

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	26/03/2026, 02/04/2026
Application number:	PL/2026/00879
Proposal:	Demolition of existing outbuilding and erection of two no.2 bedroom houses and associated works.
Site address:	Sir Audley Arms, Audley Road, Chippenham, SN14 0DY
Case officer:	Jonathan James

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)
	Protected species	CP50	26/03/2026 -Results of bat survey of outbuilding -Mitigation informed by said results (plan showing locations and specifications of bat roosting features)	YES
	BNG	Environment Act 2021	26/03/2026 -Clarification of potential exemption (i.e., extent and type of habitat that is/was present) -Clarification of whether degradation has occurred -If required, a metric and map	YES

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, 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, Ian Sullivan Architecture Ltd, February 2026
- Existing Site Plan, Ian Sullivan Architecture Ltd, January 2026

- Proposed Site Plan, Ian Sullivan Architecture Ltd, January 2026, [Revision A](#)
- Proposed Units 1-2, Ian Sullivan Architecture Ltd, January 2026, [Revision A](#)
- Further Bat Survey, Kingdom Ecology, May 2024

The site comprises a plot of land to the north of a former detached pub. The site contains hardstanding, and rubble/building waste likely associated with the adjacent development. It formerly contained an outbuilding, but this appears to have been removed. It is proposed to construct two semi-detached houses. The main pub building has approval for conversion to apartments (PL/2024/11526).

Thank you for re-consulting Ecology; my further comments are shown in blue.

Following the submission of my initial consultation response, I reviewed the DoC of the Biodiversity Enhancement condition associated with PL/2023/08639, under which approval was granted for the demolition of the outbuilding and replacement with a dwelling. I updated the case officer with further comments on 27/03/2026, stating:

“At the DoC, it was agreed that two integrated bat boxes and two integrated swift bricks/boxes would be installed on the new dwelling (at the current site). Further, the approved plans included the provision of native-species hedgerow planting along the northern and eastern boundaries, as well as a field maple and wild cherry tree at the eastern boundary.

The currently proposed site plan (3277 drawing no. 120, Ian Sullivan Architecture Ltd) shows one integrated bat access panel/brick and two swift bricks, as well as two bee bricks. The elevation plan (3277 drawing no. 125, Ian Sullivan Architecture Ltd) clarifies the specifications and positioning of these features. I am satisfied that that suitable enhancements for bats and birds can be provided, and compliance with the enhancements shown on the elevation plan should be secured via condition.

However, I note that the site plan omits the previously-approved hedgerow planting along the northern boundary, and, whilst two trees are shown, these are labelled as “indicative”, with no species noted. If the agent is able to incorporate the northern hedgerow back into the scheme please, and confirm details of the proposed tree plantings, that would be preferable.

Biodiversity Net Gain

Since the works that involved the removal of the outbuilding (and potentially the removal of any scrub surrounding) were approved under a minor application for planning permission made before 2 April 2024 (PL/2023/08639), this aspect of the works is arguably exempt from BNG. Considering the remainder of the site (i.e., hardstanding), the development would not impact an onsite priority habitat, nor any habitat that has biodiversity value greater than zero, thereby meeting the de minimis exemption. I am satisfied that the biodiversity gain planning condition is not considered to apply to this application.”

Following this, additional documents have been provided. My subsequent comments are incorporated below.

COMMENTS:

Protected wildlife

No ecological survey has been submitted with this application. The ecology report submitted with PL/2024/11526 states, in section 1.1, “*a follow on bat emergence survey of an adjacent outbuilding [was] completed on the 4th May 2024*”. It is possible that this refers to the former outbuilding within the present site, particularly given that streetview imagery shows that this building may have had some bat roosting features (missing roof tiles and gaps under tiles). If the applicant has access to this previous survey information, and/or any other survey data regarding the current site prior to demolition, please could this be provided?

Bats are European Protected Species afforded protection under the Conservation of Habitats and Species Regulations 2017 (as amended) and as such is a material consideration within the planning consultation process. Sufficient and appropriate mitigation measures to ensure that protected species are not adversely affected as a result of the proposed development must be submitted as part of the proposal. At present, as the bat roosting potential of the former building has not been made clear, the required mitigation/compensation is not clear.

Thank you for providing the relevant bat survey report, which clarifies that the building had been assessed as having “low” bat roosting potential in September 2023. Following that, the emergence survey recorded no roosting bats, and it was concluded that the building was not likely to host a bat roost. Therefore, specific mitigation was not required.

Given the remaining habitats present (primarily hardstanding) and surrounding landscape (urban) and records, it is considered unlikely that the works will adversely impact other protected wildlife. In line with NPPF and with CP50, gains for biodiversity, relevant to local habitats and wildlife populations, should form part of the proposed development. Further to the above information being provided, biodiversity enhancements should be secured via condition.

As outlined in my email comments above, the proposed integrated bat access panel, bee bricks, swift nesting bricks and mammal fence gap are considered to provide appropriate enhancements for wildlife. Additionally, further to my email comments, a revised plan has been submitted that shows the addition of hedgerow along the northern boundary. This addition is welcomed and aligns with that previously approved under PL/2023/08639. These enhancements should be secured via a compliance condition.

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). The applicant is seeking to apply the de minimis exemption, whereby development does not impact an onsite priority habitat AND impacts less than 25 square metres of onsite habitat that has biodiversity value greater than zero (and less than 5 metres in length of onsite linear habitat). The submitted existing site plan shows an area of vegetation beside the former outbuilding, at the northern boundary. This is also shown in recent aerial imagery.

It is therefore not clear whether the application is below the de minimis threshold – the applicant should provide further information to clarify that the development is below the threshold and is not subject to the biodiversity gain condition. In this case, this should include confirmation of the type and extent (in sq m) of habitat that will be lost (or that has been lost, already). Please note that Paragraph 6 of Schedule 7A of the Town and Country Planning Act 1990 makes clear that for any unauthorised works undertaken after the 30 January 2020, the current pre-development biodiversity value of the onsite habitat is to be taken as its biodiversity value immediately before

the carrying out of such works. This means that the current baseline value must be taken as the baseline value that existed prior to the commencement of vegetation clearance, if any has occurred.

Please see [Biodiversity net gain - GOV.UK](https://www.gov.uk/biodiversity-net-gain) for full details about BNG as well as its exemptions.

It is noted that the BNG proposed for the adjacent site (the main pub building) does not cross into/conflict with the current redline boundary.

As explained above (in blue), I am satisfied that the biodiversity gain planning condition is not considered to apply to this application.

CONDITIONS:

1. Compliance with submitted documents

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

- Biodiversity enhancements and hedgerow shown on 'Proposed Site Plan, Ian Sullivan Architecture Ltd, January 2026, Revision A'
- Biodiversity enhancements shown on Proposed Units 1-2, Ian Sullivan Architecture Ltd, January 2026, Revision A

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

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

Ecologist	Date
Abi Gazzard	02/04/2026