

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jessica Cracknell
Date:	23/07/2026
Application Number:	PL/2026/02765
Proposal:	The replacement of two mobile classroom buildings with a new, permanent three-classroom extension
Site Address:	Hullavington C of E Primary School, The Street, Hullavington, Chippenham, SN14 6EF
Case Officer:	Isobella Wise

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	Biodiversity Net Gain (BNG)	Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021)	23/07/2026 Submission of statutory metric calculation with the correct baseline habitats, condition assessments and associated baseline habitat plans. (see comments in main text)	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. April 2026. Diversity Environmental Consultants Ltd. Report Ref. d595.1;
- The Statutory Biodiversity Metric. 28 April 2026. Iteration. 1;
- Arboricultural Method Statement. 27 April 2026. Arbtech. Arbtech Project Ref. 43495563;
- Arboricultural Impact Assessment. 24 April 2026. Arbtech. Project No. 43495563. Drawing No. AIA01. Rev. 01;
- Tree Protection Plan. 24 April 2026. Arbtech. Project No. 43495563. Drawing No. PP01. Rev. 01;

- Planting Plan. 15 May 2026. Roundfield. Drawing No. 2425-RF-XX-HSXX-DR-L-2000. Rev. P02;
- Planting Schedule. 27 April 2026. Roundfield. 2425-RF-XX-HSXX-SCH-L-6000. Rev. P01;
- Site Location and Block Plan. 28 April 2026. Footprint Architects. Drawing No. 2425-FTP-XX-HSXX-DR-A 1001. Rev. P03;
- Proposed Site Plan. 28 April 2026. Footprint Architects. Drawing No. 2425-FTP-ZZ-HS00-DR-A 1005. Rev. P03;
- Proposed North and East Elevations. 24 June 2026. Footprint Architects. Drawing No. 2425-FTP-ZZ-HSZZ-DR-A 2210. Rev. P04;
- Proposed South and West Elevations. 24 June 2026. Footprint Architects. Drawing No. 2425-FTP-ZZ-HSZZ-DR-A 2211. Rev. P04;
- Existing Site Plan. 28 April 2026. Footprint Architects. Drawing No. 2425-FTP-XX-HSZZ-DR-A 1003. Rev. P03;
- Existing Elevations. 28 April 2026. Footprint Architects. Drawing No. 2425-FTP-XX-HSZZ-DR-A 2200. Rev. P03;
- Design and Access Statement. 28 April 2026. Footprint Architects. Project Ref. 7428. Doc No. 2425-FTP-HS-XX-DR-A-0004. Rev. P03.

The proposed site does not lie within or adjacent to any sites designated for conservation and there are no areas of significant ecological importance within a zone of influence, it is expected that any adverse impacts on protected species or habitats could be suitably mitigated through an appropriate design scheme and timing of works.

Protected Species

An ecological site survey was undertaken in March 2026 in support of the application. Although the survey was undertaken outside the optimal period for certain protected species survey work, given the nature of the site, the information provided is considered sufficient to inform the assessment in this instance. However, it is expected that any future protected species surveys are undertaken during the optimal survey window.

The Ecological Survey report identified the existing buildings as having low to negligible potential to support roosting bats. The site is assessed to offering suitability for foraging and commuting bats. The replacement of two mobile classroom buildings with a new, permanent three-classroom extension will not require the removal of vegetation considered to be functionally valuable for foraging or commuting bats. Subject to retention of key boundary features and implementation of a sensitive lighting strategy, it is likely that the functionality of the habitats within the site and their availability to bats will not be adversely affected. Should the proposals change such that trees or existing features with potential roosting features are affected, further survey work would be required and mitigation measures would need to be reviewed and updated accordingly.

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. This will likely result in a significant negative impact upon the health of bat populations across the region. Artificial light at night can have a substantial adverse effect on biodiversity. 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

Where possible, vegetation removal should be scheduled outside the bird breeding season (1st March–31st August) to avoid potential disturbance. If removal during this period is unavoidable, a pre-works nesting bird inspection must be conducted no more than two weeks before tree felling begins. 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.

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 (28 April 2026. Iteration. 1) confirming the baseline and predicted post- development biodiversity units of the site has been submitted (including the baseline habitat maps).

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

- The habitats recorded within the Statutory Biodiversity metric does not align with Plan 1 Habitats. April 2026. Diversity Environmental Consultants Ltd. Drawing No. d595_001 (Ecological Survey Report. April 2026. Diversity Environmental Consultants Ltd. Report Ref. d595.1). The baseline habitat types recorded within the metric and the accompanying habitat maps must align.
 - Plan 1 Habitats (April 2026. Diversity Environmental Consultants Ltd. Drawing No. d595_001) records 'Trees', 'Ornamental Shrubs', 'Tall Ruderal', 'Buildings and Hardstanding', 'Amenity Grassland' and 'Vegetable Garden' within the baseline habitats, the Statutory Biodiversity Metric (28 April 2026. Iteration. 1) does not include these baseline habitats.
 - The Statutory Biodiversity Metric (28 April 2026. Iteration. 1) records 'artificial unvegetated, unsealed surface', 'modified grassland', 'other neutral grassland', 'mixed scrub', 'vegetated garden', 'line of trees' within the baseline habitats, Plan 1 Habitats (April 2026. Diversity Environmental Consultants Ltd. Drawing No. d595_001) does not include these habitats within the baseline habitat.
- The condition assessment sheets have not been submitted. This information is a minimum requirement set out in Article 7 of The Town and Country Planning (Development Management Procedure) (England) Order 2015 and must therefore be submitted for review by the ecology team prior to determination.

All submitted documentation must align, with the same recorded baseline habitat area reflected across all documentation. The information outlined above must therefore be submitted and reviewed by the LPA's ecology team prior to determination of the application.

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, and hedgehogs.

The Ecological Survey Report recommends the inclusion of bird and bat boxes. 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 (see condition below) 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.

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: 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