

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jenna Buss
Date:	17/11/2025
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 commuting bats will be maintained. A plan with dark corridors along key bat habitat/ corridors clearly identified.	Yes 18/11/2025 Construction Environment Management Plan. October 2025. Tyler Grange Landscape Ecological Management Plan. October 2025. Tyler Grange External Lighting Report. October 2025. 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
- Construction Environment Management Plan. October 2025. Tyler Grange
- Landscape Ecological Management Plan. October 2025. Tyler Grange
- External Lighting report. October 2025. JCA
- Ecological Enhancement Plan. October 2025. 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 has been included within the CEMP to include trapping out together with other 'reasonable avoidance measures' which is welcomed. Reptiles will be translocated to the southern habitat area to be retained. However, it is unclear whether this will be undertaken before or after habitat enhancement works within the southern area. This will need to be confirmed within the CEMP.](#)

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.

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 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.

The submission of the LEMP report is welcomed however, we note that it is stipulated to be in place for 30 years. As the requirement for the LEMP relates to Core Policy 50 and habitat management in relation to the Bath and Bradford on Avon Bat SAC, the LEMP is required in perpetuity and will require amendment to address this.

It is noted that infill hedgerow and pond creation works are to be undertaken prior to commencement of development which is welcomed. It is currently unclear however, the extent of infill planting and the location of these pre commencement works. Additional information will be required prior to commencement to ensure the proposed habitats created will compensate for the loss of habitat on site and within the boundary features, particularly in the northern and eastern sections of the site. This can be secured in an amended LEMP prior to commencement of works.

Where monitoring measures are proposed, we recommend submitting additional details to include the upfront landscaping works that will ensure habitat retention throughout construction. Certain management actions may need to be implemented earlier in the programme than other habitat creation measures, and this should be clearly reflected within the Landscape and Ecological Management Plan (LEMP). Clarification on the timings of enhancement works in the southern section will also be required, particularly in relation to the reptile translocation works.

The principles outlined in the Landscape and Ecological Management Plan (LEMP) have been applied to support the Habitat Regulations Assessment (HRA) and Appropriate Assessment (AA). However, additional details will be required before works commence, and these should be secured through appropriate planning conditions.

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. This in addition to the habitat removal along the northern boundary is a potential habitat severance 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.

The updated lighting strategy (External Lighting Report, October 2025, JCA) is welcomed. The amendments confirm that the car park will remain unlit, significantly reducing light spill into the pinch point in the north-eastern area of the site. The worst-case external lighting scenario now demonstrates that the bat corridor buffer zone along Westwells Road will remain unlit or minimally lit, which is a positive outcome and should be secured by condition.

Monitoring of lighting impacts is included within the LEMP which is welcomed. Annual monitoring results should be submitted to the Local Planning Authority for review.

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 to support CP50 and no net loss of biodiversity in addition to the HMMP which should include BNG requirements only.

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.

An AA has been undertaken using the information submitted and has been submitted to Natural England (NE) for review. This application must not be determined until NE have provided their comments.

CONDITIONS:

1. Prior to the commencement of works, including demolition, ground works/excavation, site clearance, vegetation clearance and boundary treatment works, 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:

- a. Identification of ecological protection areas/buffer zones and tree root protection areas and details of physical means of protection, e.g. exclusion fencing.
- b. Working method statements for protected/priority species, such as nesting birds and reptiles.
- c. Mitigation strategies already agreed with the local planning authority prior to determination, such as for great crested newts, dormice or bats; this should comprise the pre-construction/construction related elements of strategies only.
- d. 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.
- e. Key personnel, responsibilities and contact details (including Site Manager and ecologist/ECoW).
- f. Timeframe for provision of compliance report to the local planning authority; to be completed by the ecologist/ECoW and to include photographic evidence.

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. The development will be carried out in strict accordance with the following documents:
 - 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
 - External Lighting report. October 2025. JCA
 - Ecological Enhancement Plan. October 2025. Tyler Grange

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

3. Prior to the start of construction, a Landscape and Ecology Management Plan (LEMP) shall be submitted to and approved in writing by the Local Planning Authority. The LEMP will include long term objectives and targets, management responsibilities and maintenance schedules for each ecological feature within the development, together with a mechanism for monitoring success of the management prescriptions, incorporating review and necessary adaptive management in order to attain targets.

The LEMP shall be implemented in full and for the lifetime of the development in accordance with the approved details.

REASON: To ensure the long-term management of landscape and ecological features retained and created by the development, for the benefit of visual amenity and biodiversity for the lifetime of the scheme.

4. 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.

No construction shall commence until the habitat creation and enhancement works set out in the approved HMMP have been implemented.

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.

Final sign off – all matters addressed:

Ecologist Jenna Buss	Date 18/11/2025
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