

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	08/05/2026
Application number:	PL/2026/01963
Proposal:	Outline planning permission: All matters reserved for the residential development for up to 175 dwellings, associated works (including demolition), infrastructure, ancillary facilities, open space and landscaping. Construction of a new vehicular access off Coate Road and Windsor Drive.
Site address:	Land South of Coate Road, Devizes
Case officer:	Lucy Rutter-Dowd

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	Ecological Parameters Plan	Wiltshire CP50; NPPF	08/05/2026 Provision of an Ecological Parameters Plan (EPP)	
2	Phosphorus neutrality	Habitat Regs	08/05/2026 Completed nutrient calculator and mitigation	
3	Bats	Habitat Regs, Wiltshire CP50; NPPF	08/05/2026 -Emergence survey results and mitigation, as appropriate -Historical and current bat activity survey results, or clear justification as to why these have not been provided	
4	Badgers	Protection of Badgers Act 1992, Wiltshire CP50; NPPF	08/05/2026 -Survey results and mitigation, as appropriate	
5	Nesting birds	Wildlife and Countryside Act 1981, Wiltshire CP50; NPPF	08/05/2026 -Mitigation plan	
6	BNG	Environment Act 2021, Town and Country Planning Order 2015, CP50	08/05/2026 -Updated metric and map to include all habitats within redline boundary -Condition assessment sheet/s for trees	

			-Clarification of exclusion of watercourse units -Hedgerow units to be confirmed	
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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, 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:

- Planning Statement, Pegasus Group, February 2026
- Cover Letter, Robert Hitchins, March 2026
- Design & Access Statement, Robert Hitchins, February 2026
- Ecological Appraisal, Aspect Ecology, February 2026
- Biodiversity Net Gain Assessment, Aspect Ecology, February 2026
- Statutory Biodiversity Metric, Aspect Ecology, February 2026
- Tree Survey Report, MHP, December 2024
- Indicative Masterplan, Robert Hitchins, September 2025, Revision K
- Utility Statement, Robert Hitchins, February 2026

The site comprises two arable fields where it is proposed to create a development of up to 175 dwellings. This parcel of land comprises the southern section of a wider site that was included in applications for a larger residential development (2013/0083/OUT, plus resubmission 14/00309/OUT). The former application was ultimately dismissed at appeal, and the latter was withdrawn. The associated refusal did not include ecology-related reasons. Since then, the construction of up to 200 dwellings in the northern section of said wider site was allowed at appeal (PL/2021/04774). The current site comprises the southern fields.

A screening request was submitted to the Council on in November 2024, and it was confirmed that an EIA was not required for the current proposal.

COMMENTS:

Hampshire River Avon Special Area of Conservation (SAC) Catchment

This development falls within the catchment of the River Avon SAC and has potential to cause significant adverse effects alone or in combination with other developments through discharge of phosphorus in wastewater. 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.

Insufficient information has so far been submitted to enable the AA to be undertaken, which must be completed and the conclusion agreed with Natural England prior to the application being determined.

It is acknowledged that the ecology report states "*The proposed development would discharge to the River Avon (Bristol) catchment, so will have no risk of effects on the River Avon (Hampshire)*". However, the applicant has not provided details of which treatment works the wastewater would be discharged to.

The site appears to fall within the Upper Avon Western Arm catchment. If discharging within this catchment, a completed River Avon SAC nutrient neutrality calculator will be required. Applications must submit a completed calculation in an unlocked Excel file for the Council's ecologist to approve. The approved calculation is required to enable the AA to be undertaken, which must be completed, and the conclusion agreed with Natural England prior to the application being determined.

Guidance on completing the phosphorus budget is available on our website ([Phosphorus and nitrogen mitigation - Wiltshire Council](#)). This webpage also contains information on the options available for developments to achieve nutrient neutrality.

Ecological Parameters Plan

An Ecological Parameters Plan (EPP) is required to ensure required ecological features are integrated into the development. 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. 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
3. Identify where habitat creation and enhancement will be incorporated on-site, denoting habitat types and including SuDS

Protected species

Given the large size of the site and the protected species potentially present, a Construction Environmental Management Plan (CEMP) as well as Landscape Ecological Management Plan (LEMP) will be necessary to ensure the appropriate precautions and working methods are adhered to. This should be secured via a condition.

In line with NPPF and with CP50, gains for biodiversity, relevant to local habitats and wildlife populations, should form part of the proposed development. The ecology report's recommendations of bat and bird boxes, habitat piles and refugia, and bee bricks and insect boxes are welcomed. A condition should be added to ensure the provision and implementation of a plan showing ecological enhancements.

Please see my detailed comments on protected fauna below.

Bats – foraging and commuting

Many of the hedgerows bordering and bisecting the site are linked to good bat habitat (the canal to the north, as well as further connecting hedgerows to the south and east). The ecology report states that the arable fields are considered unlikely to support notable foraging activity.

A walkover survey in 2012, as well as static detector survey, recorded "low numbers" of foraging bats. The full results and methodology have not been provided. Further, no

update bat activity surveys have been undertaken for the current proposal. Justification for this has not been provided.

Bats – roosting

Building B2 was assessed as having low bat roosting suitability, and as such, further survey is required. Additionally, a mature oak tree was found to have some roosting potential, though it is understood that this tree will be retained.

Bats and their roosts are afforded stringent protection under the Conservation of Habitats and Species Regulations 2017 (as amended) and as such are a material consideration within the planning consultation process. Sufficient and appropriate mitigation measures to ensure that bats are not adversely affected as a result of the proposed development must be submitted as part of the proposal, and shown on development drawings, where bats are present, or likely to be present.

At present, insufficient information has been provided to for the council to determine the impact of the proposals on bats, and whether mitigation can be successfully accommodated within the development. Further information should include:

- The results of presence/absence surveys (and/or roost characterisation surveys, as appropriate) of any structures with low-high roost potential, in line with the Bat Conservation Trust's Bat Survey Guidelines
- The results of bat activity surveys
- A mitigation strategy, as necessary

Badgers

A badger survey has been undertaken, with the ecology report stating results are provided in an Appendix. This has not been submitted – please can this be provided?

Dormice

Whilst dormice surveys were not undertaken for the current application, there is a 2012 record of dormice in the eastern boundary hedgerow of Field 2 and, in the absence of more recent surveys, it is assumed that dormice remain present on-site. Small sections of scrub and hedgerow (~0.01ha and 30m, respectively) will be removed to accommodate access. A notable woodland area is proposed as the south of the site that will suitably compensate for this loss and improve dormouse habitat availability. Precautionary measures for dormice during construction should be detailed within a CEMP, and habitat improvements/management plan detailed within a LEMP.

The Hazel Dormouse is a European Protected Species afforded protection under the Conservation of Habitats and Species Regulations 2017 (as amended). The applicant is advised that a European Protected Species (EPS) dormice Mitigation Licence will need to be obtained for the lawful construction of this development.

Breeding birds

Breeding bird surveys were undertaken in April, May and June 2025, recording a total of 25 species. Six of the observed species – skylark, dunnock, starling, house sparrow, linnet and yellowhammer – are listed as a species of principal importance under Section 41 of the Natural Environment and Rural Communities Act 2006 (they are considered a Priority Species) and must be considered within the planning process. These species, and a further five that were recorded, are Red- or Amber-listed birds of conservation

concern. 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. Whilst no breeding pairs were noted, only three survey visits were undertaken and the possibility of breeding cannot be ruled out.

The ecology report's recommended mitigation for breeding birds consists of the avoidance of vegetation clearance during nesting season. No further mitigation is suggested, such as specific nest boxes (e.g., for starling), appropriate hedgerow management or the provision of open spaces (on- or off-site). The site is neighboured by a large, approved development to the north, resulting in significant cumulative pressure on open farmland habitats that are critical for ground-nesting species such as skylark. The current development must provide a clearly defined mitigation strategy; it may be appropriate to include suitable habitat provision for species such as skylark.

Other species

There are nearby records of otter and water vole. However, the site itself provides limited opportunities for these species. Precautionary measures must be implemented to ensure that the risk posed to these taxa and the habitats they use remains minimal; such measures should be detailed within a CEMP.

The arable land within the site is of negligible suitability for use by reptiles and amphibians, and the nearest pond is 175m east. The field margins and hedgerow may be of some value, but it is stated that these will largely be retained. The retention of these potentially valuable habitats must be clearly shown on an Ecological Parameters Plan, as above, and appropriate protective measures (e.g., sensitive site clearance) detailed within the CEMP.

County Wildlife Site (CWS)

The Kennet & Avon Canal, a local wildlife site, is adjacent to the site at the northwest (running under Windsor Drive) bordered by lowland mixed deciduous woodland Priority Habitat. Wiltshire Core Policy 50 requires that CWSs are protected from the effects of development and should be enhanced where possible. It states: "*Sustainable development will avoid direct and indirect impacts upon local sites through sensitive site location and layout, and by maintaining sufficient buffers and ecological connectivity with the wider environment.*" In line with the NPPF and with CP50, applications must also 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.

The ecology report identifies that the canal must be protected from pollution and light spill. Appropriate mitigation must be fully detailed within a Construction Environmental Management Plan (CEMP) to be submitted with any subsequent reserved matters application. Further, buffers and dark zones should be sufficiently set out in an Ecological Parameters Plan (as above).

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, condition assessments and map (*Biodiversity Net Gain Assessment, Aspect Ecology, February 2026; Statutory Biodiversity Metric, Aspect Ecology,*

February 2026) estimating the baseline and predicted post-development biodiversity units of the site have been submitted.

The pre-development (baseline) situation is summarised below.

On-site pre-development (baseline) biodiversity value	21.00 Habitat units
	5.67 Hedgerow units
	0.00 Watercourse units
Are there any irreplaceable habitats on-site?	No
Has any habitat degradation of occurred?	No

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

- Watercourse units have not been calculated, despite the site boundary crossing into the riparian zone of the canal to the northwest. Please could clarification be provided regarding the works proposed to the northwest (if any) and whether any development will encroach the riparian zone?
- The ecology report states in section 5.5.5 that 30m of hedgerow will be removed. However, the BNG metric appears to estimate a total loss of 10m.
- The condition assessment for the individual trees is missing
- The redline boundary used for the BNG assessment is different from the redline boundary shown on the location plan (the baseline habitats map in the BNG report shows areas on the boundaries as “excluded” from BNG assessment). The redline application boundary and site boundary used for the BNG assessment must match. The BNG metric, map and condition assessments must be updated as appropriate.

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 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: wording to be provided once above issues addressed.

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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