

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jessica Cracknell
Date:	21/05/2026 24/08/2026 updated comments
Application Number:	PL/2025/09200
Proposal:	Full: Redevelopment and renovation of the existing site to provide, within the retained buildings: 1 detached dwelling, 5 flats, A terrace comprising 4 dwellings, alongside the erection of 1 self-build detached dwelling. A new one-way access road, Parking areas and footpaths, External landscaping and associated works, Installation of photovoltaics and air source heat pumps and site drainage features. Outline: Construction of 6 detached self-build dwellings
Site Address:	49, 51 & 53 (Rowden Hill House), Rowden Hill, Chippenham, SN15 2AN
Case Officer:	Peter Crozier

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)	21/05/2026 24/08/2026 Submission of statutory metric calculation with the correct baseline habitats, and associated plans and condition assessment sheets.	NO
2	Ecological Enhancements	CP50, NPPF	21/05/2026 24/08/2026 Enhancement measures suggested in ecological impact assessment to be shown on site drawings/plans including bat and bird box locations, of a ratio of 1:1 feature to building.	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:

- Preliminary Ecological Appraisal. 12 August 2025. Ellendale Environmental;
- The Statutory Biodiversity Metric. 19 November 2025. v1.0;
- Tree Report @49, 51 and 53 Rowden Hill, Chippenham, SN15 2AJ. Hardy's Tree & Landscaping Specialists;
- Tree Survey. Hardy's Tree & Landscaping Specialists;
- PR site plan. 01 March 2026. Artel 31. Drawing No. 999 - 3 - 31. Rev. A;
- EX site plan. September 2025. Artel 31. Drawing No. 999 - 3 - 01;
- Planning Statement. November 2025. LPC (Trull) Ltd. Ref. SWLC.LPC6183;
- Design and Access Statement. September 2025. Artel 31.

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.

Bat Species

Wildwood Ecology undertook a Preliminary Roost Assessment in August 2022, which identified the on-site buildings as having moderate suitability for roosting bats, due to the presence of multiple gaps and crevices within the roof structure, and soffit boxes providing potential access points. Ellendale Environmental's updated Preliminary Ecological Appraisal (PEA) assessed the buildings as having negligible potential for roosting bats, with the site offering low suitability for foraging and commuting. The PEA sets out precautionary working methods and recommends enhancement measures, including the installation of bat boxes and habitat creation. The proposed renovation of existing buildings and construction of new dwellings will not require removal of any vegetation considered to be functionally valuable to foraging or commuting 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. 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

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

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.

The submitted application, as defined by the red-line boundary, constitutes a single planning application and must be considered in its entirety for the purposes of mandatory Biodiversity Net Gain (BNG). While the proposal includes a self-build element, this does not exempt the development from the statutory BNG requirements where it forms part of a single combined application within the red-line boundary.

A completed statutory metric calculation (19 November 2025. v1.0) confirming the baseline and predicted post- development biodiversity units of the site has been submitted.

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

- The updated metric calculation shows a baseline habitat value of 6.10 area habitat units and 0.14 hedgerow units, this is different than the 6.12 area habitat units and 0.13 hedgerow units in the biodiversity metric tool originally submitted with the application. The baseline habitat value should not have changed since the application was submitted. Further clarification and detailed justification must therefore be provided to explain why the baseline values have changed.
- The habitat maps and condition assessment sheets for the baseline habitats 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.
- The Statutory Biodiversity Metric (19 November 2025. v1.0) does not match the Extended Phase 1 Map. 11 August 2025. Ellendale Environmental. Project No, EEL997. Version No. v1.0(Preliminary Ecological Appraisal. 12 August 2025. Ellendale Environmental). To ensure accuracy and compliance, the baseline habitat types recorded within the statutory biodiversity metric and any accompanying habitat maps/documentation must align and, where necessary, amended to reflect the habitats actually present on site.

The statutory metric calculation must be amended to accurately reflect all the correct baseline habitats within the redline boundary, with the associated baseline habitat plan and condition assessments and submit the updated metric and associated documents to the Local Planning Authority (LPA) for review by the ecology team prior to determination.

If planning permission is granted, a Biodiversity Gain Plan confirming how the development will meet the biodiversity gain objective must be submitted and approved prior to the commencement of the development. The Biodiversity Gain Plan must be accompanied by a completed Biodiversity Metric with the following issues addressed:

- It is currently unclear whether the habitats listed within the creation tab of the metric correspond with the habitats shown on the PR site plan (01 March 2026. Artel 31. Drawing No. 999 - 3 - 31. Rev. A). This should be clarified through the submission of a post-development habitat map linked to the metric (e.g. including habitat ID numbers) to demonstrate where each proposed habitat type will be delivered on site.
- Other neutral grassland of moderate/good condition is unlikely to be achieved in areas with high shading and/or human disturbance, we would advise that the proposed habitat should be revised to a more appropriate target.

The proposed BNG is considered 'significant' due to:

- i. the scale and nature of the application (major);
- ii. units required (6.74 area habitat units and 0.14 hedgerow units), and
- iii. the BNG proposed (including medium distinctiveness habitats of other neutral grassland, other woodland; broadleaved, other woodland; mixed, urban tree).

A Habitat Management and Monitoring Plan (HMMP) will be required and should be secured via condition.

In order for the council to fulfil its BNG monitoring responsibilities, a Biodiversity Net Gain On-site 30 year Monitoring Fee must be secured through a Section 111, Section 106 or Unilateral Undertaking at the time of permission with contributions secured prior to commencement. The applicant should be directed to

the Guidance Note for Completing Agreements Under S.111 of the Local Government Act 1972. Where the applicant elects to use the S111 process the fee must be paid and S111 signed by both the applicant and the council on the granting of planning permission.

In order for the council to fulfil its monitoring obligations, the BNG monitoring fee would be £12,000 plus legal fees payable on commencement of development.

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.

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*. All details on exact locations and specifications must be added to all working plans 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. **All details on exact locations and specifications must be added to all working plans and will become an enforceable part of the planning permission to avoid oversight and to ensure consistency and enforceability.**

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