

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jessica Cracknell
Date:	11/03/2026
Application Number:	PL/2026/00367
Proposal:	Outline planning application (with all matters reserved except for access) for up to 200 residential dwellings (Use Class C3), provision of public open space, and associated infrastructure
Site Address:	Land East of Calne Road, Lyneham
Case Officer:	Adrian Smith

Recommendations:

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

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date submitted)
1	Great Crested Newts (GCN)	Habitat Regulations, CP50, NPPF	11/03/2026 GCN Rapid Risk Assessment and supporting surveys, GCN DLL IACPC, or mitigation strategy where required	NO
2	Ecological Enhancements	CP50, NPPF	11/03/2026 Enhancement measures suggested in ecological impact assessment to be shown on site drawings/plans including bat and bird box locations.	NO
3	Biodiversity Net Gain (BNG)	Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021)	11/03/2026 Submission of statutory metric calculation with the correct baseline habitats, and associated plans and condition assessment sheets.	NO
4	Ecological Parameters Plan (EPP)	NPPF, CP50	11/03/2026 Provision of a suitably detailed Ecological Parameters Plan (EPP).	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:

- Ecological Impact Assessment. 18 December 2025. RSK. Doc Ref. 2489428-D04 (00);
- The Statutory Biodiversity Metric. 19 December 2025. REV00;
- Biodiversity Net Gain Design Stage Report. 19 December 2025. RSK. Doc Ref. 2489428-D03(01);
- Arboricultural Impact Assessment. December 2025. RSK ADAS Limited. Ref. 1053402 Rev A;
- Illustrative Masterplan. 27 November 2025. TAG Design Associates. Project No. TD.00.160. Drawing No. 1001 A;
- Parameters Plan. 27 November 2025. Tag Design Associates. Project No. TD.00.160. Drawing No. PP-01C;
- Lighting Impact Assessment. 05 December 2025. Nature Positive. Project No. 3040956R01;
- Design & Access Statement. TAG Design Associates. Project Ref. TD.160;
- Planning Statement. December 2025. Twenty5.

The proposed site does not lie within or adjacent to any sites designated for conservation and there are no areas of significant ecological importance within a zone of influence, it is expected that any adverse impacts on protected species or habitats could be suitably mitigated through an appropriate design scheme and timing of works.

Bat Species

A number of trees within the site have been assessed for bat roosting features; however, no trees are currently proposed for removal. Should the proposals change such that trees with potential roosting features are affected, further survey work would be required and mitigation measures would need to be reviewed and updated accordingly. The site provides suitable bat foraging and commuting habitat, primarily associated with boundary hedgerows, scrub and trees. The majority of activity recorded was from common pipistrelle, with additional records of soprano pipistrelle, lesser horseshoe, brown long-eared, Myotis species, noctule, Nathusius' pipistrelle, greater horseshoe and Bechstein's bat. These records indicate that the site is of district value for bats. Subject to the retention of key boundary features and the implementation of an appropriate lighting strategy, it is considered likely that the functionality of habitats within the site, and their availability for foraging and commuting bats, will not be adversely affected.

The proposals include the removal of approximately 30 m of native hedgerow with trees along the western boundary of the site. The removal of hedgerows or creation of gaps within these features has the potential to reduce landscape connectivity for commuting bats. The application proposes mitigation measures including the retention of the majority of existing trees and hedgerows, together with additional tree planting, hedgerow planting and enhanced grassland habitats. An 8m wide 'dark corridor' is proposed around all development boundaries. Whilst the hedgerows are largely retained dark buffers are not specified (m) on the plans therefore the application does not demonstrate that they will be adequately buffered from the development to ensure functionality will be maintained.

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. 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.

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). The Ecological Impact Assessment recommends the inclusion of bat and bird boxes, log piles and hibernacula. The inclusion of integrated bat roosting and bird nesting boxes on the proposed dwellings will be expected. This should comprise integral features on new residential developments at the ratio of 1:1 feature to building. Locations should be chosen in consultation with a professional ecologist to ensure they are appropriately positioned, and the following details must be provided: location, number, type (include make/model, if appropriate) and positioning (height, aspect, surrounding habitat, as applicable). The locations of these features must be provided on site plan/elevation drawings and will become an enforceable part of the planning permission. Bird/bat boxes will continue to be available for birds/bats for the lifetime of the development.

Nesting Birds

The adults, young, eggs and nests of all species of birds are protected by the Wildlife and Countryside Act 1981 (as amended) while they are breeding. Please be advised that works should not take place that will harm nesting birds from March to August inclusive. 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.

Great Crested Newts (GCN)

A pond lies 30m east of the southern utilities connection corridor. Habitats within this development proposal provide some terrestrial habitat suitable to support GCN and although the pond won't be directly impacted by the scheme, impacts to GCN cannot be ruled out. We would advise that the Natural England rapid risk assessment for impacts on newts is undertaken and where an impact is predicted, the applicant may wish to consider District Level Licensing (DLL). Instead of carrying out site-specific mitigation and compensation, the applicant can apply to Natural England to determine whether the scheme is eligible for DLL. 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 is 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.

Reptiles

The majority of hedgerows, and suitable reptile habitats will be retained as part of the proposed development and will be protected during construction. A precautionary method of working must be undertaken including a sensitive (phased) vegetation clearance methodology between the months of April and October, carried out under the supervision of a suitably qualified ecologist. Reasonable avoidance measures should be included within a construction environment management plan (CEMP) which can be secured by condition.

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 December 2025. REV00) 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 tabs is accepted as accurate based on the information submitted. The pre-development (baseline) situation is summarised below.

On-site pre-development	20.03 Habitat units
(baseline) biodiversity value	1.27 Hedgerow units

	0.07 Watercourse units
Are there any irreplaceable habitats on-site?	No
Has any habitat degradation of occurred?	No

The condition assessment sheets for *all* the baseline habitats have not been submitted, including 'other neutral grassland', 'modified grassland' in 'good' condition, and the 'rural trees'. 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.

Ecological Parameters Plan (EPP)

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, water features, badger setts etc
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
6. Provide stand-off distances to the footprint of development e.g. curtilage to properties, car parks, roads for each tree to be retained, sufficient to ensure the tree will survive throughout the operational phase without risk of it being removed for health and safety, loss of amenity or liability reasons.
7. Provide cross-sectional drawing to show profile of SuDs, ponds or wetland features to demonstrate there is adequate room for these features to have gently profiled sides and thereby maximise their biodiversity potential.

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.

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

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

Ecologist	Date