

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	14/07/2026
Application number:	PL/2026/03013
Proposal:	Two Storey Extension
Site address:	Washpool Cottage, Pewsey Road, Marlborough, SN8 4DJ
Case officer:	Hannah Brown

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)
	Ecology surveys	-Wiltshire CP50 -NPPF -Habs. Regs. 2017	14/07/2026 -The previous preliminary ecological appraisal and bat surveys were undertaken in 2019, and are considered to be out of date. Up-to-date survey results are required.	
	CWSs and Priority Habitat	-Wiltshire CP50	14/07/2026 -Details of protective measures for surrounding County Wildlife Sites and Priority Habitat	

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:

- Proposed elevations and plans, AD Draughting, May 2026
- Existing elevations and plans, AD Draughting, May 2026
- Environment Agency – Method Statement, AD Draughting, May 2026

The site comprises a detached dwelling where a two-storey extension is proposed. The property is encompassed by the River Kennet (and associated washpool) and woodland, with a calcareous grassland County Wildlife Site (Granham Hill) ~20m south. Previously, the site has been subject to various applications for reconstruction (18/00705/FUL; withdrawn), extension (19/00163/FUL; approved; 19/08048/FUL; approved), the erection of a garden room (PL/2022/08316; approved), garage works (PL/2022/09739; approved) and more.

COMMENTS:

Survey data

No ecology report(s) have been submitted with this application, though surveys were undertaken in 2019 in association with 19/00163/FUL and 19/08048/FUL. 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 can be considered to be no longer be valid. In this case, given the length of time that has now passed (six years) as well as the comments below, updated ecological surveys are required.

Protected and notable species

A survey report submitted in association with 19/00163/FUL notes that a few individual bat droppings were observed in the loft space, confirmed via DNA analysis as belonging to Soprano Pipistrelle bats. Three further surveys were recommended, but it appears that only two were undertaken. During both surveys, 1 Soprano Pipistrelle was recorded emerging from the property, with other bats observed investigating the roof and foraging in the vicinity.

The current condition of the building is unknown, though the plans show quite a significant extension impacting sections of the existing roof. Also during the 2019 survey, a water vole latrine was observed on the margin of the washpool, and signs of otter activity were observed 5m from the plot. As such, an update ecology survey is required and must include consideration of the site's use by otter, water vole and bats, as well as any relevant mitigation. The submitted 'Environment Agency Risk Assessment' does not sufficiently address these points as it does not refer to updated survey data, nor mitigation based on such data.

Protected and notable habitats

As noted above, the site is encompassed by the River Kennet (and associated washpool), which forms a County Wildlife Site, with a calcareous grassland County Wildlife Site (Granham Hill) ~20m south. CP50 requires that CWSs are protected from the effects of development, and that proposals must demonstrate how features of nature conservation can be protected.

The woodland surrounding the site is identified in Natural England's Priority Habitat Inventory. Lowland mixed deciduous woodland in England is categorised as a habitat of principal importance, or priority habitat, under Section 41 of the Natural Environment and Rural Communities (NERC) Act. Paragraph 192 of the NPPF states that plans should "*promote the conservation, restoration and enhancement of priority habitats*".

Protective measures with regard to the CWS and Priority Habitat must therefore also be provided in either the ecology report (as required above) or another suitable document (e.g., a Construction Method Statement).

Biodiversity Net Gain

From 12 February 2024 Biodiversity Net Gain (BNG) became mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Based on the information available the biodiversity gain planning condition is not considered to apply to this application as it is for development which is subject of a householder application within the meaning of article 2(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Note to case officer: you should be satisfied that the proposals meet the above criteria and act accordingly. Further information will be required from the applicant prior to determination in the event the application is considered to be subject to mandatory biodiversity net gain.

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
------------------	-------------