

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jenna Buss
Date:	17/02/2026 27/07/2026
Application number:	PL/2025/09668
Proposal:	Construction of two dwellings and associated works
Site address:	Land Adj Windrush, High Road, Ashton Keynes, Swindon, Wilts, SN6 6NX
Case officer:	Hilary Quixley

Recommendations:

	No Comment
	Support
	No objection
x	Condition (no objection subject to conditions)
	Objection - further information required
	Objection in principle
x	HRA completed/required

I have reviewed the application and supporting documents against OS Maps and aerial photography of the site and surrounding area, together with GIS layers of statutory and non-statutory sites and existing records of protected species.

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date)
1	Protected Species	Habitat Regulations	DLL- signed IACPC	YES
2	BNG	Environment Act	Amended Baseline metric to include access	YES

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.

The following submitted documentation was reviewed to inform this response:

- Site Layout 1437/1. October 2025. Partridge Homes Ltd
- Statutory Biodiversity Metric. December 2025. Jacob Richardson
- Preliminary Ecological Appraisal. November 2025. All Ecology
- Reptile Survey. October 2025. All Ecology
- Biodiversity Net Gain Design Stage Report. December 2025. All Ecology
- [IACPC DLL-ENQ-WILT-00144. March 2026. Natural England](#)
- [CEMP. June 2026. Partridge Homes](#)

- [Landscaping Plan AK/025/04. November 2025. Uno Range Architect](#)

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

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.

Wiltshire Council, Cotswold District Council and Swindon Borough Council in partnership with Natural England have produced an Interim (2023-2028) Recreation Mitigation Strategy for proposed development within this zone.

The standard mitigation agreed under the above strategy for all relevant (e.g., overnight accommodation) development of under 50 units in the Inner Zone is:

- Strategic Access Management and Monitoring (SAMM) contribution per unit £356
- Infrastructure Mitigation Projects/Suitable Alternative Natural Greenspace (SANG) contribution per unit £480

Total financial contribution to ensure the delivery of the Interim Mitigation Strategy is currently £836 per unit. Full details of the mitigation strategy, affected developments, and current charge per unit can be found on our website [Biodiversity and development - Wiltshire Council](#). For this application the combined mitigation payments will total £1672.

Developer contributions must be secured using a S111 Agreement (prior to determination), Unilateral Undertaking or a S106 Agreement. The applicant should be directed to the Guidance Note for Completing Agreements Under S.111 of the Local Government Act 1972.

The LPA concludes that subject to the mitigation measures detailed in the Interim (2023-2028) Recreation Mitigation Strategy being secured via an appropriate method (see above), the Appropriate Assessment concludes no adverse effects on the integrity of the North Meadow and Clattinger Farm SAC. The AA will be sent to Natural England and the application must not be determined until they have agreed with the LPAs conclusion.

Local Wildlife Site-Thames

This application lies adjacent to the Thames River Local Wildlife Site which flows along the southern boundary. It is noted that the proposals will be set back from the river bank and no direct impacts to the water course are anticipated which is welcomed. A Construction Environment Management Plan will be required to ensure no impacts to the LWS during construction, this could be secured by condition.

The submitted CEMP is welcomed however it does not address our concerns in relation to construction activities in close proximity to a watercourse. Although Appendix C demonstrates that security fencing will be used to prevent access to the watercourse, measures to ensure spills and run off into the water course will be prevented. Additional information will therefore be required in the form of a Construction Method Statement (CMS) to include:

- Details of all pollution prevention measures to ensure no discharge of contaminated water, cement, concrete washout etc into the water course.
- Location of Storage location compound and storage details

- Details of spill kits and pollution incident response procedures
- Demonstration that Contractors will comply with current Environment Agency Pollution Prevention Guidance and relevant best-practice guidance (e.g. CIRIA C741 Environmental Good Practice on Site).

Indirect impacts from light spill should also be considered and a lighting plan to demonstrate that the river corridor remains dark must be demonstrated. This could be secured by condition via a lighting plan.

It is advised that housing should be separated from the river corridor as seen in the buildings adjacent to ensure the river corridor is retained outside of the residential curtilage.

From the submitted Landscaping Plan, it is clear that the proposed house will not be separated from the river bank through close board fencing as the adjacent houses are. This should be amended to ensure impacts to the watercourse during occupation are minimised.

Cotswold Water Park SSSI

The site lies in close proximity to the Cotswold Water Park SSSI. Due to the nature and location of the proposal, it is anticipated that there will be no impacts to this site and is scoped out of further assessment. The conditioned CMS will also ensure construction works is localised.

Protected and Notable Species/Habitats

An ecological assessment was submitted in support of the proposals which is welcomed.

The site consists of hardstanding and buildings with areas of grassland and scrub, ruderal ephemeral and individual trees.

Bats

The agricultural buildings on site will be lost. The buildings are open and well lit and have been assessed as lacking potential roosting features with no evidence of use. The buildings are assessed as having negligible potential to support bats.

There is a low risk that bats may occur at the development site. Many species of bat depend on buildings for roosting, with each having its own preferred type of roost. Most species roost in crevices such as under ridge tiles, behind roofing felt or in cavity walls and are therefore not often seen in the roof space. Bat roosts are protected all times by the Conservation of Habitats and Species 2017 (as amended) even when bats are temporarily absent because, being creatures of habit, they usually return to the same roost site every year. Planning permission for development does not provide a defence against prosecution under this legislation or substitute for the need to obtain a bat licence if an offence is likely. If bats or evidence of bats is found during the works, the applicant is advised to stop work and follow advice from an independent ecologist or the applicant is advised to follow the advice of a professional ecologist or to contact Natural England's Batline through the internet.

Bats will be using the site to forage and commute through the landscape and particularly along the river corridor. An increase in artificial lux levels from external lighting could deter a number of species from utilising this resource, including bats which could result in roost abandonment and/or the severance of key foraging areas. 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.

Otters

The river Thames runs along the boundary to the south, although no direct impacts to the water course are predicted. Indirect impacts should be considered and otter are known to move some distances from watercourses to find shelter and food. Records exist within the area for otter and should therefore be a consideration within the CMS to ensure these mammals are protected during construction.

Reptiles

No evidence of reptiles were identified on site, however it is noted that the site provides optimal habitat. There is a residual risk that reptiles could occur on the application site. These species are legally protected and planning permission does not provide a defence against prosecution. In order to minimise the risk of these species occurring on the site, the developer is advised to clear vegetation during the winter, remove all waste arising from such clearance and maintain vegetation as short as possible. If these species are found during the works, the applicant is advised to stop work and follow advice from an independent ecologist or the Council Landscape and Design Team (ecologyconsultations@wiltshire.gov.uk).

Amphibians

The site provides optimal habitat for amphibians. There are no ponds on site however there are multiple ponds within 250m. The closest accessible pond scored a 'good' HSI rating.

The site has been assessed as suitable to support GCN in their terrestrial phase. A rapid risk assessment has been undertaken which concludes that an offence would be 'highly likely'. The report states that a district licence will be applied for to permit the works on site.

The applicant must apply to Natural England to determine whether the scheme is eligible for District Level Licencing. Once the scheme is accepted under the DLL Scheme for Great Crested Newts, the *Impact Assessment and Conservation Payment Certificate (IACPC)*, which must be signed by the applicant and countersigned by Natural England must be submitted to the LPA prior to determination.

[A completed IACPC has been submitted in support of the application with corresponding Map, Annex 3 DLL-ENQ-WILT-00144 which is welcomed.](#)

Birds

No bird nests were identified on site. However, demolition works should be scheduled outside of the bird nesting season. 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.

BNG

The red line boundary of the site doesn't appear to reflect the proposed development site with the proposed access route not currently included. This should be amended to include the whole site with inclusion within the BNG baseline assessment.

[Additional information submitted in support of the application states that the access route will be subject to a separate application.](#)

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 (Statutory Biodiversity Metric, December 2025, Jacob Richardson) confirming the baseline and predicted post-development biodiversity units of the site has been submitted (including the condition assessment sheets and maps).

~~Information in the completed on-site baseline habitat tabs is not accepted due to the red line boundary not reflecting the proposed impacts around the access area. This must be amended to include the proposed habitat changes at the access point and resubmitted for review.~~

Information in the completed on-site baseline habitat tabs is accepted as accurate based on the information submitted. The pre-development (baseline) situation is summarised below.

On-site pre-development (baseline) biodiversity value	0.37 Habitat units
	0.70 Hedgerow units
	0.55 Watercourse units
Are there any <u>irreplaceable</u> habitats on-site?	No
Has any habitat <u>degradation</u> of occurred?	No

There are issues with the metric that must be addressed with gain plan submission. The Biodiversity Gain Plan must be accompanied by a completed Biodiversity Metric with the following issues addressed:

- Confirmation that the retained hedgerows are outside of the residential curtilages
- Details of the River Thames post development scenario including details of the habitat created in advance years.

From the metric submitted it is evident that BNG will not be achieved on site and therefore offsite proposals will need to be considered.

All land located outside the redline application boundary of the development site is considered off-site (refer to information here [Make off-site biodiversity gains as a developer - GOV.UK](#))

All off-site biodiversity gains sites must be registered on the national biodiversity gains site register. Guidance on how to register a biodiversity gains site including a list of item required to apply can be found here - [Register a biodiversity gain site - GOV.UK](#). In order for the Biodiversity Gain Plan condition to be discharged all off-site gains must be shown on the Biodiversity Gain Plan as allocated to this development on the national biodiversity gains site register.

Off-site gains must be secured via a legal agreement for at least 30 years. This must be a planning obligation (Section 106 agreement) or conservation covenant. Wiltshire Council will not enter into a Section 106 agreement for off-site gains unless the off-site gain site has been verified. Contact ecologychargeableservice@wiltshire.gov.uk to request further information on site verification.

Confirmation of how the development will achieve BNG is a post-determination matter however consideration should be given as to how any proposed BNG will be secured. Further information will be required from the applicant post determination to secure BNG.

CONDITIONS

1. No development shall commence on site (including any vegetation removal or works to existing structures), until a Construction Method Statement has been submitted to, and approved in writing by the Local Planning Authority. The Construction Method Statement shall include all precautionary measures to be implemented during the construction period, for the protection of sensitive habitats and species known to be present within or adjacent the site, with particular reference to the River Thames and protected species including otter.

The development shall be carried out in strict accordance with the approved Construction Method Statement.

REASON: To ensure adequate protection, mitigation and compensation for protected species and priority habitats throughout the construction period.

2. No external light fixture or fitting will be installed within the application site unless details of existing and proposed new lighting have been submitted to and approved by the Local Planning Authority in writing. The submitted details will demonstrate how the proposed lighting will impact on bat habitat compared to the existing situation.

The plans will be in accordance with the appropriate Environmental Zone standards set out by the Institution of Lighting Professionals (ILP) Guidance Notes on the Avoidance of Obtrusive Light (GN 01/2021) and Guidance note GN08/23 "Bats and artificial lighting at night", issued by the Bat Conservation Trust and Institution of Lighting Professionals.

REASON: To avoid illumination of habitat used by bats.

3. The development will be carried out in strict accordance with the following documents:
 - Statutory Biodiversity Metric. December 2025. Jacob Richardson
 - IACPC DLL-ENQ-WILT-00144. March 2026. Natural England

REASON: For the avoidance of doubt and for the protection, mitigation and enhancement of biodiversity.

INFORMATIVES:

Nesting Birds

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.

Final sign off – all matters addressed:

Ecologist Jenna Buss	Date 27/07/2026
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