

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	12/05/2026
Application number:	PL/2026/01431
Proposal:	Southpoint Business Park (Plot 100) , A350 West Cepen Way / N4528, Chippenham, SN15 2NU
Site address:	Erection of health, fitness and racquets club, including three outdoor tennis courts within an enclosed air dome structure, three outdoor padel courts enclosed within canopies, indoor and outdoor swimming pools, outdoor multi use court, outdoor battle box exercise facility, external spa garden, child activity area, lounge facilities including a business hub and terrace, together with ancillary facilities, car parking, servicing, landscaping and associated works.
Case officer:	James Taylor

Recommendations:

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

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date)
1	Species surveys	Wiltshire CP50, NPPF, Habs. Regs. 2017	12/05/2026 -Clarification of previous bat survey methodologies, dates and results -Results of update surveys of bats to inform HRA -Information on roosting potential of trees on, and bordering, the site -Results of update reptile surveys, or clear justification as to why these are not necessary (including a mitigation plan) -Clarification of GCN assessment methodology and dates of survey of Pond 1	
2	BNG	Environment Act 2021, Town and Country Planning Order 2015, Wiltshire CP50	12/05/2026 -Consideration of flood risk/habitat management and suitability, within BNG Assessment/HMMP	

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, Lichfields, March 2026
- Ecological Appraisal, Ecosupport, February 2026
- Biodiversity Net Gain Assessment HMMP, Ecosupport, February 2026
- Baseline Habitats Map, Ecosupport, March 2026
- Proposed Habitats Map, Ecosupport, March 2026
- Statutory Biodiversity Metric, Laura Purnell, February 2026
- Existing Site Plan, Hadfield Cawkwell Davidson, February 2026
- Proposed Site Plan, Hadfield Cawkwell Davidson, February 2026

The site primarily contains modified grassland, which was farmed until 2020. There is an area of bramble scrub and scattered trees to the southwest, as well as tall forbs along the northern boundary. To the west is a railway line, to the south is a new road, and to the north there are further fields (to be developed). It is proposed to construct a health, fitness and racquets club. The site is part of a wider mixed-use allocated development (including >1,000 houses and employment land) in Chippenham. Ecology survey work was carried out in 2008 by Nicholas Pearson Associates, and in 2012, 2015, 2019 and 2020 by Engain to inform the outline planning permission, and in 2026 by Ecosupport.

COMMENTS:

Bats – background

Ten bat transects were carried out and static detectors were deployed on three occasions between September 2011 and August 2012. In 2015, two more transects were completed and two static bat detectors were deployed. Most of the activity recorded was along the hedgerows to the north of the site (outside of the application site boundary). Greater Horseshoe bats and Bechstein's bats were recorded in low numbers (maximum 6 records). Bechstein presence has also been noted in nearby sites (e.g., PL/2024/02998).

Neither the full results nor methodology of the 2011-2015 surveys have been provided. It appears that no update surveys have been undertaken, with insufficient justification provided for this. As per CIEEM's (Chartered Institute of Ecology and Environmental Management) Advice Note ([Advice-Note.pdf](#)), referred to in the Government's standing advice on protected species and development, if data were collected over 18 months ago, the results may no longer be valid. Surveys undertaken over 3 years ago "*are likely to need to be updated*".

As such, the results of updated bat surveys, and any additional results/survey reports and relevant mitigation, should be submitted to the LPA to further inform this application. This includes the results of assessments of roosting potential of any trees on-site; whilst information regarding the previous roosting assessment is appreciated, it is unclear whether any of the remaining trees on-site, or close to the site boundaries (and those which could be impacted by the effects of increased urbanisation, lighting, etc.), possess potential bat roosting features.

Bats – protected sites

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

The site lies within two core roost buffers for Bechstein's bats associated with the Bath and Bradford-on-Avon Bats SAC. It therefore may have the potential to result in significant adverse

impact on the special features of that site. Appropriate Assessment (AA) under Section 63 of the Habitats Regulations 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. The results of update activity surveys, and any additional results/survey reports and relevant mitigation, should be submitted to the LPA to further inform this application.

Other protected species

Badgers

Under the Protection of Badgers Act 1992, it is an offence to harm badgers or damage or destroy their setts or disturb badgers within their setts. Planning permission for development does not provide a defence against prosecution under these legislations.

Badger walkover surveys were conducted in 2011, 2015, 2020 and 2026. In 2011, three outlier setts and one main sett were identified on-site. As of 2026, no setts were found to be present. However, the site still offers suitable badger foraging habitat, and new setts can be opened up in a short space of time. Therefore, an update badger survey will be necessary prior to the commencement of works. If evidence of an active badger sett is found before or during the works, the applicant is advised to stop work and seek advice from an independent ecologist. Details of how the site will be checked for badgers – as well as mitigation, and appropriate precautions during the construction phase – must be included in a **Construction Environment Management Plan (CEMP), to be secured via a condition.**

Reptiles

A reptile survey was undertaken in 2012. The surveys identified slow worm and grass snake in land neighbouring the site. It is not clear whether the 2012 surveys targeted the present application site as the methodology has not been provided. Furthermore, as above, surveys undertaken over 3 years ago are likely to need updating.

The site has changed since the previous surveys as it is no longer farmed, and presumably the grass has been left to grow as a longer sward, appearing tussocky in some photos. It is therefore possible that the site provides habitat suitable for reptiles within the grassland, as well as the boundary areas of scrub and hedgerow. Clear justification for the lack of any update surveys and a sufficient mitigation plan must be provided.

Great Crested Newts (GCN)

GCN have been recorded previously within ponds/fields connecting to the site, and the site provides some habitat that could be used by GCN during their terrestrial phase. Presently, three ponds were identified within 500m of the site boundary, two of which had been recently constructed and are isolated by development and a railway line. The third pond was one previously confirmed as not supporting GCN. Full details of the assessment of this pond (labelled 'Pond 1') have not been provided. It is not known on what date the pond was originally found to be 'negative', nor what survey techniques were used, nor if there are significant barriers to dispersal between Pond 1 and the site – further information is required.

Nesting birds

The grassland is considered to be largely unsuitable for use by ground nesting birds. However, the boundary habitats likely provide some opportunities for 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. Works should not take place that will harm nesting birds (such as vegetation clearance or building demolition) from March to August inclusive. 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. Suitable precautions should be detailed within the CEMP.

Habitats and enhancements

The tall forbs are bordered by native-species hedgerow(s) which, although off-site, must be considered within a Construction Environmental Management Plan (CEMP) to be secured via a condition. A Landscape Ecological Management Plan (LEMP) must also be secured via condition to include details of ongoing management of the proposed habitats, such as woodland, scrub and SuDS areas. The LEMP must consider the implications of the site, and habitats, being within Flood Zone 3. The LEMP must also include the locations and specifications of enhancements for wildlife, in line with the NPPF and CP50. The ecology report's recommendations of one invertebrate hotel and three log piles are welcomed, however, given the site size and the scale of the proposal, further enhancement features are expected.

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 maps (*Biodiversity Net Gain Assessment HMMP, Ecosupport, February 2026; Baseline Habitats Map, Ecosupport, March 2026; Proposed Habitats Map, Ecosupport, March 2026; Statutory Biodiversity Metric, Laura Purnell, February 2026*) stating 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	7.26 Habitat units
	0.00 Hedgerow units
	0.00 Watercourse units
Are there any irreplaceable habitats on-site?	No
Has any habitat degradation occurred?	No

Whilst the proposed on-site gains are welcomed, consideration has not been given to the site's risk of flooding and how this may impact the deliverability of the proposed habitats. For example, it is unclear whether the proposed woodland species would comprise those that can tolerate periods of waterlogging. It is therefore requested that the submitted BNG/HMMP document is revised to discuss the risk of flooding, and the implications of this on achieving target criteria as well as management regimes.

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 all issues resolved

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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