitat Regulations 2017 (as amended) on account of its potential to cause adverse effects through increased recreational pressure, which may occur alone or in-combination with other plans and projects.

Wiltshire Council, Cotswold District Council and Swindon Borough Council in partnership with Natural England have produced an Interim (2023-2028) Recreation Mitigation Strategy for proposed development within this zone.

The standard mitigation agreed under the above strategy for all relevant (e.g., overnight accommodation) development of under 50 units in the Outer Zone is:

- Strategic Access Management and Monitoring (SAMM) contribution per unit £331.75

Full details of the mitigation strategy, affected developments, and current charge per unit can be found on our website [Biodiversity and development - Wiltshire Council](#).

Developer contributions can be secured using a S111 Agreement (prior to determination), Unilateral Undertaking or a S106 Agreement. The applicant should be directed to the Guidance Note for Completing Agreements Under S.111 of the Local Government Act 1972.

The LPA concludes that subject to the mitigation measures detailed in the Interim (2023-2028) Recreation Mitigation Strategy being secured via an appropriate method (see above), the Appropriate Assessment concludes no adverse effects on the integrity of the North Meadow and Clattinger Farm SAC. The AA has been sent to Natural England (23/02/2026) and the application must not be determined until they have agreed with the LPAs conclusion.

Protected Species

The Preliminary Ecological Assessment (PEA) identified no suitable roosting features within any of the on-site buildings and no evidence of roosting bats. The site is assessed to offering suitability for foraging and commuting bats, with the majority of the boundary vegetation to be retained as part of the development. The replacement dwelling will not require the removal of vegetation considered to be functionally important for bat foraging or commuting. No new lighting has been proposed as part of the development and in the absence of such, together with retention of all vegetation, it is very likely that the functionality of the habitats within the site and their availability to bats will not be adversely affected.

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. 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.

Where possible, vegetation removal should be scheduled outside the bird breeding season (1st March–31st August) to avoid potential disturbance. If removal during this period is unavoidable, a pre-works nesting bird

inspection must be conducted no more than two weeks before vegetation clearance begins. 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.

A precautionary method of working for reptiles and amphibians has been proposed with the PEA and is welcomed, including a sensitive (phased) vegetation clearance methodology between the months of March and October, carried out under the supervision of a suitably qualified ecologist. This will be secured by condition.

Biodiversity Net Gain (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 (15 December 2025. V1.0) confirming the baseline and predicted post- development biodiversity units of the site has been submitted.

The following issues must be addressed in the baseline prior to determination:

- Biodiversity Net Gain (BNG) Assessment report states “The defunct hedgerow on the boundary of the site is being retained, and it is understood that this is under the management of the adjacent residential properties to the south and Wiltshire Council to the north. Therefore these hedgerows have not been included within the metric.” Clarification is required as to whether the hedgerow lies within the red line boundary. If it does, the statutory biodiversity should be updated to include the hedgerow within the baseline habitat assessment (with appropriate condition assessment). If the hedgerow lies outside the application boundary, this should be clearly shown on the submitted plans. If the applicant has no control over the hedgerow habitat, they may need to provide evidence to confirm this and amend the red line boundary as appropriate.
- The Extended Phase 1 Map (Preliminary Ecological Appraisal (PEA). 12 December 2025. Ellendale Environmental. Version. CIC v1.0) records ‘ephemeral short perennial’ within the baseline habitats, The Statutory Biodiversity Metric (15 December 2025. V1.0) does not include this baseline habitat. To ensure accuracy and compliance, the baseline habitat types recorded within the statutory biodiversity metric and any accompanying habitat maps/documentation must align and, where necessary, amended to reflect the habitats actually present on site.
- The habitat maps and condition assessment sheets for the baseline habitats have not been submitted. This information is a minimum requirement set out in Article 7 of The Town and Country Planning (Development Management Procedure) (England) Order 2015 and must therefore be submitted for review by the ecology team prior to determination.

The current information must therefore be reassessed and submitted for review by the ecology team prior to determination of the application.

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).

While it is not expected that this development will result in significant loss of habitat, both CP50 and NPPF requires the inclusion of biodiversity enhancements, such as bird and bat boxes. Ecological enhancements are provided through the installation of bird and bat boxes, within the Preliminary Ecological Appraisal. The location of ecological/biodiversity enhancements must be included in the site plan drawings and will become an enforceable part of the planning permission. Bird/bat boxes will continue to be available for bats/birds for the lifetime of the development. Please see condition below.

Insufficient information has been submitted. 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

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

1. Compliance with submitted documents

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

- TBC

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 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.

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 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.

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

Ecologist	Date