

Wiltshire Council Planning Consultation Response

Officer name: Mary Holmes

Date: 14/04/2025; **16/12/2025**

Application No: PL/2024/09844

Proposal: Erection of a self-build split level dwelling with detached garage (**Outline**)

Site Address: Land Adjacent to Telephone Exchange, Middle Stoke Lane, Limpley Stoke, Wiltshire (closest postcode BA2 7GF)

Case Officer: Verity Giles-Franklin

Recommendations:

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

	Issue	Policy / Legislative compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date)
1	Bats	Habs Regs	14/04/2025. Application is within a core zone for bats associated with the Bath and Bradford-on-Avon Bats SAC. Wiltshire Bat SAC Planning Guidance (2015) provides advice on surveys required to support any application in this area.	15/12/2025 Static surveys show the application site is regularly used by Annex II species.
2	Bats & Lighting	Habs Regs	14/04/2025. A Lighting Impact Assessment is required to assess the impacts on the likely foraging commuting habitat (scrub and grassland).	NO

3	Bats	Habs Regs	14/04/2025. Ecological Parameters Plan required. This will be informed by ecological constraints once all bat surveys and lighting assessment has been completed. <i>Further details below and in Wiltshire's Planning Bat SAC Guidance (2015).</i>	NO
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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.

Matters Considered:

Thank you for consulting me on the above application in relation to ecology. I have reviewed the submitted information against various mapping (OS and aerial) of the surrounding areas together with a review of any relevant designated sites and existing records of protected/notable species.

The application is supported:

Phase 1 Preliminary Ecological Appraisal Survey (Brown Fisher Environmental Reports 4 Planning, 2nd September 2024).

Proposed Block Plan. Rev 03. (Planning by Design, 19.02.2025).

Planning Design and Access Statement (Planning by Design, 19.02.2025).

Pre-development Tree Survey Report (Brown Fisher Environmental Reports 4 Planning, 2nd September 2024).

The site is located in the village of Limpley Stoke 4km south-east of Bath. The site habitats comprise scrub and trees, including some mature trees. The Pre-Development Tree Survey Report details that five trees will be removed. The area is dark and likely to be important for commuting and foraging bats. The River Avon, Kennet and Avon Canal and railway corridor are located to the east.

Bath and Bradford-on-Avon Bats SAC Habitat Regulations Assessment

The site is located within Wiltshire Council's 'consultation zones' for greater and lesser horseshoe bats associated with Bath and Bradford-on-Avon Bat Special Area of Conservation (SAC). No bat surveys have been undertaken and in the absence of bat surveys the LPA will assume the site is important for commuting and foraging bats, including the bats associated with the SAC.

The closest core roost is within 150m (significant lesser horseshoe bat roost and small numbers of greater horseshoe bats) west of the site. In addition, Winsley Mines Site of Special Scientific Interest (SSSI) and a component of the Bath and Bradford-on-Avon Bats SAC is located approx.1.5 km to the east.

Therefore, the application is screened into Appropriate Assessment due to the potential likely significant effects on the Bath and Bradford-on-Avon SAC.

Bat surveys are required in accordance with Wiltshire's Planning Bat SAC Guidance to inform the design/location of the development. As it is assumed SAC bats (light sensitive species) are using the site/some of the site, a lighting impact assessment will be required to inform/feed into the Appropriate Assessment.

Also, as detailed in Wiltshire's Bat SAC Guidance, as the application is outline, an Ecological Parameters Plan is required to inform any detailed application.

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.

Additional Comments 16/12/2025

Documents reviewed:

Static Bat Recording Assessment (Brown Fisher Environmental, 17th October 2025).
Proposed Block Plan. Rev. V7 (Planning by Design, 03.06.2025).
Biodiversity Impact Assessment (Brown Fisher Environmental, 4 October 2024).

The site is approximately 75m east of a core roost for hibernating lesser and greater horseshoe bats at Montana Mine (Stone Hill Quarry) and therefore is likely to be important for these species during the winter months. The site is also likely to be functionally linked to larger horseshoe roosts at Freshford Mill and Winsley Mines SSSI.

The Static Bat Recording Assessment provides survey information between June and September. While this is useful data, this doesn't cover periods when horseshoe bats are likely to forage during winter periods and also times when they travel to and from their hibernation roosts. In the absence of this recording data, we will assume the site is therefore likely to be important all year round for horseshoe bats.

The bat static data confirms the application site provides a significant resource for foraging and commuting greater horseshoe bats and is also important for lesser horseshoe bats. In addition, *Myotis* species were recorded, and this may include Bechstein's bats. In total the application site is used by 8 species of bat.

The report describes the woodland belt along the north-eastern part of the site as important for greater horseshoe bats. The report states: *that maintenance of the extent and quality of all semi-natural habitats in foraging areas and commuting routes and the design of the development around the existing habitats.*

The report also states: *As far as practicable the site should remain part of the wooded corridor, with trees particularly on the edges retained within the design.* The LPA would require that any trees forming part of the wooded corridor proposed for removal be replaced and the area enhanced by any infil tree natural scrub planting where necessary.

The application must be supported by a Lighting Impact Assessment (LIA) (also requested on 14/04/2025). A LIA must include:

Baseline Lighting Surveys & Predicted Post-development Contours undertaken by a suitably experienced and competent lighting professional showing:

- Vertical illuminance contour plans at 1.5m (horseshoe bat flight height) and 4m (Bechstein's bat flight height).
- Post-development contours to include new development internal lighting and be based on Worst-case scenario modelling with any external lighting essential.
- Projected light spill on sensitive bat habitat features
- Target illuminance levels: woodland/commuting and foraging habitat 0.2 lux horizontal, ≤ 0.4 lux vertical.

While this is an outline application, the proposed layout shows the building occupies the centre of the application site. Changing the location and orientation of a building can dramatically alter and reduce the reach of light spill and the encroachment on sensitive bat habitat features so should be carefully considered with the input of a lighting professional.

The building layout will need to ensure the north-eastern wooded corridor is retained and remains dark. This will involve scaling back the proposed building and changing the location so that it sits close to Middle Stoke Lane. There should not be extensive glazing on the north-eastern elevation.

An Ecological Parameters Plan (EPP) has not been submitted (see previous comments above dated 14/04/2025). This will need to demonstrate that the wooded area can be retained and maintained as a dark enhanced functional corridor (included within a minimum of 20m dark buffer). The measurements of the buffers and details requiring the areas to remain dark must be included on the EPP. Any enhancement planting must be suitable for the area and native (see Wiltshire Council Tree Officer comments).

The application has the potential to result in significant adverse effects either alone or in combination with other projects on the Bath & Bradford-on-Avon Bats SAC. As required by the Conservation of Habitats and Species Regulations 2017 (as amended) an Appropriate Assessment (AA) must be completed by the Local Planning Authority (LPA) with a favourable conclusion. Once the AA is completed it must be sent to Natural England, and the application must not be determined until they have agreed with the LPAs conclusion.

Reptiles & Breeding Birds

Habitats on-site have the potential to support widespread reptiles and breeding birds and mitigation measures to minimise impacts on these species must be included with a Construction Method Statement to be secured via planning condition.

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 small sites metric calculation undertaken by Alexander Billingsley on 18th September 2024 confirming the baseline and predicted post- development biodiversity units of the site has been submitted. However, as we are recommending a change in the layout, and this is likely to change the baseline, the metric will need amending to reflect this. I will provide comments when all of the HRA issues have been resolved.

Final sign off – all matters addressed:

Ecologist	Date