

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jessica Cracknell
Date:	14/07/2026
Application Number:	PL/2025/09780
Proposal:	Outline planning application for the construction of 295 homes; public open space including formal play space and allotments; sustainable drainage systems and associated infrastructure; a 100 place nursery and access points for pedestrians and cyclists. All matters are reserved except for access, the principal point of access is to be provided from a new northern arm onto an improved arrangement of the Eastern Way/A3102 roundabout junction and an emergency access onto the A3102.
Site Address:	Land to the north of the A3102, Melksham, Wiltshire
Case Officer:	Ruaridh O'Donoghue

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	Ecological Impact Assessment (EclA): Protected Species	NPPF, CP50, Habs Regs	14/07/2026 Protected Species surveys submitted within the EclA were undertaken between January 2023 and October 2023 and is considered to be out of date. An updated PEA/Ecological Assessment must be undertaken to determine potential impacts on the habitats and protected species within the site boundary.	NO
2	Ecological Parameters Plan	CP50, NPPF	14/07/2026 Provision of a suitably detailed Ecological Parameters Plan (EPP). See comments in main text.	NO
3	Biodiversity Net Gain (BNG)	Schedule 7A of the Town and Country Planning Act 1990	14/07/2026 Submission of statutory metric calculation showing the	NO

		(as inserted by Schedule 14 of the Environment Act 2021)	calculations of the pre-development biodiversity value of the onsite habitat on the date of application (or proposed earlier date), and associated habitat plans and condition assessment sheets.	
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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 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 Impact Assessment. 06 November 2025. Ge Consulting. Rev. V1;
- Appendix 8.2: Biodiversity Net Gain Statement and Assessment. 05 November 2025. GE Consulting. Rev. V1;
- Arboricultural Impact Assessment. 05 November 2025. GE Consulting. Report Ref. 1795B-OUT-AIA-MU. Rev. 2;
- Green Infrastructure Parameters Plan. 27 October 2025. Marrons. Drawing No. 2513292.1 Rev. A;
- Parameters Plan. 27 October 2025. Marrons. Drawing No. 2513292.1. Rev. G;
- Illustrative Masterplan. 15 October 2025. Marrons. Rev. A;
- Design and Access Statement. October 2025. Marrons;
- Planning Statement. December 2025. LRM Planning Limited;

Protected Habitats and Species

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 was 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 (over 2 years), an updated ecological survey is required. 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 updated survey work must be completed and submitted for review by the LPA's ecology team prior to determination. The results should confirm the current status of the site and may necessitate revisions to the proposed mitigation and enhancement measures, which must be updated and secured accordingly. I therefore maintain a holding objection until all the issues listed above have been suitably addressed.

Key principals within proposals should be to retain the functionality of ecological features within the site, for the benefit of species known to be or likely to be present in the local area. Site drawings must identify all measured areas of habitat to be retained and enhanced or created. Evidence demonstrating no net loss of local biodiversity resource and that the integrity of ecological networks will be secured and must be submitted and reviewed by the LPA's ecology team prior to a planning permission being given.

Protected Habitats

It is understood that 260 m of hedgerow will be lost to facilitate the development, the submitted Biodiversity Net Gain Statement and Assessment indicates 190 m hedgerow will be created, an overall loss of approx. 70 m of priority habitat. Policy 17 of the Joint Melksham Neighbourhood Plan 2020-2038 seeks the retention and protection of important trees and hedgerows, with suitable replacement planting where losses are unavoidable. The protection and enhancement of retained hedgerows is welcomed, as is the retention and protection of individual trees.

The retention of the watercourse (a priority habitat) as a green corridor is welcomed however it is noted that some culverting will be extended, thus reducing the naturalness of the watercourse (a key feature of the rivers

priority habitat description). Policy 12 of the Joint Melksham Neighbourhood Plan 2020-2038 requires development to demonstrate how existing green and blue infrastructure (GBI) has been incorporated into the scheme, and how the proposals will protect, enhance and improve the connectivity and function of GBI within the site and the wider landscape. The Ecological Impact Assessment proposes a 20m-wide riparian buffer corridor to safeguard the watercourse from urbanisation impacts, maintain and enhance habitat connectivity, and provide opportunities for ecological enhancement. These buffer areas, together with the associated habitat creation, enhancement and long-term management measures, should be clearly identified and secured within the Ecological Parameters Plan. The Plan should demonstrate how the watercourse corridor will be protected, enhanced and managed in perpetuity, including details of riparian planting, habitat management prescriptions, buffer widths, and measures to maintain and improve the ecological function of the corridor for the identified protected species within the site.

Core Policy 50 expects the following for features of nature conservation *“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”*.

Ecological Parameters Plan (EPP)

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. Identify where new habitats will be created and habitat enhancement will be undertaken on site, include minimum area in hectares or length in metres and habitat type
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. State the minimum distances between the built development and the edge of the watercourse. These buffers must be sufficient to enable the watercourse and associated riparian habitats to be managed and maintained for the benefit of biodiversity.
5. Demonstrate how sufficient replacement and compensatory planting will be provided to offset the loss of hedgerow priority habitat and ensure no net loss of biodiversity resource. Any compensatory habitat must be appropriately buffered from the development and designed to enable its long-term management for biodiversity.
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.
8. Include prescriptions for enhancement of the watercourse and its riparian corridor, such as re-naturalisation of the channel and banks, riparian planting, and other measures to improve the condition of this priority habitat.

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.

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
- condition assessment sheets 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.

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 swifts, bats, hedgehogs and reptiles.

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. Locations should be chosen in consultation with a professional ecologist to ensure they are appropriately positioned, and the following details must be provided: location, number, type (include make/model, if appropriate) and positioning (height, aspect, surrounding habitat, as applicable). The locations of these features must be provided on site plan/elevation drawings (Ecological Enhancement Plan. 30 October 2025. GE Consulting. Ref. 1795B-EEP-F1. Rev. 1) and will become an enforceable part of the planning permission. 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