

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jenna Buss
Date:	15/09/2025
Application number:	PL/2024/05527
Proposal:	Redevelopment of site to deliver extension to existing Spring Park data centre campus consisting of (a) free standing data centre building (b) energy, power, and water infrastructure (c) site access and internal roads (d) site security arrangements (e) diverted Public Rights of Ways (f) hard and soft, green and blue, landscaping and (g) other ancillary and auxiliary forms of development
Site address:	Land South of Westwells Road, Westwells Road, Neston, SN13 9GB
Case officer:	Adam Madge

Recommendations:

☐	No Comment
☐	Support
☐	No objection
☐	Condition (no objection subject to conditions)
☒	Objection - further information required
☐	Objection in principle
☒	HRA completed/required

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date)
1	No net loss of local biodiversity resource (bat commuting habitat) in relation to the Bath and Bradford on Avon Bat SAC	NPPF, CP50, Habitat Regulations	Evidence demonstrating functionality of the site for bats will be maintained. Planting/Landscaping Timetable A plan with dark corridors along key bat habitat/ corridors clearly identified.	No 15/09/2025 Supplementary Ecological Information Report. December 2024. Tyler Grange External Lighting Report. October 2024. JCA

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.

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 following submitted documentation was reviewed to inform this response:

- Ecological Impact Assessment. June 2024. Tyler Grange;
- External Lighting Report. October 2024. JCA
- Statutory Biodiversity Metric. June 2024. Tyler Grange
- Proposed Site Plan HAL-SPP6-SW-XX-DR-A-000007. May 2024. Hale Architecture
- Proposed Masterplan HAL-SPP6-SW-XX-DR-A-000006. May 2024. Hale Architecture
- Detailed Soft Landscaping Plan. April 2024. EDP
- Shadow Habitat Regulations Assessment. June 2024. Tyler Grange
- Supplementary Ecological Information Report. December 2024. Tyler Grange
- Appendix 3; Biodiversity Net Gain Assessment. October 2024. Tyler Grange

Protected Species/Habitats

The supplementary Ecological Report is welcomed. Further assessment of the habitats on site has confirmed the main development area habitat type as tall ruderal. It is noted that the habitat present does not meet the stipulated criteria for open mosaic habitat which is accepted.

The location of the confirmed bat roost is also welcomed and it is noted that although in close proximity, the roost is outside of the development boundary and will not be directly impacted by the proposals. However, this roost site is important as supports Annex II bat species, features of the Bath and Bradford on Avon Bat SAC.

The boundary habitats consist largely of semi-natural broadleaved woodland, neutral grassland and scrub and appear to be important features for bats commuting across the landscape. The presence of Annex II bat species within the bat surveys undertaken together with the close proximity of the roost in the air shaft evidence that this area is important for Annex II bats which are a feature of the SAC. The transect and static monitoring surveys did not include the central site or southern section of the site and no additional surveys have been undertaken in response to the Council and Natural England's previous comments, therefore bat use in these areas is not fully understood. In the absence of additional surveys, it should therefore be inferred that bats use these areas for both foraging and commuting and any loss of habitat must be included within the impact assessment and HRA due to the bats being associated with the SAC.

A range of other notable and protected species including breeding birds and reptiles were also identified on site. A reptile translocation strategy will be required and should form part of the CEMP which could be secured by condition. No evidence of dormice were found although suitable habitat is present to support this species.

The neutral grassland and scrub habitat to the south of the site will also largely be retained and enhanced which is welcomed in principle and discussed in more detail below.

No evidence of additional protected species were identified on site, however, we welcome the proposals to create new habitats and provide biodiversity enhancements such as bird boxes and hedgehog hibernacula. These proposals should be included on an Ecological Mitigation Plan which could be secured by condition.

Bath and Bradford on Avon Bat Special Area of Conservation (SAC) Greater and Lesser Horseshoe bat and Bechstein bat Buffer Zone

The application site sits within the buffer zone of the Bath and Bradford on Avon Bat SAC for Greater horseshoe bats Bechstein bats and Lesser Horseshoe bats and is within a direct mitigation route for Drews Pond Wood as outlined within Corsham Batscape Strategy.

Greater and Lesser Horseshoe bats were recorded along the northern, eastern and western boundaries of the site as well as being recorded roosting within the slope shaft to the south west of the site. It should therefore be assumed that the Annex II bats recorded on site are part of the SAC and are currently utilising the site. Although it is understood that the adjacent roost will not be directly impacted, roosting SAC bats could be impacted through loss of foraging and commuting routes.

In addition, Bechstein bats cannot be ruled out on site and may have been recorded and grouped within the myotis records. Bechstein bats should therefore also be a consideration within the impact assessment and HRA.

The application has potential to result in significant adverse impact on the special features of that site. Appropriate Assessment (AA) under Section 63 of the Habitats Regulations must be carried out by the relevant Competent Authority (the LPA) to determine the potential significant effects and the suitability of any measures proposed to avoid or mitigate those effects. Additional information is required to enable the AA to be undertaken, which must be completed and the conclusion agreed with Natural England prior to the application being determined.

Corsham Batscape Strategy states that development can only proceed in these areas where adequate mitigation can be put in place to ensure the retention of the functionality of the habitat. Currently, insufficient information has been submitted to enable us to assess fully the adequacy of the mitigation proposed.

Habitat loss

The proposals will lead to a loss of at least 2.517ha of foraging habitat. Habitat enhancement proposals of the southern section of the site are welcomed to compensate for this loss however consideration must be given to the timescales for new planting to become effective to compensate for this loss.

Moreover, planting to buffer impacts of lighting should be in place at the earliest possible stage to ensure functional habitat exists and the proposed mitigation measures are effective prior to occupation.

It is noted that a large area of trees and scrub along the northern boundary will be removed, some of which is outside of the red line boundary. Although it appears some habitat will be retained, this will be further impacted by the creation of footpaths. An assessment of the impacts on habitat connectivity throughout construction and consideration of the proposed planting timetable must be included as discussed above. This should be included within a Landscape Ecological Management Plan (LEMP) to ensure functional habitat is retained along this boundary throughout construction and operation. This will be required prior to determination to form the mitigation to support an HRA.

Loss of foraging resource and the scale of the building will prevent adaptive foraging /commuting routes directing flight paths into edge habitat which will be subject to additional pressures, this is discussed below but must be a consideration within the impact assessment and mitigation strategy to support the AA and suitable mitigation proposed.

A number of attenuation ponds are to be created to enhance habitats, for these to be a positive resource for bats year round, they will need to demonstrate that they can hold water permanently.

Lighting impacts

An updated External Lighting Report was submitted in support of the application which is welcomed. We note proposals to reduce lighting impacts will include dimming, use of sensors and hoods/shields. The external lighting layout plan (9123-JCA-ST-XX-D-E-63001, September 20204) provides an indication of the proposed lighting at full capacity worst case scenario and the intention will be to run the site at a lower capacity which is welcomed. However, it would appear that the dimming function and lighting proposals can still be manually altered/overridden with potential lighting impacts remaining at worst case scenario, which is a concern.

Construction lighting impacts are also of concern and must be addressed prior to determination to support the AA and ensure construction lighting impacts are minimised.

It is noted that the bat corridor along Westwells Road to the north east of the site contains habitat that will be lit above the expected 0.5 lux maximum. Whereas previously bats could have altered their flight lines to avoid street lighting in this area, the proposals will produce a pinch point potentially severing connections to habitat further north. Combined with habitat removal along the northern boundary, this may lead to habitat severance, which is cause for concern.

Corsham Batscape Strategy states that 'it may be necessary to buffer bat habitat features considerably from development in order to secure suitable light levels. A minimum stand off distance of 15m has been suggested'. Distances from the building to the street lighting at Westwells Road should be included on the lighting lux levels to demonstrate that a suitable buffer (that will remain unlit) will be retained at this pinch point. Where this cannot be demonstrated, landscaping and lighting designs will need to be amended to ensure this boundary can remain a functional foraging/commuting route.

As discussed above, habitat proposed to buffer lighting impacts must be in place and functional prior to occupation and this should be outlined within a LEMP to be submitted prior to determination to ensure lighting impacts are minimised as proposed within the lighting strategy. In addition, we would require the inclusion of monitoring of light levels to ensure the proposed levels are not exceeded once in operation.

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 (June 2024. Tyler Grange) confirming the pre- and predicted post- intervention biodiversity value of the site has been submitted. 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	35.83 Habitat units
	2.09 Hedgerow units
	0 Watercourse units
Are there any irreplaceable habitats on-site?	No
Has any habitat degradation of occurred?	No

The development will result in a loss of area habitats on site. The current proposal is to purchase 8.15 habitat units through an offsite provider to meet the required 10% gain.

Any permission granted will require the submission of a Biodiversity Gain Plan demonstrating how the biodiversity objective (10% biodiversity net gain) will be met. The development can only legally commence once the Biodiversity Gain Plan condition has been discharged.

In order for the council to fulfil its BNG monitoring responsibilities. A BNG monitoring contribution will be required and secured via a separate legal agreement.

Moreover, due to the complexity of the habitats to be created on site, a Habitat Management and Monitoring Plan will also be required and can be secured by condition. It is noted that other biodiversity enhancements outside of BNG will be provided on site. Details of this biodiversity mitigation should be included within the LEMP to ensure retention of these features in perpetuity with BNH habitats included within the HMMP.

In Summary

Due to the proximity of the Bath and Bradford on Avon Bat SAC and adjacent roosting site for Annex II bat Species (a features of the SAC) coupled with the Drews Pond Wood direct mitigation route as outlined within the Corsham Batscape Strategy, which runs through the site, a Habitat Regulations Assessment will be required in support of this proposal.

Currently, insufficient information has been submitted to support this application, additional information is required to address impacts of habitat loss and lighting impacts upon the features of the Bat SAC as detailed above.

Final sign off – all matters addressed:

Ecologist	Date
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Jenna Buss	
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