

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jessica Cracknell
Date:	08/06/2026
Application Number:	PL/2025/09161
Proposal:	Erection of replacement dwelling and change of use of adjoining land to provide an enlarged residential garden and curtilage
Site Address:	Purley Farmhouse, Chelworth Road, Cricklade, SN6 6HE
Case Officer:	Samantha Stockley

Recommendations:

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

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date submitted)
1	Local Wildlife Site and Priority Habitat	NPPF, CP50	08/06/2026 Clarification is required regarding the extent of the proposals in relation to Local Wildlife Site and degradation/clearance of habitat onsite (see comments in main text)	NO
2	Bat Roost Mitigation/ Enhancement	Habs Regs, WCA, NPPF, CP50	08/06/2026 The proposed site plans, floor plans and elevation drawings must include the bat roost mitigation/enhancement measures.	NO
3	Biodiversity Net Gain (BNG)	Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021)	08/06/2026 Submission of statutory metric calculation with the correct baseline habitats, and associated plans and condition assessment sheets.	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:

- Ecological Survey Report. 17 November 2025. Herdwick Ecology. Report Ref. 414/R1/2025/V1;
- Proposed Site Plan. November 2025. LPC (Trull) Ltd. Drawing No. LPC 3854 PR 101;
- NE & SE Elevations – Proposed. November 2025. LPC (Trull) Ltd. Drawing No. LPC 3854 PR 106;
- SW & NW Elevations – Proposed. November 2025. LPC (Trull) Ltd. Drawing No. LPC 3854 PR 105;
- Existing Site Plan. July 2025. LPC (Trull) Ltd. Drawing No. LPC 3854 EX 101;
- Existing Elevations. July 2025. LPC (Trull) Ltd. Drawing No. LPC 3854 EX 103;
- Planning Statement. November 2025. LPC (Trull) Ltd. Ref. SWLC.LPC3854.

North Meadow and Clattinger Farm Special Area of Conservation (SAC)

The development lies within the inner zone of influence (0-4.2km) for the North Meadow National Nature Reserve (NNR)/Site of Special Scientific Interest (SSSI) component of North Meadow and Clattinger Farm SAC, notified as an exceptional example of lowland meadow with a very high proportion of the surviving UK population of snake's head fritillary. The development is screened into Appropriate Assessment under the Habitat Regulations 2017 (as amended) on account of its potential to cause adverse effects through increased recreational pressure, which may occur alone or in-combination with other plans and projects.

A test of likely significance has been carried out by the relevant Competent Authority (Wiltshire Council) as required by Regulation 63 Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. This concluded that given the scale and nature of the development (a replacement dwelling) there is no mechanism for adverse effect/any temporary construction impacts and operational impacts would be de-minimus. The Habitat Regulation Assessment (HRA) has concluded that the application will not result in any mechanism for adverse effect on the conservation objectives of the SAC and subsequently is screened out of Appropriate Assessment.

Blakehill Farm WWT Reserve Local Wildlife Site (LWS) and Priority Habitat

The submitted ecological information is insufficient to fully assess the impacts of the proposed development on local wildlife sites, priority habitats and associated biodiversity, conflicting with the requirements of the NPPF and Core Policy 50 of the Wiltshire Core Strategy.

Ecological Survey Report section 5.5 states "*The Application Site lies adjacent to the Blakehill Farm Natuyre Reserve. There are no direct impacts to this site.*" According to our records the Blakehill Farm WWT Reserve Local Wildlife Site (LWS) lies within the redline boundary and is designated for its neutral grassland. Priority Habitat Traditional Orchard sits within the south of the site. As such, this habitat is protected from development under Core Policy 50 of the Wiltshire Core Strategy and under the National Planning Policy Framework (NPPF). In accordance with Core Policy 50, development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term. Where it has been demonstrated that such features cannot be retained, removal or damage shall only be acceptable in circumstances where the anticipated ecological impacts have been mitigated as far as possible and appropriate compensatory measures can be secured to ensure no net loss of the local biodiversity resource.

Further information is required to clarify the extent of the LWS within the site and to provide an impact assessment, including direct and indirect effects as a result of the proposed development. It must be demonstrated how the adjacent priority habitat traditional orchard will be protected from damage, degradation, or fragmentation with appropriate long-term management measures to ensure no deterioration of this habitat. 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.

Habitats

Section 4.10 of the Ecological Survey Report notes: *“There has been some site clearance to allow for ground investigations...”*. The submitted information suggests that habitats, including trees and potentially priority habitats, may have been lost or degraded prior to the submission of the application. Clarification is required regarding the current baseline condition of the site and the extent of the clearance works. Further survey work, including botanical surveys, is required to accurately classify all habitats on site, whether lost or degraded, with the inclusion of these habitats within the baseline Biodiversity Net Gain (BNG) calculations.

Given the location of the development to sensitive receptors, there is potential for adverse effects arising from construction-related activities. Appropriate protection measures should be secured through the implementation of a Construction Method Statement (CMS). Further mitigation measures will be required should any adverse effects arise on the neighbouring LWS.

Bat Species

Herdwick Ecology undertook, three dusk emergence surveys during the active bat survey season in 2025. These surveys identified bat droppings and a number of potential features within the building. The house supports a day roost for low numbers of common pipistrelle bats. Subject to the retention of key boundary features and the implementation of an appropriate lighting strategy, it is considered likely that the functionality of habitats within the site, and their availability for foraging and commuting bats, will not be adversely affected.

The roof space of Purley Farmhouse, Chelworth Road, Cricklade, SN6 6HE is used as a bat roost. Under the Conservation of Habitat Regulations, it is an offence to harm or disturb bats or damage or destroy their roosts. Planning permission for development does not provide a defence against prosecution under this legislation. The applicant is advised that a Natural England licence will be required before any work is undertaken to implement this planning permission.

The Herdwick Ecology Ecological Survey Report gives recommendations for precautionary working methods and for the provision of mitigation measures, including the provision of two Schwegler bat tubes or similar inbuilt into the new southern gable end, together with a bat box (1FF Schwegler7 or similar) on the southern side of the oak tree within the garden. **These mitigation/enhancements will need to be repeated in the licence application. This mitigation and the location of the bat boxes must be included in the site plan drawings and will become an enforceable part of the planning permission.**

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. 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.

Nesting 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. Please be advised that works should not take place that will harm nesting birds from March to August inclusive. 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.

Biodiversity Net Gain

This application was submitted after Biodiversity Net Gain (BNG) became mandatory however information required for applications subject to the biodiversity gain condition has not been submitted. 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 confirm the pre- and post- intervention biodiversity value of Site by submitting the completed statutory metric.

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.

There is evidence that degradation of the site resulting in a reduction of its likely baseline value has been carried out prior to the application being submitted. The metric must be submitted to reflect the condition of the Site prior to the degradation being carried out and submitted to the LPA for review prior to determination.

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 anticipated that all developments will deliver no net loss of biodiversity. For this application, biodiversity measures should focus on delivering continued ecological functionality for bats, swifts and hedgehog.

The Ecological Survey Report recommends the inclusion of bird boxes and habitat boxes/log piles. All details on exact locations and specifications must be added to all working plans (see condition below) and will become an enforceable part of the planning permission to avoid oversight and to ensure consistency and enforceability. 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. Bird/bat boxes will continue to be available for birds/bats for the lifetime of the development.

CONDITIONS: these will be added once the issues above have been addressed

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

Ecologist	Date