

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jessica Cracknell
Date:	07/09/2026
Application Number:	PL/2026/00902
Proposal:	Outline application for the redevelopment of the site, following demolition of buildings, to provide up to 31no. dwellings with matters of Access, Layout, and Scale to be considered
Site Address:	Leonora Home, Wood Lane, Chippenham, SN15 3DY
Case Officer:	James Taylor

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	07/09/2026 Bat Inspection & Emergence Survey Report and bat emergence surveys were undertaken in May and Juen 2024 and is considered to be out of date. An updated Ecological Assessment/bat survey must be undertaken to determine the current status of the identified roosts within the site boundary.	NO
2	Biodiversity Net Gain (BNG)	Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021)	07/09/2026 Submission of statutory metric calculation with the correct baseline habitats, condition assessments and associated baseline habitat plans. (see comments in main text)	NO
3	Ecological Parameters Plan	CP50, NPPF	07/09/2026 Provision of a suitably detailed Ecological Parameters Plan (EPP). 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:

- Update Preliminary Ecological Appraisal and Biodiversity Net Gain Assessment. January 2026. Avondale Ecology. AE682. Rev. 1;
- Bat Inspection & Emergence Survey Report. July 2024. IES Consulting. Job No. IES/2023/152/Version 1.0. Rev. 001;
- The Statutory Biodiversity Metric. 02 February 2026. Iteration. 1;
- Baseline Habitat Plan. OpenStreetMap;
- Post-development Habitat Plan. OpenStreetMap;
- Condition Assessments. 05 January 2026;
- Arboricultural Report containing: Arboricultural survey sheets, Arboricultural constraints plan
- Illustrative Site Plan. 19 July 2025. Avec Design. Drawing No. 2316-003 E;
- Block Plans. 19 July 2025. Avec Design. Drawing No. 2316-002C;
- Block A – elevations. 19 September 2023. Avec Design. Drawing No. 2316-011B;
- Block B Elevations. 19 September 2023. Avec Design. Drawing No. 2316-014B;
- Block C – Elevations. 19 September 2023. Avec Design. Drawing No. 2316-017B;
- Block D Elevations. 19 September 2023. Avec Design. Drawing No. 2316-020C;
- Block E Elevations. 19 September 2023. Avec Design. Drawing No. 2316-23A;
- Design and Access Statement. 28th January 2026. Horizon Homes.

Protected Species

A Preliminary Ecological Appraisal (PEA) was undertaken in January 2026 in support of the application. The survey was completed at a sub-optimal time of year for botanical assessment and protected species surveys. The reports states that *“Previous bat survey work has not been replicated or updated. The scope of this report only relates to habitats present, the potential for the site to support protected or notable species and a Biodiversity Net Gain assessment based on the final detailed design”*.

The Bat Inspection & Emergence Survey Report including emergence surveys were undertaken between May and June 2024 and more than 20 months had lapsed at the time the current application was submitted. 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 accordance with the recommendations contained within the Update Preliminary Ecological Appraisal and Biodiversity Net Gain Assessment, the Bat Inspection & Emergence Survey Report, and CIEEM's guidance note, an updated bat survey is required to establish whether site conditions have changed.

The PEA states that *“Extensive bat surveys of the buildings were completed in 2024. Updating these is outside of the scope of this assessment.”* and *“The recommendations set out in Bat Inspection & Emergence Survey Report (IES, 2024) need to be followed. This includes update surveys during summer 2026 for licensing purposes.”* Results of these surveys must be submitted to the LPA for review. 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. If the applicant considers that the additional survey work is not required, this must be clearly justified with supporting evidence from a suitably qualified ecologist.

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.

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. Please see comments on the Ecological Parameters Plan below.

Biodiversity Net Gain (BNG)

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

Evidence of habitat degradation was identified prior to the botanical survey undertaken in January 2026, specifically relating to the removal of three trees that had previously been recorded within the Site. To establish an accurate baseline for the Biodiversity Net Gain assessment, the 2021 Arboricultural Survey, previous ecological survey data, aerial photography and evidence of retained tree stumps on site were reviewed. In accordance with Schedule 7A of the Town and Country Planning Act 1990 (as amended), the Statutory Biodiversity Metric has therefore been informed by the pre-degradation baseline, ensuring that the biodiversity value of the removed trees is reflected within the assessment. Policy GI5 *Trees, Woodlands and Hedgerows* of the Chippenham Neighbourhood Plan 2023-2038 seeks to protect and enhance trees, woodlands and hedgerows by retaining important arboricultural and ecological features wherever possible. The policy requires the protection of valuable trees and hedgerows in accordance with BS5837 and the provision of replacement planting where losses are unavoidable.

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	0.64 Habitat units
	0.49 Hedgerow units
	0.00 Watercourse units
Are there any irreplaceable habitats on-site?	No
Has any habitat degradation of occurred?	Yes (see comments above)

The condition assessment sheets for *all* the baseline habitats have not been submitted, including H2 'Non-Native and Ornamental Hedgerow' habitat. 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.

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:

- The Post-development Habitat Plan. OpenStreetMap, identifies habitat areas within the residential curtilage as contributing towards BNG. Only habitats outside of residential curtilage can count towards biodiversity net gain.

- Other neutral grassland 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.

Policy G11 *Protecting and Enhancing Biodiversity* of the Chippenham Neighbourhood Plan 2023-2038 seeks to ensure development protects and enhances biodiversity through the retention and enhancement of key ecological features, including trees, hedgerows, blue infrastructure and native habitats. The policy also encourages biodiversity-friendly design measures, such as integrated bird and bat boxes, wildlife-friendly fencing and green infrastructure, to deliver measurable ecological benefits.

The Update Preliminary Ecological Appraisal and Biodiversity Net Gain Assessment proposes the inclusion of bat tubes, bird bricks, and habitat piles which is welcomed. The locations of these features must be provided on site plan/elevation drawings (Block A – elevations. 19 September 2023. Avec Design. Drawing No. 2316-011B; Block B Elevations. 19 September 2023. Avec Design. Drawing No. 2316-014B; Block C – Elevations. 19 September 2023. Avec Design. Drawing No. 2316-017B; Block D Elevations. 19 September 2023. Avec Design. Drawing No. 2316-020C; Block E Elevations. 19 September 2023. Avec Design. Drawing No. 2316-23A) and will become an enforceable part of the planning permission. 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). Bird/bat boxes will continue to be available for birds/bats for the lifetime of the development.

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, etc
2. 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
3. Identify where new habitats will be created on site, include minimum area in hectares or length in metres and habitat type
4. Identify areas where habitat enhancement will be undertaken, include minimum area in hectares or length in metres and habitat type, e.g. defunct hedgerow to be grubbed up and replanted
5. 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.

IN 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