Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Rachel Whyte
Date:	13/08/2024 20/12/2024 24/02/2025
Application number:	PL/2024/00113
Proposal:	Proposed conversion of existing redundant barns into Cookery School to include 3 no. holiday lets and reinstatement of open fronted barn
Site address:	Clatford Hall, Lockeridge Lane, Clatford, Marlborough, SN8 4EB
Case officer:	Meredith Baker Steven Sims

Recommendations:

	No comment
	Support
	No objection
X	Condition (no objection subject to conditions)
	Objection - further information required
	Objection in principle
	HRA completed

Further Information Required:

	Issue	Policy/Legislative Compliance	Date Information Requested & Further Information Required	Satisfactorily Addressed (Document & Date)
1.	Bats	Habs Regs.	**13/08/2024** - Re-design of the proposed bat loft or sufficient justification of its viability. Details of bat mitigation to be shown on architects' drawings.	**YES 20/12/2024** 1. Paragraph 5.9 of the Ecological Impact Assessment (Rev D). 2. Proposed Floor Plan (drawing no: 1861-051)
2.			**13/08/2024** – Confirmation on whether trees to be impacted by the proposals have potential for roosting bats. The response should be supported by sufficient evidence.	**YES 24/02/2025** 3. Email from Richard Nares (planning agent) to Steven Sims (case officer) dated 18 February 2025.

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 and aerial photography of the site and surrounding area, together with GIS layers of statutory and non-statutory sites and existing records of protected species.

The application is supported by an Ecological Impact Assessment by Wildwood Ecology. I consider that the level of survey has been thorough and appropriate to both the nature of the site and the scale of the development.

The ecology surveys of the buildings on-site confirmed the presence of nesting birds (house martin), roosting barn owl and roosting bats (Five day-time bat roosts of brown long-eared bats (maximum count x2 bats), common pipistrelle (x1 bat), Natterer's (droppings; likely x1 bat) and soprano pipistrelle (x1 bat)). **A European Protected Species (EPS) bat Mitigation Licence will need to be obtained for the lawful construction of this development.** Mitigation for the loss of bat roosts has been proposed, the proposed bat loft is considerably smaller than the recommended size for bat lofts and justification for this has not been provided. Furthermore, it has not been shown that the recommendations can be sufficiently and appropriately included within the development design. In carrying out its statutory function the LPA needs to be reasonably sure that the proposed development will not result in adverse impact to protected habitats and species and that the necessary licence is likely to be forthcoming from Natural England. This information is required prior to determination of the application. A justification for the proposed bat loft size has been provided in Paragraph 5.9 of the Ecological Impact Assessment (Rev D), this is accepted. The Proposed Floor Plan (drawing no: 1861-051) has been updated to include the location of the bat loft.

The Ecological Impact Assessment contains insufficient information to determine potential impacts on the following ecological features:

- Bat roosts in trees. The Landscape Strategy indicates that two trees will be removed, and two trees will be moved, however it does not appear as though these trees have been assessed for potential bat roosting opportunities. This information does not appear to have been provided in the updated report. **Please Note: When resubmitting a revised document, ALL changes must be highlighted to enable review.**

  It has been confirmed via email (Richard Nares (planning agent) to Steven Sims (case officer) dated 18 February 2025) that the proposals have been amended, and no trees require removal. No further information regarding trees is therefore required.

The ecology report makes a series of recommendations in Section 5 for precautionary measures to be implemented as part of the development, to ensure that sensitive ecological features are not adversely impacted by the works. These include a pre-works check for badger, hedgehog, and nesting birds (including barn owl). Supervision by Ecological Clerk of Works (ECoW) will be required for the bat licence roof works

Core Policy 50 of the Wiltshire Core Strategy requires all development to demonstrate no net loss of local biodiversity resource and to secure the integrity of local ecological networks. Core Policy 50 also requires development to seek opportunities to enhance biodiversity, whilst the NPPF encourages applications to deliver measurable net gains (para 186 d).

Artificial Lighting

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.

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 this permission is considered to be one which will not require the approval of a biodiversity gain plan by the Local Planning Authority (Wiltshire Council) before development is begun because the application for planning permission was made before 12 February 2024.

CONDITIONS:

1. The development will be carried out in strict accordance with the following documents:
    - Ecological Impact Assessment Report. ref: WWE20215/EcIA/Rev_ D.
    - Landscape Statement. Rev B November 2024.
    - Proposed Elevations 1. Drg no: 1861-052 E.
    - Proposed Elevations 1. Drg no: 1861-053 F.
    - Proposed Floor Plans. Drg no: 1861-051 G.

    REASON: For the avoidance of doubt and for the protection, mitigation and enhancement of biodiversity.

2. All lighting provided on site shall 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 and will demonstrate that bat habitat (trees, scrub and hedgerows) on the perimeter of the site will remain below 0.5 lux (or no higher than existing).

    REASON: In the interests of the amenities of the area and to minimize impacts on biodiversity caused by light spillage to areas above and outside the development site.

3. The roost and access point opportunities for bats, as detailed in Section 5 and Appendix III – IV in the submitted Ecological Impact Assessment Report (ref: WWE20215/EcIA/Rev_ D), shall be implemented prior to the completion of the development hereby permitted under the supervision of an appropriately qualified ecologist. The details shall be maintained in for the lifetime of the development, unless otherwise agreed in writing by the Local Planning Authority.

    REASON: To mitigate for impacts to bats arising from the development.

Final sign off – all matters addressed:

Ecologist **Rachel Whyte**	Date **24/02/2025**