

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jessica Cracknell
Date:	07/04/2026
Application Number:	PL/2026/01527
Proposal:	Permission in Principle for the construction of 2 dwellings
Site Address:	Land at Upper Castle Combe, Chippenham, SN14 7HA
Case Officer:	Isobella Wise

Recommendations:

☒	Objection: Further information required HRA required
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Insufficient information has so far been submitted to enable the Appropriate Assessment to be undertaken in respect of the Bath and Bradford-on-Avon Bats SAC, which must be concluded favourably and the conclusion agreed with Natural England prior to the application being determined.

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date submitted)
1	Bath and Bradford on Avon Bat Special Area of Conservation (SAC): Habitat Regulations Assessment (HRA)	Habitat Regulations, NPPF, Wiltshire CP50	07/04/2026 Insufficient information submitted for Appropriate Assessment (surveys and mitigation)	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:

- Site Plan. February 2026. Willis & Co. Darwing No. H-JH-02;
- Location Plan. February 2026. Willis & Co. Drawing No. H-JH-01.

No plans or ecological information, further to a location plan, have been submitted. This application seeks permission in principle to construction 2 dwellings.

Bath and Bradford on Avon Bats Special Area of Conservation (SAC)

The application site is within a consultation zone for Lesser Horseshoe bats associated with the Bath and Bradford on Avon Bats Special Area of Conservation (SAC) and therefore has potential to result in significant

adverse impact on the special features of that site. Appropriate Assessment (AA) under Section 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) must be carried out by the relevant Competent Authority (the LPA) to determine the potential significant effects and the suitability of any measures proposed to avoid or mitigate those effects.

The site is linked to grassland and woodland in the wider landscape, potentially providing important foraging and commuting habitats. There are a number of records of Lesser Horseshoe bats approximately 340m north of the site. Based on the information provided, the current proposal could result in the loss of foraging/commuting habitat as well as disturbances during construction and post-development, via, e.g., new lighting or noise, vibration and dust pollution. It is not known whether any trees are proposed for removal.

For projects that could impact a European habitats site, a habitats regulations assessment (HRA) must be carried out to determine the potential significant effects and the suitability of any measures proposed to avoid or mitigate those effects.

Insufficient information has so far been submitted to enable the Appropriate Assessment to be undertaken, which must be completed and the conclusion agreed with Natural England prior to the application being determined. Such information should include detailed surveys demonstrating how bats currently use the site, including for roosting, foraging and commuting, as well as a clear statement of any vegetation proposed for removal, and proposed mitigation, e.g., by alternative or supplementary planting. Any commuting/foraging habitat should be buffered sufficiently to ensure functionality is maintained.

Paragraph 1A of regulation 70 of the Conservation of Habitats and Species Regulations 2017 states that the assessment provisions apply to “*granting permission in principle under section 59A of the TCPA 1990 (Development orders: permission in principle)*”. This makes it clear that the LPA must make an Appropriate Assessment (AA) of the implications of the Proposal before any Permission in Principle is authorised. Further information can be found within the [Government's guidance for applications for permission in principle](#).

The site supports habitat or features functionally linked to and suitable for the qualifying features of the SAC and these features could be impacted by the development. Conditions to ensure no adverse impacts on these features and therefore the Habitats Site can't be imposed for this type of application. In the absence of mitigation potential for adverse effects can't be ruled out and the LPA is unable to conclude the AA favourably.

Protected species and habitats

The site and surrounding area may be suitable for use by bats, badgers, nesting birds, hedgehogs, and reptiles. Ancient Woodland Parsonage Wood lies approximately 400m west of the site.

Core Policy 50 of the Wiltshire Core Strategy requires all development to demonstrate:

- i. No net loss of local biodiversity resource and
- ii. Secure the integrity of local ecological networks

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. In addition, it is expected that gains for biodiversity, relevant to local habitats and wildlife populations will form part of the proposed development.

The scope of permission in principle is generally limited to location, land use and amount of development. At the technical details consent stage, evidence to demonstrate that there will be no net loss of local biodiversity resource, and that the integrity of ecological networks will be maintained, must be submitted for review by the LPA's ecology team. Ecological information submitted at that stage should consider the presence of protected and Priority species and habitats, and any relevant mitigation as well as enhancements.

Biodiversity Net Gain

The grant of permission in principle is not a grant of planning permission, and so the mandatory biodiversity gain requirement does not apply at this stage. The subsequent technical details consent may be subject to

the biodiversity gain condition. Please note that applications subject to the biodiversity gain condition must be accompanied by minimum information set out in [Article 7 of The Town and Country Planning \(Development Management Procedure\) \(England\) Order 2015](#), which includes:

- [the completed metric calculation tool](#) showing the calculations of the pre-development biodiversity value of the onsite habitat on the date of application (or proposed earlier date) including the publication date of the biodiversity metric used to calculate that value;
- a description of any [irreplaceable habitat](#) (as set out in [column 1 of the Schedule to the Biodiversity Gain Requirements \(Irreplaceable Habitat\) Regulations 2024](#)) on the land to which the application relates, that exists on the date of application, (or an earlier date); and
- plan(s), drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application (or earlier proposed date), including any irreplaceable habitat (if applicable).

Note: this is a summary, please refer to Paragraph: 011 [Biodiversity net gain - GOV.UK](#) for full details.

If the applicant considers that the development would not be subject to the biodiversity gain condition, Schedule 7A of the Town and Country Planning Act 1990 the applicant must provide a statement as part of the planning application setting out the reasons why they believe this is the case. Submission of a completed metric calculation tool may be necessary to evidence the statement.

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

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

Ecologist	Date