Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	~~Rachel Whyte~~ Patrick Olshansky
Date:	~~10/04/2024~~ 19/11/2025
Application number:	PL/2023/10772
Proposal:	Standing of an additional two residential caravans (two statics) and the storage of two touring caravans on the land, refurbishment of site through ancillary works.
Site address:	Land at 2 The Holdings, Ashton Common, Steeple Ashton, Wilts
Case officer:	~~Jonathan Maidman~~ Joe Richardson

Recommendations:

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

Further Information Required:

	Issue	Policy/Legislative Compliance	Date Information Requested & Further Information Required	Satisfactorily Addressed (Document & Date)
~~1.~~	Bath and Bradford on Avon Bat SAC	~~TWBMS, WCA 1981, Hab. Regs.~~	~~**10/04/2024** – Sensitive Lighting Strategy~~	~~**NO**~~ **19/11/2025** To be secured by appropriate condition.
~~2.~~	~~-~~Bath and Bradford on Avon Bat SAC	~~TWBMS, WCA 1981, Hab. Regs.~~	~~**10/04/2024** – Confirmation of number of units.~~	~~**NO**~~ **YES 19/11/2025** Statement from applicant/agent 29/09/2025 (also see email from agent uploaded 05/03/2024).

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 as listed below 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:

- Proposed Block Diagram (UK Map Centre.com, uploaded 29 Sept 2025)
- Existing Block Plan (UK Map Centre.com, 16 Oct 2025)
- Design and Access Statement (11 Dec 2023)
- Indicative Caravan Plan and Elevations (Stuart Curruthers, uploaded 30 Jan)
- SV Photos taken 19/02/2024
- Natural England Comment (uploaded 02/08/2024)

Biodiversity No Net Loss

~~A Small Sites Biodiversity Metric has been completed using the information available. This indicates a deficit of 0.2709 habitat units. Core Policy 50 of the Wiltshire Core Strategy requires all development to demonstrate no net loss of biodiversity. The Trowbridge Bat Mitigation Strategy requires development to demonstrate no net loss using an established metric. Given the retrospective nature of this application a contribution into an approved mitigation scheme to the value of the deficit would be required to demonstrate no net loss. The Council have their own biodiversity mitigation scheme with a unit price of £30,000 for habitats. The total contribution required would therefore be £14,613 (i.e., £8,127 (£30,000 * 0.2709) for habitats.~~ **~~Payment must be secured via a legal agreement.~~**

~~A commitment to tree planting on the site and sensitive management of the retained hedgerows for the benefit of biodiversity would be welcomed. This could be shown on an updated block plan.~~

The application has not been supported by an ecology report. A review of publicly available mapping data shows the site to comprise habitats typical of residential gardens. The site is bounded by overgrown mature hedgerows and trees. Photographs from the site visit (carried out on 19/02/2024) shows that boundary hedgerows and trees have been cut back and the site now comprises gravel only with no vegetation. Whilst boundary hedgerows have been retained, these are now cut into a box shape. The conditions onsite are consistent with the submitted proposed block diagram (received ~~06/03/2024~~ 29 Sept 2025) and the application appears to be wholly retrospective.

The retention of existing hedges and new hedge planting as shown on the updated Block Plan (uploaded 29 Sept 2025) is welcomed. To ensure ecological functionality to foraging and commuting bats is maintained in accordance with CP50, these hedges must be enhanced and managed for the benefit of biodiversity. A Hedgerow Mitigation and Enhancement Plan detailing measures that seek to enhance and maintain the hedges for the benefit of biodiversity is required. This must include, but not be limited to:

- Planting of all gaps with a diverse mix of native hedge and tree planting.
- A commitment providing a no development buffer along the hedges, extending at least beyond the root protection zones of hedge shrubs and trees. Works that could detrimentally effect the health of the shrubs and trees within the hedge must not be permitted in the buffer.
- Management measures aimed at achieving a bushy, unfragmented hedge that benefits biodiversity and function as commuting and foraging habitat to bats. Following establishment, the hedgerow should be managed for biodiversity in accordance with best practice guidance i.e. cutting the hedgerow in a rotation over several years to encourage good structure and leave foraging opportunities for wildlife.

Hedgerow Mitigation and Enhancement Plan must be secured by condition (please refer to suggested wording below).

Habitat Regulations Assessment (HRA)

Bath & Bradford on Avon Bats Special Area of Conservation (SAC)

The application site is located within a consultation zone for Bechstein bats associated with the Bath & Bradford on Avon Bats SAC and therefore has potential to result in significant adverse impact on the special features of that site.

Trowbridge and Westbury Bat Mitigation Strategy

The application site is located within the red high-risk zone of the Trowbridge and Westbury Bat Mitigation Strategy (TWBMS) SPD (adopted ~~Feb.2020~~ July 2025). The Red Zone is located within 600m of woodlands or trees known to support maternity roosts for Bechstein's bat. New development of greenfield or residential brownfield sites within this zone is likely to result in high and unacceptable risks to bat populations, as a result of increased recreational pressure on key woodland sites and/or because of habitat loss. As such, development of new sites within this zone is highly unlikely to be permitted, and there should be no net increase in new residential curtilage or light levels within the zone.

Mitigation Strategy

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. The mitigation strategy proposed for the AA is as follows:

- Sensitive lighting strategy. If external lighting is required, then the luminaire specifications and lighting locations must be provided. Please note lighting must be restricted to the site boundary as we are unable to accept increases in artificial lighting close to the hedgerow. Lighting must be designed in accordance with the appropriate Environmental Zone standards set out by the Institution of Lighting Professionals (ILP) Guidance Notes on the Avoidance of Obtrusive Light (GN 01/2021) and Guidance note GN08/23 "Bats and artificial lighting at night", issued by the Bat Conservation Trust and Institution of Lighting Professionals. The lighting strategy must be secured by condition (please refer to suggested wording below).

- **A contribution towards the delivery of mitigation to address strategic recreational pressure associated with the TWBMS, at a rate of ~~£641.48~~ £925 per dwelling (Total £1850)**. The contribution must be secured by a legal agreement. In the absence of a S106 the fee can be paid by a section 111 agreement. Where the applicant elects to use the S111 process the fee must be paid and S111 signed by both the applicant and the council on the granting of planning permission.

- ~~A contribution towards habitat mitigation as per the TBMS, at a rate of £777.62 per dwelling.~~ As this is not a greenfield site this contribution is not applicable.

- Hedgerow Mitigation and Enhancement Plan (please refer to text above and suggested condition). Following establishment, the hedgerow should be managed for biodiversity in accordance with best practice guidance i.e. cutting the hedgerow in a rotation over several years to encourage good structure and leave foraging opportunities for wildlife.

Further Information Required

~~Insufficient information has so far been submitted to enable the AA to be undertaken, which must be completed and the conclusion agreed with Natural England prior to the application being determined.~~

1. ~~Sensitive Lighting Strategy~~

   ~~The Sensitive Lighting Strategy must demonstrate that light spill on the boundaries will be <0.2 lux on the horizontal plane and <0.4 lux on the vertical plane. Where baseline levels are above the lux levels stated here, the development design should ensure there is no increase above existing background light levels. Section 8.3 of the TBMS should be consulted when designing the strategy.~~ To be secured by appropriate condition.

2. ~~Confirmation on the number of units proposed.~~

   ~~It is understood that there have been some discussions over the number of units proposed during the application process. The number of units proposed must be confirmed for the AA. The final number of units would need to be secured appropriately secured should planning permission be granted.~~ Clarification on this matter has been provided. See Statement from applicant/agent 29/09/2025 (also see email from agent uploaded 05/03/2024).

The holding objection has been withdrawn, provided the above mitigation is secured via planning condition or legal agreement (S106/ S111). See conditions below.

CONDITIONS:

Compliance with Submitted Documents

The development will be carried out in strict accordance with the following documents:

- Block Plan (uploaded 29 Sept 2025)
- Indicative Caravan Plan and Elevations (uploaded 30 Jan 2024)

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

Hedgerow Mitigation and Enhancement Plan

Prior to the commencement of any works, including vegetation removal and demolition, details of a Hedgerow Mitigation and Enhancement Plan including, but not exclusively, native planting and management to benefit biodiversity, shall be submitted to the local authority for approval. The approved details shall be implemented before occupation of the final works.

REASON: To make the development lawful under the Habitats Regulations ando provide mitigation/enhancement for biodiversity.

TWBMS Lighting

No external lighting shall be installed on site until plans showing the type of light appliance, the height and position of fitting, illumination levels and light spillage have been submitted to and approved in writing by the Local Planning Authority. The plans will be in accordance with the appropriate Environmental Zone standards set out by the Institution of Lighting Professionals (ILP) Guidance Notes on the Avoidance of Obtrusive Light (GN 01/2021) and Guidance note GN08/23 “Bats and artificial lighting at night”, issued by the Bat Conservation Trust and Institution of Lighting Professionals.

The approved lighting shall be installed and maintained in accordance with the approved details and no additional external lighting shall be installed.

This condition will be discharged when a post-development lighting survey conducted in accordance with section 8.3.4 of the Trowbridge & Westbury Bat Mitigation Strategy has been submitted to the Local Planning Authority demonstrating compliance with the approved lighting plans, having implemented and retested any necessary remedial measures.

REASON:
In the interests of the amenities of the area, to minimize unnecessary light spillage above and outside the development site and to ensure lighting meets the requirements of the Trowbridge & Westbury Bat Mitigation Strategy.

Final sign off – all matters addressed:

Ecologist: Patrick Olshansky	Date: 02/12/2025