

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jessica Cracknell
Date:	30/09/2026
Application Number:	PL/2026/04774
Proposal:	Variation of conditions 1, 2, 3, 6, 7 and 8, and removal of condition 9 of PL/2025/04414 to allow minor amendments to plot layouts and accommodate revised house types following the acquisition of the site by Bellway
Site Address:	Land off Melksham Road, Great Parks, Holt, BA14 6QP
Case Officer:	Julie Mitchell

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	Site Layout and Ecological Parameters Plan	NPPF, CP50, Habs Regs	30/09/2026 Amend the layout to ensure the approved 20-50m bat corridor buffer remains free from built development and associated infrastructure, and demonstrate compliance with the Ecological Parameters Plan and ecological mitigation strategy secured through the outline permission and Reserved Matters approval (see comments in main text)	NO
2	Great Crested Newt (GCN)	Habs Regs, WCA, CP50	30/09/2026 Submission of a revised GCN DLL IACPC where required; or written confirmation from Natural England that the existing GCN DLL IACPC remain valid and adequately address the revised baseline conditions, including the newly recorded on-site Great Crested Newt population; or	NO

			submission of an appropriate mitigation strategy demonstrating how impacts to Great Crested Newts will be addressed in revised scheme (see comments in main text)	
3	Landscape and Ecological Management Plan (LEMP)	NPPF, CP50, Habs Regs	30/09/2026 Updated elevations plans/drawings showing number and type of enhancement measures previously shown on plans within LEMP (see comments in main text)	NO
4	Lighting	NPPF, CP50, Habs Regs	30/09/2026 Lighting strategy must demonstrate that the approved 20-50m bat corridor buffer will remain unlit, with illumination not exceeding 0.5 lux and no lighting columns located within the ecological buffer (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:

- Land at Holt, Melksham Road – Drawing Schedule 22072026 v1. Bellway;
- Technical Note: Ecology Walkover and Constraints Summary. 18 May 2026. FPCR Environment & Design Ltd. J12541/IRM/PJP;
- *Technical Note: Ecology Walkover and Constraints Summary. 12 June 2025. FPCR Environment & Design Ltd. J12451. Rev. F/PJP/MEL/AU. provided at reserved matters under Wiltshire Council planning reference PL/2025/04414;*
- *Ecological Impact Assessment. 13 February 2023. FPCR Environment & Design Ltd. Rev. 7. provided at outline permission under Wiltshire Council planning reference PL/2022/03315;*
- *Ecological Parameters Plan. 13 February 2023. FPCR Environment & Design Ltd. Drawing No. Figure 16. Rev. 10545-E-01. provided at outline permission under Wiltshire Council planning reference PL/2022/03315;*
- Construction & Ecological Management Plan (CEMP: Ecology). 05 May 2026. FPCR Environment & Design Ltd. Rev. A;
- *Construction and Ecological Management Plan: Ecology. 08 July 2025. FPCR Environment & Design Ltd. Rev. C). secured under discharge of condition under Wiltshire Council planning reference PL/2025/06062;*
- Landscape & Ecological Management Plan (LEMP). 21 May 2026. FPCR Environment & Design Ltd. Rev. C;
- *Landscape & Ecological Management Plan. 07 July 2025. FPCR Environment & Design Ltd. Rev. B. secured under s106 for the outline permission Wiltshire Council planning reference PL/2022/03315 and Planning Appeal reference APP/Y3940/W/23/3315432;*
- S38 Street Lighting Design Sheet 1 of 1. 09 June 2026. MMA Lighting Consultancy. Drawing No. MMA20388/001. Rev. R1;
- Outdoor Lighting Report. 09 June 2026. MMA Lighting Consultancy Ltd. Project No. MMA20388;

- *Private Lighting. 24 July 2025. SolarVision. Project No. LP0132. secured under discharge of condition under Wiltshire Council planning reference PL/2025/06630;*
- *Horizontal Illuminance (lux). 24 July 2025. SolarVision. Project No. LP0132. secured under discharge of condition under Wiltshire Council planning reference PL/2025/06630;*
- Proposed Soft Landscape Proposals. 04 June 2026. James Blake Associates. Drawing No. JBA 26/063 05. Rev. K;
- Proposed Soft Landscape Proposals. 04 June 2026. James Blake Associates. Drawing No. JBA 26/063 06. Rev. K;
- Proposed Soft Landscape Proposals. 04 June 2026. James Blake Associates. Drawing No. JBA 26/063 07. Rev. K;
- Proposed Soft Landscape Proposals. 04 June 2026. James Blake Associates. Drawing No. JBA 26/063 08. Rev. K;
- Proposed Soft Landscape Proposals. 04 June 2026. James Blake Associates. Drawing No. JBA 26/063 09. Rev. K;
- Reserved Matters General Arrangement. July 2026. Abley Letchford. Drawing No. HD089-RMB-10. Rev. D;
- Site Layout. 09 July 2026. Pegasus Group. Drawing No. P26-1118_DE_01_J_02;
- Arboricultural Technical Note: Section 73 application for Land off Melksham Road, Holt. 01 June 2026. Barton Hyett Associates.

The application seeks to vary Conditions 1, 2, 3, 6, 7 and 8 and remove Condition 9 of Reserved Matters approval PL/2025/04414. Condition 1 is of relevance to ecology. The revised plans and supporting ecological information submitted pursuant to Condition 1 introduce a number of changes affecting the approved ecological mitigation strategy secured through the outline permission, Reserved Matters approval and associated discharge of condition approvals. These matters are discussed in detail below.

Site Layout and Ecological Parameters Plan

The submitted layout has been reviewed against the Ecological Parameters Plan (13 February 2023. FPCR Environment & Design Ltd. Drawing No. Figure 16. Rev. 10545-E-01) provided at outline. The Plan identifies the south-eastern boundary as a bat commuting corridor, requiring a 20-50m greenspace buffer to remain unlit in order to maintain its function as a commuting and foraging route for bats. The approved ecological mitigation strategy relies upon the retention of this undeveloped buffer and associated habitat management to maintain habitat connectivity. The amended layout introduces residential development and lighting infrastructure in close proximity to the corridor. Review of the submitted Reserved Matters General Arrangement (July 2026. Abley Letchford. Drawing No. HD089-RMB-10. Rev. D) also indicates that parts of the proposed dwellings extend within the approved buffer area, this is inconsistent with the approved Parameters Plan and the ecological mitigation secured through the outline permission. **The layout must be amended to ensure the approved buffer remains free from built development and continues to function as an effective bat commuting and foraging corridor. Further comments regarding the impacts of the proposed lighting scheme on the bat corridor are provided below.**

Further comments will be provided on the Section 73 application and amended layout once the outstanding ecological concerns identified within this response have been satisfactorily addressed and the additional information requested has been submitted and reviewed by the Council's Ecology Team. At present, insufficient information has been provided to demonstrate compliance with the ecological mitigation strategy secured through the outline permission and subsequent Reserved Matters approval.

Updated Ecology Survey

The submitted Technical Note: Ecology Walkover and Constraints Summary (18 May 2026. FPCR Environment & Design Ltd. J12541/IRM/PJP) provides an update to the ecological baseline based on a May 2026 walkover survey. The updated assessment confirms that site conditions remain broadly consistent with those previously assessed; however, a newly established pond has developed within the site following remedial works. Subsequent eDNA testing has confirmed the presence of Great Crested Newt within this waterbody. The submitted information does not identify any other significant changes to the protected species baseline previously considered.

The applicant has previously applied to Natural England to licence the development under the Great Crested Newt District Level Licensing Scheme and a signed and countersigned Impact Assessment Conservation Payment Certificate (IACPC) was submitted and accepted during determination of the outline application. The updated ecological information demonstrates a material change in baseline conditions, with the subsequent establishment of a pond supporting Great Crested Newt within the application site. The submitted Technical Note states that consultation with Natural England will be undertaken to determine whether any amendment to the existing District Level Licence arrangements is required.

Clarification is required prior to determination confirming either:

- **that the existing signed and countersigned IACPC and associated District Level Licence arrangements remain valid and sufficient to address the revised baseline conditions, including the newly recorded on-site Great Crested Newt population, including confirmation from Natural England; or**
- **where required, submission of an updated signed and countersigned IACPC (including ANNEX 3) reflecting the revised Great Crested Newt baseline conditions and amended development proposals; or**
- **submission of an alternative mitigation strategy demonstrating how impacts to Great Crested Newts will be appropriately addressed.**

Until this information has been provided, it cannot be verified that the current proposal remains covered by the existing Great Crested Newt District Level Licensing arrangements or that Natural England has confirmed the appropriate mechanism in light of the updated baseline conditions. This information is therefore required prior to determination of the application.

Construction and Ecological Management Plan (CEMP)

The submitted Construction & Ecological Management Plan (CEMP: Ecology) (05 May 2026. FPCR Environment & Design Ltd. Rev. A) has been reviewed against the previously approved Construction and Ecological Management Plan: Ecology (08 July 2025. FPCR Environment & Design Ltd. Rev. C). The revised CEMP incorporates updated baseline ecological information, including the findings of the May 2026 walkover survey, and updates a number of ecological protection and management measures previously approved for the site. Subject to confirmation of the Great Crested Newt licensing position, no further comments are raised in relation to the submitted CEMP.

Landscape and Ecological Management Plan (LEMP)

The submitted Landscape & Ecological Management Plan (LEMP) (21 May 2026. FPCR Environment & Design Ltd. Rev. C) has been reviewed against the previously approved Landscape & Ecological Management Plan (07 July 2025. FPCR Environment & Design Ltd. Rev. B) and associated ecological information secured through the outline permission, Reserved Matters approval and Section 106 agreement.

The updated LEMP continues to identify ecological enhancement measures on the Ecological Enhancements Plan, including bat boxes, bird boxes, hedgehog houses and reptile hibernacula. However, the locations of integrated swift bricks are no longer identified on enforceable elevation plans. **In accordance with Core Policy 50 and the National Planning Policy Framework, ecological enhancements must be clearly identified on enforceable plans. Updated site plans and house-type elevation drawings identifying the location, number and type of proposed swift bricks must therefore be provided to ensure the biodiversity enhancements secured through the outline permission, Reserved Matters approval and Section 106 agreement remain deliverable and enforceable.**

Lighting

The submitted S38 Street Lighting Design Sheet 1 of 1 (09 June 2026. MMA Lighting Consultancy. Drawing No. MMA20388/001. Rev. R1) and Outdoor Lighting Report (09 June 2026. MMA Lighting Consultancy Ltd. Project No. MMA20388) has been reviewed against the previously approved lighting strategy (Private Lighting. 24 July 2025. SolarVision. Project No. LP0132. and Horizontal Illuminance (lux). 24 July 2025. SolarVision. Project No. LP0132) submitted pursuant to the discharge of the lighting condition (Wiltshire Council planning reference PL/2025/06630) attached to the outline permission (Wiltshire Council Planning reference: PL/2022/03315 and Planning Appeal reference APP/Y3940/W/23/3315432), together with the Ecological Parameters Plan (13 February 2023. FPCR Environment & Design Ltd. FPCR Environment &

Design Ltd. Drawing No. Figure 16. Rev. 10545-E-01) and the submitted Landscape & Ecological Management Plan (LEMP) (21 May 2026. FPCR Environment & Design Ltd. Rev. C).

The Ecological Parameters Plan and the Ecological Enhancements Plan (20 May 2026, FPCR Environment & Design Ltd, Figure 1 Rev. D) within the submitted LEMP identify the south-eastern boundary of the site as a bat commuting corridor, requiring a 20-50m wide greenspace buffer to remain unlit to maintain its function as a bat commuting and foraging route. The updated S38 lighting scheme and lighting report does not accord with the approved ecological design strategy. The revised layout introduces additional lighting columns within the approved buffer and demonstrates light spill into the corridor. The submitted lighting contours indicate illumination of parts of the corridor at 0.5 lux and above, and it has therefore not been demonstrated that the corridor will remain unlit in accordance with the Ecological Parameters Plan and ecological mitigation strategy. The revised layout also results in residential development being moved closer to the approved bat corridor. Whilst the submitted lighting information assesses the proposed street lighting, it does not appear to consider the in-combination effects of light spill from the proposed dwellings themselves, including windows, glazed doors, domestic security lights, porch lights, garden lighting and other sources of residential illumination. The encroachment of housing into closer proximity with the corridor is therefore likely to increase artificial lighting levels beyond those currently assessed and has the potential to further impact the functionality of the dark corridor.

The current proposal conflicts with Core Policy 50 of the adopted Wiltshire Core Strategy 2015 and Chapter 19 sections N2 and N6 of the National Planning Policy Framework August 2026, as the mitigation previously secured has not been adhered to within the section 73 application proposal. The lighting strategy must therefore be amended to demonstrate compliance with the approved Parameters Plan, the submitted LEMP, and the ecological mitigation secured under the outline permission and Reserved Matters approval, including the retention of the approved 20-50m unlit buffer and illumination levels of no greater than 0.5 lux along retained bat commuting and foraging habitat. 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.

Biodiversity Net Gain

From 12 February 2024 Biodiversity Net Gain (BNG) became mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Based on the information available the biodiversity gain planning condition is not considered to apply to this application as the application was made under section 73 of the Town and Country Planning Act 1990 and the original planning permission to which the section 73 planning permission relates was granted before 12 February 2024

Note to case officer: you should be satisfied that the proposals meet the above criteria and act accordingly. Further information will be required from the applicant prior to determination in the event the application is considered to be subject to mandatory biodiversity net gain.

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