

## Wiltshire Council Planning Consultation Response

### ECOLOGY

|                            |                                                                                                                                                   |
|----------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Officer name:</b>       | Abi Gazzard                                                                                                                                       |
| <b>Date:</b>               | 24/09/2026                                                                                                                                        |
| <b>Application number:</b> | PL/2026/04365                                                                                                                                     |
| <b>Proposal:</b>           | The construction of a new 60 bed nursing home with associated landscaping and car parking facilities and the erection of 7 assisted living units. |
| <b>Site address:</b>       | Co-operative Food, Mill Street, Calne, SN11 0HT                                                                                                   |
| <b>Case officer:</b>       | Isobella Wise                                                                                                                                     |

### Recommendations:

|                                     |                                                |
|-------------------------------------|------------------------------------------------|
| <input type="checkbox"/>            | No Comment                                     |
| <input type="checkbox"/>            | Support                                        |
| <input type="checkbox"/>            | No objection                                   |
| <input type="checkbox"/>            | Condition (no objection subject to conditions) |
| <input checked="" type="checkbox"/> | Objection - further information required       |
| <input type="checkbox"/>            | Objection in principle                         |
| <input type="checkbox"/>            | HRA completed                                  |

### Further Information Required:

|    | Issue | Policy/Legislative Compliance                              | Date information requested & Further information required                                                                                                      | Satisfactorily addressed (Document & Date) |
|----|-------|------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|
| a) | BNG   | Town and Country Planning Order 2015, Environment Act 2021 | <b>24/09/2026</b><br>-MoRPH survey data sheets<br>-Photos of the surveyed river sections<br>-Confirmation that all proposed BNG is within the redline boundary |                                            |

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

### Information considered:

- Planning Statement, AGM, July 2026
- Design and Access Statement, bba Architects and Planners, undated
- Location Plan, bba Architects and Planners, July 2026, Rev C
- Proposed Site Plan, bba Architects and Planners, July 2026, Rev H
- Biodiversity Net Gain Assessment, Wessex Ecology, July 2026
- Statutory Biodiversity Metric, Darrelle Moffat, July 2026
- Preliminary Ecological Appraisal Survey Report, Daniel Ahern Ecology, November 2025

The site comprises a former Co-op food store, where it is proposed to create a care home and assisted living units. The demolition of the store was approved under PL/2025/02050.

## **COMMENTS:**

### **Protected species and habitats**

The site contains a section of the River Marden through the centre and along the east. There are two existing footbridges over said river in the central section, that fall within the redline boundary. The existing building and proposed development footprint fall within 8-10m of the river at numerous points.

The River Marden comprises a Priory Habitat and is likely an important commuting/foraging area for wildlife within its urban location. There are multiple records of water vole and otter associated with this watercourse within 110m of the site, however, no signs of these species were observed during site surveys in 2022 or 2025. Also within the vicinity are historical bat roost records, and more recent records of bat passes. Bat emergence surveys of the building to be demolished (undertaken in 2022) found no evidence of roosting bats, and the updated 2025 walkover survey also recorded no new evidence. The building is now assessed as having negligible potential to host roosting bats due to its derelict condition, increasing levels of anti-social disturbance and lack of new bat evidence or roosting features. As per PL/2025/02050 and subsequent discharge of condition, the building's demolition must be carried out in accordance with the approved Construction Environmental Management Plan (CEMP) and precautionary mitigation measures. **A CEMP will also be required for the construction of the care home, and it should include measures to minimise the risk posed to the river, otter, water vole and bats.**

The river is considered too fast flowing to provide suitable breeding habitat for great crested newts. However, the scrub and river edge may provide suitable habitats for common amphibians and reptiles. Immediately prior to any vegetation removal, the ecology report therefore recommends that a fingertip search is undertaken. Full details of this measure, and other precautionary measures for herpetofauna (e.g., the careful removal of piles of rubble/other habitats, sensitive work timings, river buffer zones, etc.), must be included within the CEMP.

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 GN08-18 "Bats and artificial lighting in the UK", issued by the Bat Conservation Trust and Institution of Lighting Professionals. **A wildlife-sensitive lighting scheme should be secured via a condition.**

In line with the NPPF and with CP50, applications must ensure that gains for biodiversity, relevant to local habitats and wildlife populations, should form part of the proposed development. **As such, ecological enhancements – such as provisions for invertebrates, bats, birds, the river and associated species – should be secured via a condition.**

### **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, area habitat condition assessments and maps (Biodiversity Net Gain Assessment, Wessex Ecology, July 2026; Statutory Biodiversity Metric, Darrelle Moffat, July 2026) calculating the baseline and predicted post- development biodiversity units of the site have been submitted. The pre-development (baseline) situation is summarised below.

|                                                               |                        |
|---------------------------------------------------------------|------------------------|
| On-site pre-development (baseline) biodiversity value         | 0.88 Habitat units     |
|                                                               | 0.00 Hedgerow units    |
|                                                               | 0.47 Watercourse units |
| Are there any <a href="#">irreplaceable</a> habitats on-site? | No                     |
| Has any habitat <a href="#">degradation</a> of occurred?      | No                     |

As the development and site boundary crosses into the riparian zone of River Marden (defined in the BNG [User Guide](#) as 10m from the bank top), the corresponding watercourse has been included in the watercourse module of the submitted metric as appropriate. To aid review of the watercourse assessment, the following points should be addressed:

- The MoRPH survey spreadsheets and photos should be provided
- It is proposed to enhance the watercourse by reducing encroachment via the removal of hardstanding/buildings, and by adding new plantings, in the riparian zone. Please can a statement be provided confirming that this will be conducted within the redline boundary (*works outside of the redline boundary would need to be secured via a legal agreement*)?

The proposed on-site BNG is considered 'significant' due to:

- the scale and nature of the application (major);
- overall units required (0.97 habitat units and 0.51 watercourse units), and
- the BNG proposed (including watercourse enhancement, and medium distinctiveness area habitats of other neutral grassland, mixed scrub and trees).

**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.

The BNG monitoring contribution fee for major applications is set at £12,000 to monitor on-site BNG obligations for 30 years. However, it is acknowledged that although this application is major, many of the proposed habitat types and habitat conditions are not likely to involve highly challenging/technical management. Therefore, **in order for the council to fulfil its monitoring obligations, the BNG monitoring fee for this development would be £6,200 plus legal fees payable on commencement of development.**

***IN SUMMARY: Whilst there is not an ecology objection to the principle of development at this site, some BNG information remains outstanding. The information outlined above***

***should be submitted and reviewed by the LPA's ecology team prior to determination of the application.***

**DRAFT CONDITIONS:**

**1. Construction Environmental Management Plan**

Prior to the commencement of works, including demolition, site clearance, and vegetation clearance, a Construction Environmental Management Plan (CEMP) shall be submitted to the local planning authority for approval in writing. The Plan shall provide details of the avoidance, mitigation and protective measures to be implemented before and during the construction phase, including but not necessarily limited to, the following:

- Identification of ecological protection areas/buffer zones and tree root protection areas and details of physical means of protection, e.g. exclusion fencing.
- Working method statements for protected/priority species, such as otter, water vole, nesting birds, bats, amphibians and reptiles.
- Working method statement for the River Marden priority habitat stating how pollution of the watercourse will be prevented during the works
- Work schedules for activities with specific timing requirements in order to avoid/reduce potential harm to ecological receptors; including details of when a licensed ecologist and/or ecological clerk of works (ECoW) shall be present on site
- Key personnel, responsibilities and contact details (including Site Manager and ecologist/ECoW).

Development shall be carried out in strict accordance with the approved CEMP.

REASON: To ensure adequate protection and mitigation for ecological receptors prior to and during construction, and that works are undertaken in line with current best practice and industry standards and are supervised by a suitably licensed and competent professional ecological consultant where applicable.

**2. Habitat Management and Monitoring Plan (HMMP)**

No development shall commence on site until a Habitat Management and Monitoring Plan (the HMMP), prepared in accordance with the statutory Biodiversity Gain Plan and including: a non-technical summary;

- the roles and responsibilities of the people or organisation(s) delivering the HMMP;
- the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the statutory Biodiversity Gain Plan and schedule for implementation;
- the management measures to maintain habitat in accordance with the statutory Biodiversity Gain Plan for a period of 30 years from the completion of development; and
- the monitoring methodology and specification of a Monitoring Pack (to include but not exclusively up to date Management Actions Logs, Habitat Condition Assessment Reports, metric calculation; and corresponding post intervention Habitat Map) which shall be submitted to the Local Planning Authority in years 2 (two) 5 (five) 10 (ten) 15 (fifteen) 20 (twenty) and 30 (thirty) of the Maintenance Period,

has been submitted to, and approved in writing by, the local planning authority. The created and/or enhanced habitat shall be managed and maintained in accordance with the statutory HMMP at all times thereafter.

REASON: To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990.

**3. External lighting**

No external light fixture or fitting will be installed within the application site unless details of 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 sensitive habitats – including the River Marden priority habitat – and species, 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 wildlife-sensitive habitats, including habitat used by bats.

#### **4. Enhancements for biodiversity**

Prior to the commencement of any works, including vegetation removal and demolition, details of the number, design and locations of ecological enhancement features, including opportunities for bats, birds (e.g., bat and bird boxes), invertebrates and other wildlife, shall be submitted to the local authority for approval. The approved details shall be implemented for the lifetime of the development and before completion of the final works.

REASON: To provide mitigation/enhancement for biodiversity.

**Sign off by WC Ecologist will only be given once ALL outstanding information has been submitted and agreed sufficient.**

|                  |             |
|------------------|-------------|
| <b>Ecologist</b> | <b>Date</b> |
|------------------|-------------|