

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jessica Cracknell (Ecologist)
Date:	23/09/2025 29/12/2025 28/04/2026 updated comments
Application number:	PL/2025/05943
Proposal:	Residential development for up to 20 dwellings, associated works including infrastructure, ancillary facilities and landscaping. Construction of a new vehicular access off Spitfire Road.
Site address:	Land East of Spitfire Road, Calne
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)
1	Enhancements and Mitigation	NPPF, CP50	23/09/2025 Enhancement measures suggested in ecological impact assessment to be shown on site drawings/plans.	YES 29/12/2025 Technical Note: Ecology Response – November 2025. 04 November 2025. Ecology Solutions Ltd. 12642.TechnicalNote.Oct25.vf1.
2	Ecological Parameters Plan (EPP)	NPPF, CP50	23/09/2025 An EPP To be submitted in support of the Outline application and adhered to at REM.	YES 29/12/2025 Technical Note: Ecology Response – November 2025. 04 November 2025. Ecology Solutions Ltd. 12642.TechnicalNote.Oct25.vf1.
	Biodiversity Net Gain (BNG)	Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021)	29/12/2025 Submission of statutory metric calculation with the correct baseline habitat maps and condition assessments: Address issues in the baseline (see main text)	YES 28/04/2026 - Technical Note: Ecology Response – January 2026. 09 January 2026. Ecology Solutions Ltd. 12642.TechnicalNote.jan26.vf1; - Ecological Impact Assessment & Biodiversity Net Gain. 22 May 2025. Ecology Solutions;

				• The Statutory Biodiversity Metric. 04 November 2025. Ecology Solutions.
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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 and aerial photography of the site and surrounding area, together with GIS layers of statutory and non-statutory sites and existing records of protected species.

The following submitted documentation was reviewed to inform this response:

- Technical Note: Ecology Response – January 2026. 09 January 2026. Ecology Solutions Ltd. 12642.TechnicalNote.jan26.vf1;
- Technical Note: Ecology Response – November 2025. 04 November 2025. Ecology Solutions Ltd. 12642.TechnicalNote.Oct25.vf1;
- Ecological Impact Assessment & Biodiversity Net Gain. 22 May 2025. Ecology Solutions;
- The Statutory Biodiversity Metric. 04 November 2025. Ecology Solutions;
- Arboricultural Survey, Impact Assessment and Protection Plan. 27 June 2025. MBP Arboriculture. Version. V4;
- Illustrative Masterplan. 16 October 2025. Robert Hitchins. Drawing No. 381.UD.01. Rev. M;
- Design & Access Statement. July 2025. Robert Hitchins. Rev. B;
- Design & Access Statement Addendum. October 2025. Robert Hitchins. Rev. A;
- Planning Statement. 01 July 2025. Pegasus Group. Ref. P23-2672.

The mitigation and enhancements outlined in the submitted Ecological Assessment must be clearly incorporated into an Ecological Parameters Plan (EPP), and subsequent plans at Reserved Matters stage. Key measures include but are not limited to:

- Creation of species-rich grassland using native seed mixes
- New and enhanced scrub and hedgerow planting using native species to ensure long-term ecological functionality.
- Retention and protection of all hedgerows and trees during construction, with protective fencing at canopy width.
- Setback of the proposed outfall to reduce stream bank impacts, with immediate planting of aquatic and marginal vegetation around the headwall and wet ditch to stabilise banks and provide new aquatic habitat.

~~The retention of existing hedgerows and trees is welcomed; however, the proposed layout severs the northern commuting corridor. Replacement planting, such as large specimen trees as recommended in the Ecological Assessment, must be shown on the submitted plans to ensure ecological connectivity is maintained. To align with the Wiltshire Green Blue Infrastructure (GBI) Strategy we request the northern boundary of the site is reviewed to ensure the significant corridor is continued throughout the development.~~

A detailed Ecological Parameters Plan has now been submitted and is welcomed. The plan identifies the key ecological features to be retained, buffered and enhanced. The submitted EPP will become an approved document of any outline permission, and all Reserved Matters applications must be in full accordance with it. Any subsequent revisions must clearly demonstrate compliance with the EPP, including habitat retention, creation and enhancement areas, buffer distances, lighting constraints and long-term management.

The proposed development must ensure full compliance and alignment with the approved Ecological Parameters Plan (December 2023. Ecology Solutions Ltd. 10185: Land Off Spitfire Road, Calne. Rev. C) and Ecological Assessment (September 2022. Ecology Solutions Ltd. 10185.EcoAss.vf2) associated with the consented scheme (planning ref: PL/2022/07893 and appeal ref: APP/Y3940/W/24/3351528) immediately north of the site.

Reptiles

Reptile surveys undertaken within the adjacent site between April and May 2022, confirmed the presence of Slow Worm and Grass Snake. Given the similarity of habitats, it is considered likely that reptiles are also utilising the application site. Reasonable avoidance measures should be included within a Construction Environment Management Plan (CEMP) which can be secured by condition.

Badgers

Any identified badger setts must be retained within the development proposals wherever possible, with a minimum 30m buffer from built form or construction activities. Where retention is not feasible, any active setts impacted by the scheme must be closed under a Natural England licence, following best practice protocols. Given the potential for new badger setts to be established, an updated badger survey should be undertaken no more than six months prior to the commencement of development. Should the status of badgers on the site have changed, the mitigation measures will need to be revised accordingly.

Water Voles/Otters

Surveys undertaken along Abberd Brook in March 2025 recorded no direct evidence of Otter or Water Vole within the section adjacent to the Application Site. However, records confirm both species are present within the wider area. The watercourse itself was assessed as offering suitable habitat for dispersal and foraging. The proposed development includes installation of a headwall to discharge surface water into the brook, which could result in indirect impacts through siltation, runoff or localised bank loss. Mitigation measures set out in the ecological impact assessment are supported and should be included within a Construction Environment Management Plan (CEMP) which can be secured by condition.

Bat Species

The Site is assessed to offer moderate suitability for foraging and commuting bats in the form of hedgerows, scrub, grassland, scattered trees and an adjacent watercourse, Abberd Brook. Higher quality habitats are present in the surrounding area making it more likely species will use on-site habitats, connecting to the wider landscape. Four bat commuting and foraging corridors were identified. The eastern, southern, and western will be retained, while the northern corridor will be intersected by the proposed new access road, resulting in a partial loss of hedgerow. All identified key commuting and foraging routes must be retained, buffered and shown in the provided Ecological Parameters Plan, with replacement planting for lost sections of hedgerow to restore connectivity.

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 GN08/23 "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.

~~Whilst the hedgerows are largely retained dark buffers are not specified (m) on the plans or reports therefore the application does not demonstrate that they will be adequately buffered from the development to ensure functionality will be maintained. To ensure ecological functionality for foraging and commuting bats is retained it is expected that an undeveloped continuous dark corridor is provided along key bat habitat.~~

The submitted Technical Note: Ecology Response – November 2025 identifies that a section of the northern hedgerow will be lost to facilitate the proposed site access and, due to the narrow nature of the site, it is not feasible to retain all bat foraging and commuting corridors in their original condition. However, provision has been made to mitigate this impact through replacement tree planting either side of the new access road, as shown on the Illustrative Masterplan. This planting is intended to maintain ecological connectivity and to ensure continued east–west movement through the site.

Nesting Birds

The scrub and hedgerows across the site provide suitable nesting habitat for a range of bird species. Where possible, habitat removal must 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 will be conducted no more than 48 hours before clearance.

Compliance with 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). *It is currently expected that all new developments will provide the ratio of 1:1 feature to building in line with BS 42021:2022 Integral nest boxes – Selection and installation for new developments.* Integrated features are generally maintenance-free and seek to benefit a target species/s or group/s and should demonstrate viability in terms of position on the building, location and clustering in accordance with relevant guidance and the additional features.

Ecological enhancements within Section 10.3 of the Ecological Impact Assessment and Biodiversity Net Gain report are provided through the installation of log piles, five bat and bird boxes. The location of the bat and bird boxes *have been provided within the Species Enhancement Plan. November 2025. Ecology Solutions Ltd. 12642. Rev. B (Technical Note: Ecology Response – November 2025. 04 November 2025. Ecology Solutions Ltd. 12642. TechnicalNote.Oct25.vf1)* will be secured by condition and will become an enforceable part of the planning permission.

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 (23 May 2025. Ecology Solutions) confirming the baseline and predicted post- development biodiversity units of the site has been submitted (including the condition assessment sheets and maps).

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

- ~~• The updated statutory metric calculation (04 November 2025. Ecology Solutions) shows a baseline area habitat value of 2.88 units, this is higher than the 2.70 area habitat units in the previous statutory metric calculation (23 May 2025. Ecology Solutions) originally submitted with the application. The baseline habitat value should not have changed since the application was submitted and justification for the new value is required.~~

~~Where the statutory biodiversity metric has been updated, the baseline habitat map must also be updated to reflect any changes. All submitted documentation must align with the same recorded baseline habitat area reflected across all documentation.~~

~~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.~~

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 (baseline) biodiversity value	2.88 Habitat units
	0.93 Hedgerow units
	1.44 Watercourse units
Are there any irreplaceable habitats on-site?	No
Has any habitat degradation of occurred?	No

The proposed BNG is considered 'significant' due to:

- the scale and nature of the application (major);
- units required (3.17 area habitat units, 1.02 hedgerow units and 1.59 watercourse units), and
- the BNG proposed (including medium distinctiveness habitats of other neutral grassland, urban tree, mixed scrub and ditches).

A Habitat Management and Monitoring Plan (HMMP) will be required and should be secured via condition.

In order for the council to fulfil its BNG monitoring responsibilities, a Biodiversity Net Gain On-site 30-year Monitoring Fee must be secured through a Section 111, Section 106 or Unilateral Undertaking at the time of permission with contributions secured prior to commencement. The applicant should be directed to the Guidance Note for Completing Agreements Under S.111 of the Local Government Act 1972. Where the applicant elects to use the S111 process the fee must be paid and S111 signed by both the applicant and the council on the granting of planning permission.

In order for the council to fulfil its monitoring obligations, the BNG monitoring fee would be £11,165 plus legal fees payable on commencement of development.

Local Nature Recovery Strategy (LNRS)

The Environment Act 2021 - Local nature recovery strategies (legislation.gov.uk) is a mechanism to deliver nature recovery at a local and regional scale. Your proposal could support the development of this strategy by creating habitat in line with the above guidance. For more information see- [Wiltshire and Swindon Local Nature Recovery Strategy - Wiltshire Council](#)

Ecological Parameters Plan (EPP)

An Ecological Parameters Plan (EPP) is required to ensure compliance with Core Policy 50, the NPPF and Policy NE4: Trees, Woodland and Hedgerows from Calne Community Neighbourhood Plan 2 2023-38.

~~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.~~

A detailed Ecological Parameters plan has been provided and is welcomed, which incorporates the mitigation and enhancement measures set out in the Ecological Impact Assessment. This includes the creation of species-rich grassland using native seed mixes, new and enhanced scrub and hedgerow planting with native species, and the retention and protection of existing hedgerows, subject to these measures being fully detailed and secured through the EPP and subsequent Reserved Matters submissions.

CONDITIONS:

1. Compliance with submitted documents

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

- Technical Note: Ecology Response – January 2026. 09 January 2026. Ecology Solutions Ltd. 12642.TechnicalNote.jan26.vf1;
- Technical Note: Ecology Response – November 2025. 04 November 2025. Ecology Solutions Ltd. 12642.TechnicalNote.Oct25.vf1;
- Sections 10, 11 and 12, Plans ECO1, ECO2, ECO3, ECO4, ECO5, and Appendices 3 and 4 of the Ecological Impact Assessment & Biodiversity Net Gain. 22 May 2025. Ecology Solutions;
- The Statutory Biodiversity Metric. 04 November 2025. Ecology Solutions;
- Arboricultural Survey, Impact Assessment and Protection Plan. 27 June 2025. MBP Arboriculture. Version. V4;

- Illustrative Masterplan. 16 October 2025. Robert Hitchins. Drawing No. 381.UD.01. Rev. M.

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

2. Construction Environment Management Plan (CEMP)

Prior to the commencement of works, including demolition, ground works/excavation, site clearance, vegetation clearance and boundary treatment works, a Construction Environmental Management Plan (CEMP) shall be submitted to the local planning authority for approval in writing. The Plan shall provide details of the avoidance, mitigation and protective measures to be implemented before and during the construction phase, including but not necessarily limited to, the following:

- a. Identification of ecological protection areas/buffer zones and tree root protection areas and details of physical means of protection, e.g. exclusion fencing.
- b. Working method statements for protected/priority species, such as nesting birds, bat species, water voles, otters, badgers and reptiles.
- c. Mitigation strategies already agreed with the local planning authority prior to determination, such as for water voles, otters, bat species and reptiles; this should comprise the pre-construction/construction related elements of strategies only.
- d. Work schedules for activities with specific timing requirements in order to avoid/reduce potential harm to ecological receptors; including details of when a licensed ecologist and/or ecological clerk of works (ECoW) shall be present on site.
- e. Key personnel, responsibilities and contact details (including Site Manager and ecologist/ECoW).

Development shall be carried out in strict accordance with the approved CEMP.

REASON: To ensure adequate protection and mitigation for ecological receptors prior to and during construction, and that works are undertaken in line with current best practice and industry standards and are supervised by a suitably licensed and competent professional ecological consultant where applicable.

3. Landscape and Ecological Management Plan (LEMP)

Prior to the start of construction, a Landscape and Ecology Management Plan (LEMP) shall be submitted to and approved in writing by the Local Planning Authority. The LEMP will include long term objectives and targets, management responsibilities and maintenance schedules for each ecological feature within the development, together with a mechanism for monitoring success of the management prescriptions, incorporating review and necessary adaptive management to attain targets.

The LEMP shall be implemented in full and for the lifetime of the development in accordance with the approved details.

REASON: To ensure the long-term management of landscape and ecological features retained and created by the development, for the benefit of visual amenity and biodiversity for the lifetime of the scheme.

4. Ecological Parameters Plan

At Reserved Matters, the design and layout of the site will be in accordance with the Ecological Parameters Plan [Appendix 3: Ecological Parameters Plan. Technical Note: Ecology Response –

November 2025. 04 November 2025. Ecology Solutions Ltd.
12642.TechnicalNote.Oct25.vf1] This document sets out the ecologically sensitive areas of the site that will be retained, protected and enhanced. It will not be altered at Reserved Matters without detailed justification based on additional habitat and wildlife species surveys.

REASON: To protect the ecologically sensitive features of the site.

5. 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.

6. Habitat Management and Monitoring Plan (HMMP)

No development shall commence on site until a Habitat Management and Monitoring Plan (the HMMP), prepared in accordance with the statutory Biodiversity Gain Plan and including:

1. a non-technical summary;
2. the roles and responsibilities of the people or organisation(s) delivering the HMMP;
3. the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the statutory Biodiversity Gain Plan and schedule for implementation;
4. the management measures to maintain habitat in accordance with the statutory Biodiversity Gain Plan for a period of 30 years from the completion of development; and
5. the monitoring methodology and specification of a Monitoring Pack (to include but not exclusively up to date Management Actions Logs, Habitat Condition Assessment Reports, metric calculation; and corresponding post intervention Habitat Map) which shall be submitted to the Local Planning Authority in years 2 (two) 5 (five) 10 (ten) 15 (fifteen) 20 (twenty) and 30 (thirty) of the Maintenance Period,

has been submitted to, and approved in writing by, the local planning authority.

No [*consider occupancy trigger e.g. more than 50% units/floor space shall be occupied*) until the habitat creation and enhancement works set out in the approved HMMP have been implemented.

The created and/or enhanced habitat shall be managed and maintained in accordance with the statutory HMMP at all times thereafter.

REASON: To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990.

INFORMATIVES:

Nesting Birds

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.

Reptiles

There is a residual risk that reptiles could occur on the application site. These species are legally protected and planning permission does not provide a defence against prosecution. In order to minimise the risk of these species occurring on the site, the developer is advised to clear vegetation during the winter, remove all waste arising from such clearance and maintain vegetation as short as possible in line with the recommendations made in (Ecological Impact Assessment & Biodiversity Net Gain. 22 May 2025. Ecology Solutions). If these species are found during the works, the applicant is advised to stop work and follow advice from an independent ecologist or the Council Landscape and Design Team (ecologyconsultations@wiltshire.gov.uk).

Final sign off – all matters addressed.

Ecologist Jessica Cracknell	Date 28/04/2026
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