

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jessica Cracknell
Date:	02/09/2026
Application Number:	PL/2026/02763
Proposal:	Proposed new classroom block to replace mobile building with associated landscaping
Site Address:	Minety C of E Primary School, Sawyers Hill, Minety, Malmesbury, SN16 9QL
Case Officer:	Audrey Lo

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)	02/09/2026 Submission of statutory metric calculation with the correct baseline habitats, and associated plans and condition assessment sheets (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. d595.3;
- The Statutory Biodiversity Metric. 28 April 2026. Iteration. 1;
- Tree Protection Plan. 15 July 2026. Arbtech Consulting Ltd. Project No. 43495568. Rev. 02;
- Arboricultural Method Statement. 15 July 2026. Arbtech Consulting Ltd. Project Ref. 43495568;
- Arboricultural Impact Assessment. 15 July 2026. Arbtech Consulting Ltd. Project No. 43495568. Rev. 02;
- Planting Plan. 27 April 2026. Roundfield. Drawing No. 2452-RF-XX-MSXX-DR-L-2000. Rev. P02;

- Planting Schedule. 27 April 2026. Roundfield. 2425-RF-XX-MSXX-SCH-L-6000;
- General Arrangement Plan. 27 April 2026. Roundfield. Drawing No. 2452-RF-XX-MSXX-DR-L-1000. Rev. P03;
- Site Location and Block Plan. 28 April 2026. Footprint Architects Ltd. Drawing No. 2425-FTP-XX-MSXX-DR-A 1001. Rev. P03;
- Proposed Site Plan. 09 July 2026. Footprint Architects Ltd. Drawing No. 2425-FTP-XX-MSXX-DR-A 1005. Rev. P04;
- Proposed North and South Elevations. 28 April 2026. Footprint Architects Ltd. Drawing No. 2425-FTP-XX-MSZZ-DR-A 2203. Rev. P03;
- Proposed East and West Elevations. 28 April 2026. Footprint Architects Ltd. Drawing No. 2425-FTP-XX-MSZZ-DR-A 2204. Rev. P03;
- Proposed Ground Floor Plan. 09 July 2026. Footprint Architects Ltd. Drawing No. 2425-FTP-XX-MSOO-DR-A 1006. Rev. P04;
- Existing Site Plan. 28 April 2026. Footprint Architects Ltd. Drawing No. 2425-FTP-XX-MSXX-DR-A Rev. P03;
- Existing Elevations. 28 April 2026. Footprint Architects Ltd. Drawing No. 2425-FTP-XX-MSZZ-DR-A 2200. Rev. P03
- Existing Ground Floor Plan. 09 July 2026. Footprint Architects Ltd. Drawing No. 2425-FTP-XX-MSOO-DR-A 1004. Rev. P04;
- Design and Access Statement. 28 April 2026. Footprint Architects Ltd. Project Ref. 7429. Doc No. 2425-FTP-XX-MSXX-RP-A-0004. Rev. P03.

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

The development lies within the outer zone of influence (4.2 – 9.4km) 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.

A test of likely significance has been carried out by the relevant Competent Authority (Wiltshire Council) as required by Regulation 63 Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. This concluded that given the nature of the development (no increase in dwellings) there is no mechanism for adverse effect/any temporary construction impacts and operational impacts would be de-minimus. The Habitat Regulation Assessment (HRA) has concluded that the application will not result in any mechanism for adverse effect on the conservation objectives of the SAC and subsequently is screened out of Appropriate Assessment.

Bat Species

Diversity Environmental Consultants Ltd assessed the buildings as having negligible potential for roosting bats, with the site offering suitability for foraging and commuting bats. The Ecological Survey report sets out precautionary working methods and recommends the inclusion of a Construction Environmental Management Plan, which is welcomed. The proposed new classroom block to replace the mobile building 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.

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.

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

- The Statutory Biodiversity Metric (28 April 2026. Iteration. 1) does not match Plan 1 Habitats (April 2026. Diversity Environmental Consultants Ltd. Drawing No. d595_003b), specifically the 'hedgerow' habitat within the habitat plan is not shown within the metric, and the 'mixed scrub' within the metric is not shown on the habitat plan. 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 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 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 Proposed Site Plan (09 July 2026. Footprint Architects Ltd. Drawing No. 2425-FTP-XX-MSXX-DR-A 1005. Rev. P04). 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.

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.

The Ecological Assessment proposes the inclusion of a bat boxes, bird boxes a bee hotel and hedgehog hibernation box which is welcomed. 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. 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). Bird/bat boxes will continue to be available for birds/bats for the lifetime of the development.

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: 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