Noctua Ecology Ltd
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Pill, Bristol, BS20 0FF

Wiltshire Council
Bythesea Road
Trowbridge
Wiltshire
BA14 8JN

3rd December 2023

To whom it may concern,

RE: Wildcross, South Wraxhall

I am writing to address the requirement for further information regarding the proposed works at Wildcross, South Wraxhall, Bradford on Avon, Wiltshire, BA15 2RL, application number PL/2023/07242 (hereafter referred as the "site").

Background to the activity

Church Farm Developments were seeking planning permission to demolish the existing bungalow, workshop, and sheds to construct four new residential dwellings. The new residential dwellings comprised a mix of three two-storey houses and one bungalow. The dwellings, associated driveways, parking spaces and gardens comprised the entire footprint of the site and would result in the loss of some garden habitats and hard surfacing within the existing site.

A planning application was submitted to Wiltshire Council in August 2023. An *Ecological Appraisal and Biodiversity Net Gain Assessment* (Noctua Ecology 2023) report was prepared and included within the planning application. A response was returned by Wiltshire Council with objections on 5th October 2023. It is currently understood that the Scheme is being re-designed by LPC Town and Country Planning Development Consultants and will be re-submitted via a new application once design is complete. However, it was still deemed appropriate to address any transferrable ecological issues highlighted by the council in the original submission. As such, this letter proposes solutions to most issues regarding Bats and Mitigation stated within the Wiltshire Council Planning Consultation Response (05/10/2023). Any issues which cannot be fully resolved at this point will be addressed during the development of the new design.

Issues and proposed solutions

Wildlife Mitigation and Enhancement Scheme

Issues

1. The hedgerow along the southern boundary is considered likely to provide a navigation and foraging resource for horseshoe bats. Design changes are required to ensure that the retained vegetation will be protected and remain available for use by commuting and foraging bats, including light sensitive species.

2. It may be necessary to explore locating a horseshoe night roost outside of the redline application boundary (but within the ownership boundary if possible) away from potential human disturbance. This would need to be shown on an enforceable drawing and secured appropriately.

3. Details are required of any external lighting proposed within the site and how this could impact the use of the site by bats, including the use of the proposed mitigation.

Solutions

1. A new vertically boarded fence will be constructed alongside the northern elevation of the hedgerow (Figure 8). The hedgerow will be moved outside of the residential curtilage to ensure that future residents cannot remove or modify it. The new fence will be a minimum of 2m in height and will be located a minimum of 0.5m from the hedgerow edge. The new fence will be supported on concrete or metal posts to ensure long-term enforceability. This fence will protect the hedgerow from light spill from the ground floor glazed windows and doors of Plot 2, 3 and 4 through creating a dark corridor on top and behind the hedgerow.

   All first-storey windows located on the southern elevations of the proposed dwellings will be minimised within the new design (Currently under development by LPC Town and Country Planning Development Consultants). Where windows are necessary, they will be constructed and located in a way which will appropriately mitigate any significant light spill on to the adjacent hedgerow, ensuring the bat corridor remains dark for use by light sensitive bat species.

2. The proposed lesser horseshoe night roost shed (hereafter known as the 'bat shed') will be relocated to the southwest portion of the site (Plot 2), further away from the house than its original location (Figure 8). The new fence will extend in front of the shed, creating an area to house the shed, and offering a direct flight line from the hedgerow. The area will be large enough to house the shed, and a minimum of 2m will be maintained between the shed, fence and hedgerow. This area will be excluded from the development and re-located outside of the residential curtilage. In the long term, this area will be kept scrub-free, and annual long-term maintenance will likely be required as part of the bat licence. This will be shown on an enforceable drawing and secured appropriately within the new design (Currently under development by LPC Town and Country Planning Development Consultants).

3. No external lighting is proposed within the design. The bat shed will be relocated to the southwest portion of the site (Plot 2), approximately 16m from the dwelling; therefore, any internal light spill from windows at this distance is considered to be minimal (Figure 8). In addition, the new fence will further protect the bat shed from any residual internal light spill. Any internal light spill from windows on to the access point of the new lesser horseshoe night roost roof void, or the various other integrated bat boxes throughout the plots will be avoided or mitigated appropriately within the new design.

Mitigation to be shown on elevations drawings

Issues and solutions

1. During the development of the new design features for bats and birds will be shown on elevation drawings to demonstrate that there is sufficient space to incorporate each feature in the location proposed.

2. The relevant details regarding the features (e.g., dimensions of any opening, any internal features, and/or make/model of the feature) are detailed below on Figure 6 and 8. This information will be translated on to the site and elevation drawings produced by LPC Town and Country Planning Development Consultants during the development of the new design.

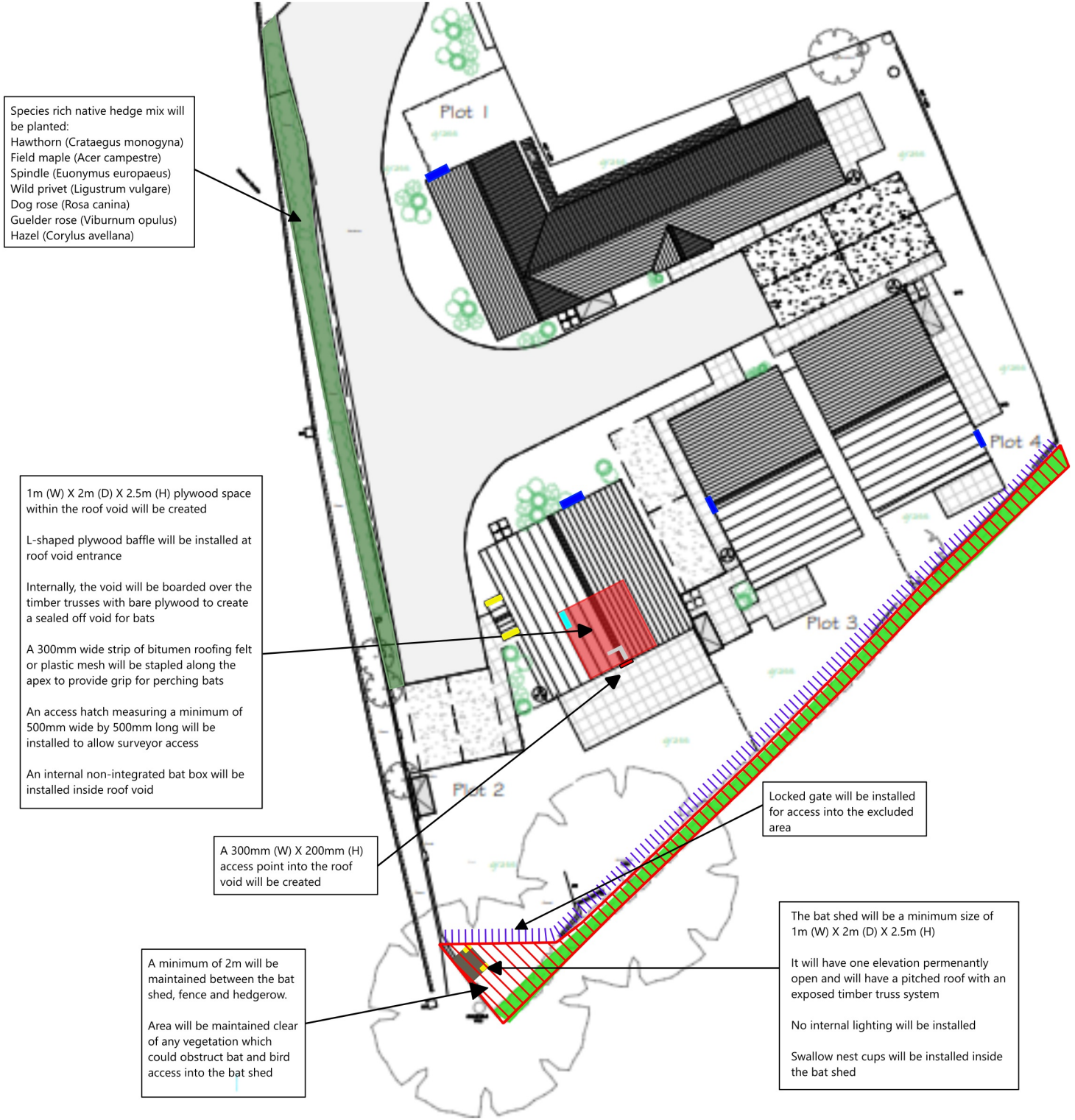
If you require any further information, please do not hesitate to contact me.

Kind regards,



Sunny Jones
Senior Ecologist

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Email: sunnyjones@noctua-ecology.co.uk



REFERENCE

Figure 8

TITLE

Site bat and bird compensation plan

LEGEND

- Bat roof void
- Bat shed
- Integrated bat box (Vivara Pro Build-in WoodStone)
- Non-integrated bat box (1FF Schwegler)
- Swallow nest cup (nhbs Eco Swallow Nest)
- Exclude from the residential curtilage
- Retain hedgerow - Bat corridor
- New hedgerow
- New fence

DRAWING INFORMATION

Project: 43a Wildcross
South Wraxhall
Project reference: P046
Version: 1.0
Date drawn: 24/11/2023
Drawn by: Sunny Jones
Notes: Not to scale.
Drawings provided by LPC (Trull) Ltd

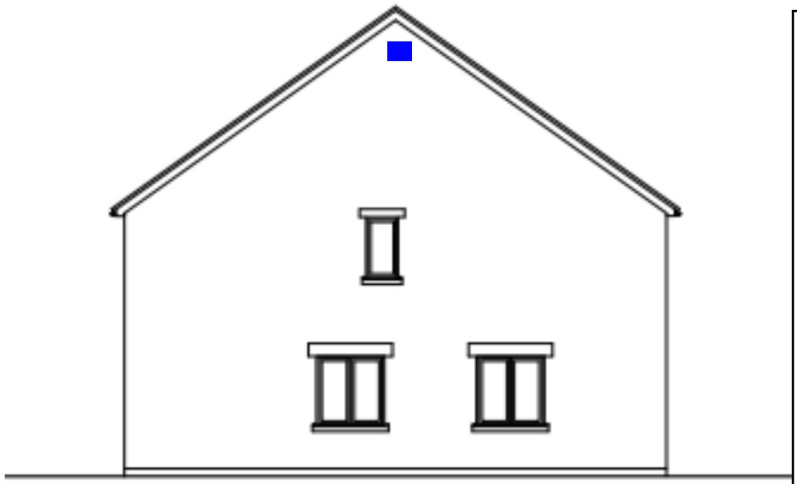
No external lighting will be installed throughout the site

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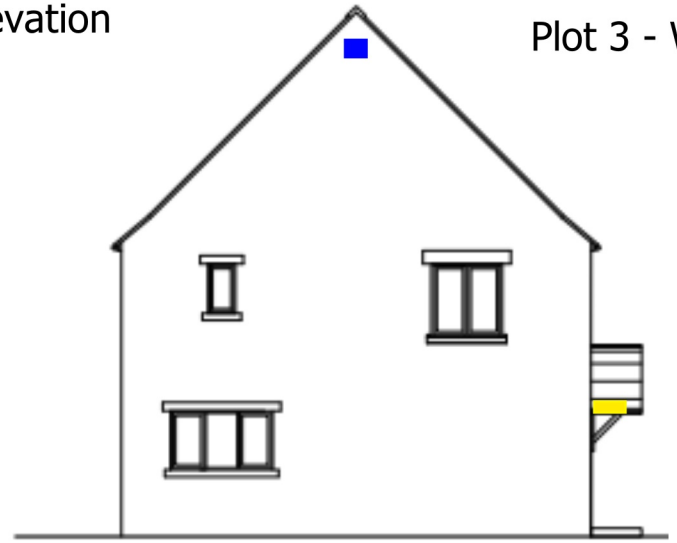
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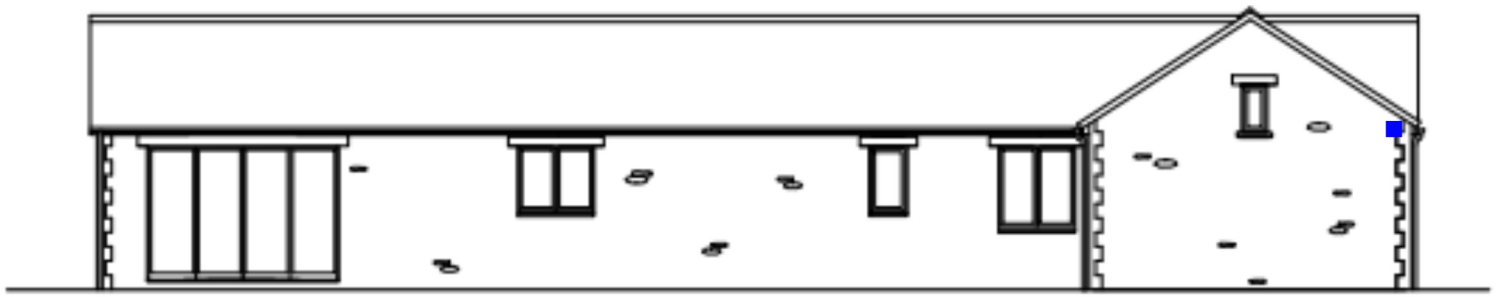
Plot 4 - Eastern Elevation



Plot 3 - Western Elevation



Plot 2 - Northern Elevation



Plot 1 - Northern Elevation

REFERENCE

Figure 6

TITLE

Bat and bird compensation plan Plot 1-4

LEGEND

- Integrated bat box (Vivara Pro Build-in WoodStone)
- Swallow nest cup (nhbs Eco Swallow Nest)

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Project reference: P046
Version: 1.1
Date drawn: 24/11/2023
Drawn by: Sunny Jones
Notes: Not to scale.
Drawings provided by LPC (Trull) Ltd

No external lighting will be installed throughout the site

The integrated bat box entrance will be a minimum of 30mm wide by 20mm high

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