

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	15/12/2025
Application number:	PL/2025/08779
Proposal:	Erection of extensions to existing poultry housing and associated infrastructure
Site address:	Oakstone Farm, Bratton Road, West Ashton, Trowbridge, BA14 6AX
Case officer:	Steven Sims

Recommendations:

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

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date)
	Bats and protected sites	Habitat Regulations, CP50, NPPF	15/12/2025 -Demonstration of retention and enhancement of boundary hedgerows through an Ecological Mitigation Plan -Confirmation of financial contribution -Confirmation of no new external lighting	
	GCN	Habitat Regulations, CP50, NPPF	15/12/2025 -Signed and countersigned Impact Assessment Conservation Payment Certificate (IACPC) for District Level Licencing	
	BNG	Environment Act 2021	15/12/2025 -Updated metric -Condition assessment sheets -Clarification of post-development gains without overlap with PL/2025/05985	

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

Information considered:

- Preliminary Ecological Appraisal, Bat Roost Assessment and BNG Feasibility Report v2, Acorus, October 2025
- Ecological Technical Note, Halpin Robbins, October 2025
- Summary Report (ecology), Halpin Robbins, July 2025
- Statutory Biodiversity Metric, Tracy Amies, October 2025

The site comprises existing poultry housing, surrounded by modified grassland, scrub and hardstanding. There is a pond towards the southwest corner of the redline boundary, and agricultural fields border the site in all directions. It is proposed to extend two poultry buildings into vegetated areas at the south as well as a small area of hardstanding in the northeast. Plans to erect three ancillary buildings on site were recently approved (PL/2025/05985) with no objections from Ecology, subject to a GCN method statement included within a CEMP and a lighting condition.

COMMENTS:

Salisbury Plain Special Protection Area (SPA) 6.4km buffer

This application lies within the 6.4km zone of influence of the Salisbury Plain SPA and potential impact of recreational pressure on stone curlew, in combination with other plans and projects, must be considered.

A test of likely significance has been carried out by the relevant Competent Authority (Wiltshire Council) as required by Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended). This concluded that given the scale and nature of the development (there will be no additional overnight accommodation created and there are no known stone curlew records within 1km), there is no mechanism for adverse effect. The HRA has concluded that the application is not likely to have significant impacts on Salisbury Plain SPA and subsequently the application is screened out of Appropriate Assessment.

Bath and Bradford on Avon Bat Special Area of Conservation (SAC)

The application site is located within the **grey** and **yellow** zones of the Trowbridge & Westbury Bat Mitigation Strategy (TWBMS) and therefore has potential to result in significant adverse impact on the special features of the Bath & Bradford on Avon Bats Special Area of Conservation (SAC). The application must therefore be considered under the Habitats Regulations.

The grey medium risk zone represents an area where new residential development is likely to result in increased recreational use of important woodland bat sites. This application does not concern residential development, therefore, a financial contribution towards the council's strategic recreational pressure mitigation scheme is not required.

The yellow medium risk zone represents areas where habitat has been shown to be of importance, and in particular takes into consideration the foraging areas and flightlines of horseshoe and Bechstein's bats and is anticipated to be able to accept a degree of development pressure provided applications are designed in accordance with the principles in the TWBMS. Impacts will arise on individual sites and in-combination with other sites as a result of loss and/degradation of habitat of importance to the qualifying bats.

It is noted that the Ecological Technical Note reads "*The TWBMS also states that Greenfield sites may also be subject to a financial contribution to the LPA; this is not deemed to be relevant to this site*". However, it is not clear how this conclusion has been reached. Whilst a financial contribution was not considered applicable to the previous plans (PL/2025/05985), said plans primarily impacted areas of existing hardstanding and concerned the erection of three small

buildings, set back from the site's peripheries. Presently, the main areas to be affected are considered to comprise greenfield land (previously undeveloped land, in this case, grassland and scrub). Additionally, habitat surrounding the site (which contains hedgerow and scrub) could be permanently impacted by, e.g., lighting.

This application must therefore be assessed against TWBMS criteria. Future proposals for this site will also need to be in accordance with TWBMS criteria. considering impacts either alone or in combination with other plans and projects.

APPROPRIATE ASSESSMENT FOR APPLICATIONS FALLING WITHIN THE YELLOW ZONE AND GREY ZONE OF The Trowbridge and Westbury Bat Mitigation Strategy

Issues are highlighted in red

Item	TWBMS criteria	Details provided for Application
1	Did the application seek pre-application advice to establish the extent to which the TWBMS will drive layout and design of the development. Note this is not crucial to a favorable AA.	Pre application advice has not been sought.
	<u>Greenfield sites in Yellow Zone</u>	
2	Surveys should be completed: • In accordance with Council pre-application advice if provided • In accordance with BCT Good Practice Guidelines and the specifications described in Section 6 of the TWBMS • Could mating sites have been overlooked (survey April and October for male roosts)	The PEA states that the site contains mixed scrub, modified grassland (mown), native hedgerow, scattered trees and developed land. The existing buildings have negligible suitability for hosting roosting bats. Some scrub and two areas of grassland will be lost to accommodate the poultry building extensions. The PEA concludes that the trees, hedgerow and scrub offer some suitable commuting and foraging habitats for bats, as well as small woodland patches to the southwest and east. The surrounding land is dominated by arable fields, but there also appears to be pasture and connected hedgerow which will be of some value to species such as Greater Horseshoe bats (known to be associated with patchworks of fields, particularly containing grazed pasture). Bat activity surveys have not been undertaken, but given the scale of the works, further surveys would not be likely to add any decisive information to this assessment, and this AA is conducted with the assumption that qualifying bat species could be using the site for foraging and commuting.
3	Masterplan to be provided which	This is a minor application and a

	covers entire allocation or large application and shows: • Core Bat Habitat features. • Layouts demonstrating that housing numbers are compatible with constraints. • That sufficient land can be set aside to achieve no net loss of habitat (Table 7.1). • Wide swathes of unlit bat habitat with associated buffer zones are provided ensuring landscape permeable to commuting bats is maintained.	masterplan is not required.
4	<u>Outline applications on green field sites in Yellow Zone</u>, Ecological Parameters Plan (para 161) to include: • Specific site design measures/restrictions to deliver the development. • Demonstrate compliance with TWBMS standards for habitat mitigation (Section 8.2). Including the location and extent of required Zones A and B. • No loss of core bat habitat (roosting or foraging). • Wide swathes of unlit bat habitat with associated buffer zones ensuring landscape permeable to commuting bats.	This is a full planning application and an EPP is not required.
5	<u>Greenfield Sites in the Yellow Zone</u>. Statutory Biodiversity Metric demonstrating no net loss. The calculation is supported by pre and post development maps. The post development maps align with other plans and drawings.	A Statutory Biodiversity Metric has been provided. However, there are issues to be addressed before it can be accepted (see later section). Therefore, at present, insufficient information has been provided to address this criterion.
6	<u>For reserved matters and full applications on green field sites in Yellow Zone</u>, an Ecological Mitigation Plan to be submitted containing (para 162): (i) Scaled drawing to show	No mitigation plan has been provided. A drawing demonstrating that the functionality of the hedgerows will be maintained (and enhanced) should be submitted. Figure 7 of the ecology report ("proposed habitats") could be used to address this, but must be

	• Details of replacement roosts. • Core bat habitat (foraging and commuting) to be retained, created and enhanced. • Location/extent and full landscape specifications for tree and shrub planting, wildflower grassland etc. (iv) proposals are in accordance with the standards for habitat mitigation and management as described at section 8.2 and Figure 6 in the TWBMS. (v) Wide swathes of unlit bat habitat with associated buffer zones ensuring landscape permeable to commuting bats. (vi) Retained core bat habitat connects to the wider habitat network.	amended to show the currently proposed block plan to demonstrate that hedgerow and other boundary habitats will not be encroached. Please note, whilst habitat improvements can be achieved through on-site BNG, details of post-development habitats and landscaping are unclear (see BNG comments below). It is also not known whether potentially important habitats (such as the bordering hedgerow, scrub, woodland, etc.) will be impacted by lighting and, therefore, whether any mitigation for lighting is required. Please could the applicant confirm whether any new external lighting will be installed?
7	<u>Applications on green field sites in Yellow Zone.</u> Lighting Impact Assessment, including lux contour plots, in line with Section 8.3 of TWBMS.	It is not known whether any new external lighting will be installed (see above). Therefore, at present, insufficient information has been provided to address this criterion.
8	<u>Reserved Matters and Full applications on green field sites in Yellow Zone</u> CEMP to set out: • Location of temporary work areas. • Schedule of works covering removal, enhancement and creation of habitat features in relation to construction works. • Details of compliance arrangements and how staff will interface with Council TWBMS Project Officer. • Management of habitats during the construction phase.	A CEMP must be required by condition. The CEMP must include drawings and details that demonstrate how the retained (and enhanced) boundary habitats, including hedgerow, will be protected during the construction works. It is noted that a CEMP was supplied for previous application PL/2025/05985 prior to determination. Similarly, the applicant may wish to submit a CEMP for review now, prior to determination.
9	Application to demonstrate measures to ensure core bat habitat will remain relatively undisturbed by the effects of urbanisation.	The proposed development is for agricultural purposes.
10	<u>Reserved Matters and Full application on green field sites in Yellow Zone,</u> LEMP to set out:	This is a minor application and a LEMP would not be proportionate to the proposals. The CEMP will ensure habitats are adequately protected during

	- Plan showing extent of habitats which the Management Company will be responsible for - Management objectives for each habitat 1 and 5 year schedules of management activities including replacement /restoration works where damage occurs. - Review mechanism	construction. Post-construction, improvements should be secured via a compliance condition, as well as through the required BNG.
12	An appropriate lighting monitoring regime has been provided.	It is not known whether any new external lighting will be installed (see above).
13	The applicant agrees that a financial Strategic Habitat Mitigation Contribution (yellow medium risk bat sensitivity zone) of £972.03/ dwelling or £29,137.50 per hectare will be secured by S106.	It is recognised that some of the site is already developed and would not be considered "greenfield". As such, the financial contribution should be based on the area of greenfield land within the site boundary only, excluding any developed areas. Based on the total area of undeveloped habitats reported in the BNG metric, the area of greenfield land would equate to 1.76 ha. The required contribution will therefore be $1.76 \times £29,137.50 = £51,146.69$.
<u>Grey hatched recreational pressure zone</u>		
14	New residential development proposals in the grey hatched medium recreational risk zone will be expected to contribute towards the council's strategic recreational pressure mitigation scheme or Deliver sufficient natural recreational focused space/ Suitable Alternative Natural Greenspace (SANG) [depending on the number of residential dwellings proposed]. Major developments (≥50 dwellings) must now <u>deliver Suitable Alternative Natural Greenspace (SANG) on site</u>	This application is not for residential development and will not result in any increase in recreational pressure, therefore, the grey zone mitigation is not applicable to the current proposal.

S106 requirements:

- **Strategic Habitat Mitigation Contribution (yellow medium risk bat sensitivity zone).** This is currently set at £972.03 per dwelling, or £29,137.50 per hectare. Based on the total area of

undeveloped habitats reported in the BNG metric, the area of greenfield land would equate to 1.76 ha. The required contribution will therefore be $1.76 \times £29,137.50 = £51,146.69$.

Great Crested Newts (GCN)

The pond on-site was identified as a GCN breeding pond (based on eDNA results). The habitat to be lost comprises small sections of modified grassland and scrub (at least 0.2 ha in total) adjacent to the existing poultry buildings. These habitats are, however, also adjacent to the GCN pond. The proposed extension to the north of the pond would fall within ~30m of the pond, and the extension to the east of the pond would fall within ~20m.

No supporting documentation has been submitted to demonstrate how the proposals will avoid/mitigate against the impacts of (i) destruction of terrestrial GCN habitat, (ii) potential damage to a GCN pond (through, e.g., construction-related pollution) and (iii) disturbance, killing or injuring of individual GCN. Using Natural England's Rapid Risk Assessment tool (NB., the applicant does not appear to have applied this), an offence is highly likely.

GCN are a European Protected Species afforded stringent protection under the Conservation of Habitats and Species Regulations 2017 (as amended) and as such are a material consideration within the planning consultation process. Sufficient and appropriate mitigation measures to ensure that GCN are not adversely affected as a result of the proposed development must be submitted as part of the proposal.

The applicant may wish to consider District Level Licensing (DLL). Instead of carrying out site-specific mitigation and compensation, the applicant can apply to Natural England to determine whether the scheme is eligible for DLL. Once the scheme is accepted under the District Level Licensing Scheme for Great Crested Newts, the Impact Assessment and Conservation Payment Certificate (IACPC), which must be signed by the applicant and countersigned by Natural England is submitted to the LPA. Please note: 'Annex 3: Site Location' must also be submitted with the IACPC and correspond with the red line site boundary submitted with the planning application.

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 (Statutory Biodiversity Metric, Tracy Amies, October 2025) stating the baseline and predicted post- development biodiversity units of the site has been submitted (with 'Preliminary Ecological Appraisal, Bat Roost Assessment and BNG Feasibility Report v2, Acorus, October 2025' including the baseline map).

The pre-development (baseline) situation is summarised below.

On-site pre-development (baseline) biodiversity value	13.33 Habitat units
	6.63 Hedgerow units
	0.00 Watercourse units
Are there any irreplaceable habitats on-site?	No
Has any habitat degradation of occurred?	No

The following issues must be addressed in the baseline prior to determination:

- The area of habitat to be lost, as per the metric calculation, is shown as 0.04 ha. However, using GIS as well as measurement of the Proposed Block Plan, the footprint of the proposed extensions will cover *at least* 0.2 ha of grassland (plus ~0.03 ha of hardstanding for the northeast extension). Please could the applicant confirm (using marked and scaled maps, if necessary) the areas of habitat to be lost, and update the metric as appropriate?
- The loss of hardstanding (for the extension to the northeast) is not captured in the metric, albeit this is a minor observation.
- The condition assessment sheets for the baseline habitats have not been submitted. This information is a minimum requirement set out in Article 7 of The Town and Country Planning (Development Management Procedure) (England) Order 2015 and must therefore be submitted for review by the ecology team prior to determination.
- Final confirmation of how the development will achieve BNG is a post-determination matter, however, consideration should be given to how any proposed BNG will be secured. It is not clear where the proposed units will be delivered for this application relative to the units proposed under extant permission PL/2025/05985 (**NB. The submitted PEA appears to be the same submitted for PL/2025/05985, referring to the same post-development habitat enhancements**). A map should be provided to clarify that there is no overlap between the proposed habitat and hedgerow gains, and that BNG can be delivered on-site separately for both proposals.

IN SUMMARY: Insufficient information has been submitted. In carrying out its statutory function, the LPA must be reasonably sure that the proposal will not result in significant adverse effects on protected habitats or species. The information outlined above must therefore be submitted and reviewed by the LPA's ecology team prior to determination of the application. I therefore maintain a holding objection until all the issues listed above have been suitably addressed.

CONDITIONS: wording to be provided once all issues have been resolved.

Sign off by WC Ecologist will only be given once ALL outstanding information has been submitted and agreed sufficient.

Ecologist	Date
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