

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	04/03/2026
Application number:	PL/2025/09917
Proposal:	Outline permission for the erection of up to 2 self-build dwellings and associated infrastructure, all matters are reserved except for access.
Site address:	Land to the east of New Road, Melksham, SN12 7QZ
Case officer:	Lucie Turner

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)
a)	No net loss of local biodiversity resource and ecological networks	CP50, NPPS	04/03/2026 Ecological Parameters Plan	
b)	Great Crested Newts - DLL	Conservation of Habitats and Species Regulations 2017; Wiltshire CP50; NPPF	04/03/2026 The Impact Assessment Conservation Payment Certificate, signed and countersigned.	

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, 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:

- Preliminary Ecological Appraisal, Arbtech, December 2025
- Illustrative Site Layout, Mark Doodes Planning, December 2025

- Design & Access Statement, Mark Doodes Planning, January 2026

The site comprises a field containing tussocky grassland, tall forbs and hedgerow. It is neighboured by an equestrian centre to the north, and further grassland to the south, east and west.

COMMENTS:

Ecological Parameters Plan

In line with NPPF and with CP50, applications must ensure that no net loss of functional habitat for the benefit of wildlife in the local area will occur as a result of the proposed development.

An Ecological Parameters Plan (EPP) is required. The EPP must clearly identify those areas of the site which are unconstrained, those areas where sensitive design or restrictions may be required, and any areas of the site which are to be retained, remain undeveloped, enhanced, form part of the landscaping for the purposes of protecting and enhancing biodiversity and any areas to be used as compensatory habitat in line with the submitted ecology documents, including the Biodiversity Net Gain Calculator spreadsheet. 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:

1. A scaled drawing showing existing ecological features, distinguishing between those to be retained and those which will be lost e.g. hedgerows, trees, etc.
2. Identify dark corridors that will be retained (given that the site is currently not illuminated)
3. Identify where new habitats will be created on site, include minimum area in hectares or length in metres and habitat type
4. 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

Protected species and habitats

Great Crested Newts (GCN)

Great Crested Newts are protected under Conservation of Habitats and Species Regulations 2017 (as amended) which implements the EC Directive 92/43/EEC in the United Kingdom, and the Wildlife and Countryside Act 1981 (as amended).

The site contains some suitable habitats for GCN during their terrestrial phase, and there are four known ponds (and multiple ditches) within 400m of the site, the nearest being a drainage ditch 5m away, and pond 60m away. Using Natural England's Rapid Risk Assessment Tool, and assuming presence of GCN in the closest pond, the risk was identified as "amber: offence likely".

The applicant intends to apply to Natural England to license this proposal under the Great Crested Newt District Licensing Scheme. Once the scheme is accepted under the District Level Licensing Scheme for Great Crested Newts, the Impact Assessment and Conservation Payment Certificate (IACPC), which must be signed by the applicant and countersigned by Natural England, must be submitted to the LPA. Please note, 'Annex 3: Site Location' must also be submitted with the IACPC and correspond with the red line site boundary submitted with the planning application.

A "provisional" IACPC has been submitted, but it has not been completed, signed and countersigned. The government guidance for LPAs ([Great crested newts: district level licensing for local planning authorities - GOV.UK](#)) and also developers ([Developers: how to join the great crested newt district level licensing scheme - GOV.UK](#)) states that a copy of the countersigned

IACPC must be submitted with the planning application. A copy of the IACPC is therefore required to be submitted to the LPA prior to determination of this application.

Bats

The site likely provides some foraging and commuting habitats for bats, though the trees on-site were not considered to offer any roosting opportunities. The majority of hedgerow will be retained, though grassland, ditch and tall forbs will be removed. It is not clear what extent of the drainage ditches will be lost, and no mitigation/enhancement area is shown on the plans. The EPP (as above) should clearly identify areas of habitat retention and improvement that will mitigate for the loss of potential bat habitat. It is also advised that any new lighting scheme (including that submitted at the reserved matters stage) is designed to be wildlife-sensitive, and 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 GN08-18 "Bats and artificial lighting in the UK", issued by the Bat Conservation Trust and Institution of Lighting Professionals.

Other

No badger setts or signs of badgers were observed within or close to the site, though the site and surrounding habitats may be suitable. The applicant is advised to seek advice from an independent ecologist should badgers become present on site prior to or during the construction works.

A Construction Method Statement (CMS) will be required to ensure that sensitive habitats, such as the surrounding hedgerow and ditch (if any is retained), as well as GCN (if present) are not adversely affected during the works. The CMS should also include precautionary measures for nesting birds and badgers. This should be secured via a planning condition.

Gains for biodiversity, relevant to local habitats and wildlife populations, should form part of the proposed development, in accordance with planning policy. Therefore, specific ecological enhancements such as bat roosting or bird nesting opportunities, and refugia suitable for GCN, should be secured via a condition (or secured at the reserved matters stage).

Biodiversity Net Gain

From 12 February 2024 Biodiversity Net Gain (BNG) became mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Based on the information available the biodiversity gain planning condition is not considered to apply to this application as it is for self and Custom Build Development, meaning development which:

- consists of no more than 9 dwellings;
- is carried out on a site which has an area no larger than 0.5 hectares; and
- consists exclusively of dwellings which are self-build or custom housebuilding (as defined in section 1(A1) of the Self-build and Custom Housebuilding Act 2015).

Note to case officer: you should be satisfied that the proposals meet the above criteria and act accordingly. Further information will be required from the applicant prior to determination in the event the application is considered to be subject to mandatory biodiversity net gain.

IN SUMMARY: 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 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:

1. Compliance with submitted documents

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

- Section 6 of the Preliminary Ecological Appraisal, Seasons Ecology, July 2025
- GCN DLL information
- Ecological Parameters Plan

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 reference to the surrounding hedgerow, as well as great crested newts, bats, badgers and nesting birds. 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. Ecological enhancements

Prior to the commencement of any works, including vegetation removal and demolition, details of the number, design and locations of ecological enhancements – such as opportunities for amphibians, bats and nesting 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.

Informative – Artificial Lighting

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 GN08-18 "Bats and artificial lighting in the UK", issued by the Bat Conservation Trust and Institution of Lighting Professionals.

Informative – DLL for GCN (provided the relevant certificate is supplied)

The scheme will be operating under a District Level Licence (DLL) for Great Crested Newts. Great Crested Newts are protected under Conservation of Habitats and Species Regulations 2017 (as amended) which implements the EC Directive 92/43/EEC in the United Kingdom, and the Wildlife and Countryside Act 1981 (as amended). Planning permission for development does not provide a defence against prosecution under this legislation.

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

Ecologist	Date
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