

Council Planning Consultation Response

ECOLOGY

Officer name:	Elizabeth Burrows, Senior Ecologist
Date:	09/01/2026
Application No:	PL/2025/09116
Proposal:	Partial demolition of existing garage, re-roofing works, refurbishment and remodelling existing dwelling, external wall insulation, new windows and pergola.
Site Address:	Monksfield, 42c, Monkton Farleigh, Bradford On Avon , BA15 2QH
Case Officer:	Alex Edge

Recommendations:

☐	No Comment
☐	Support
☐	No objection
☐	Condition (no objection subject to conditions)
☒	Objection - further information required
☐	Objection in principle
☒	HRA (Bath and Bradford on Avon Bat SAC) completed

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date submitted)
1	Bat roost mitigation	CP50, W&C Act, Habitat Regulations	Development drawings showing specification and location of required bat mitigation	

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 your consultation on the above application. I have reviewed the submitted documents against OS maps, aerial photographs 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 and Preliminary Roost Assessment.(Arbtech, 13/10/2025).
- Bat Emergence and Re-entry Surveys (BERS). (Arbteh, 13/10/2025).
- Proposed Site plan. Drawing No: 588 – 3 002.

COMMENTS:

Surveys carried out by and reported in the submitted reports confirm that the main house (B1) supports a day roost for low numbers of common pipistrelle, Serotine and brown long-eared bats and garage (B2) supports a maternity roost for common pipistrelle bats.

Unmitigated the development would result in the damage to and loss of these bat roosts. Bats and their roosts are 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 bats are not adversely affected as a result of the proposed development must be submitted as part of the proposal, and shown on development drawings.

Development drawings that specify the location and type of bat mitigation are required.

The current proposal conflicts with Core Policy 50 of the adopted Wiltshire Core Strategy 2015 and Paragraphs 192 (b) and 193 (a) of the National Planning Policy Framework December 2024, because mitigation is not included in the proposal.

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 LPAs ecology team prior to determination of the application.

Habitat Regulations Assessment (HRA)

The application within multiple consultation zones for bats associated with the Bath & Bradford on Avon Bats Special Area of Conservation (SAC).

The submitted surveys strongly indicate that bat species for which the SAC is designated (SAC qualifying species) are not roosting on site. Surveys confirm the SAC qualifying species lesser horseshoe bat (LHB) and greater horseshoe bat (GHB) use the hedge at the northern boundary for commuting. The proposed changes are largely restricted the existing building footprint and the Proposed Site Plan shows this hedge will not be directly affected by the proposals.

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 combined with the separation of more than 800m between the SAC and the application site any temporary construction impacts and operational impacts would be de-minimus. **The HRA has concluded that the application is not likely to have significant impacts on the SAC and subsequently the application is screened out of Appropriate Assessment**

Biodiversity Net Gain

From 12 February 2024 Biodiversity Net Gain (BNG) became mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Based on the information available the biodiversity gain planning condition is not considered to apply to this application as the application is for development which is subject of a householder application within the meaning of article 2(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Note to case officer: you should be satisfied that the proposals meet the above criteria and act accordingly. Further information will be required from the applicant prior to determination in the event the application is considered to be subject to mandatory biodiversity net gain.

DRAFT CONDITIONS:

COMPLIANCE WITH SUBMITTED DOCUMENTS

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

- Site drawing/s [reference to be confirmed once the requested plan/s has been submitted to and approved by the LPA]
- Recommendations in Preliminary Ecological Appraisal and Preliminary Roost Assessment.(Arbtech, 13/10/2025).

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

Informative:

Bats

The roof space and garage of 42c Monksfield is used as a bat roost. Under the Conservation of Habitats and Species Regulations 2017 (as amended), it is an offence to harm or disturb bats or damage or destroy their roosts. Planning permission for development does not provide a defence against prosecution under this legislation. The applicant is advised that a European Protected Species Licence will be required before any work is undertaken to implement this planning permission. Future conversion of the roof space to living accommodation or replacing the roof could also breach this legislation and advice should be obtained from a professional bat ecologist before proceeding with work of this nature.

Protected Species

The applicant should note that under the terms of the Wildlife and Countryside Act (1981) and the Conservation of Habitats and Species Regulations 2017 (as amended) it is an offence to disturb or harm any protected species including for example, breeding birds and reptiles. The protection offered to some species such as great crested newts, extends beyond the individual animals to the places they use for shelter or resting. Please note that this consent does not override the statutory protection afforded to any such species. In the event that your proposals could potentially affect a protected species you should seek the advice of a suitably qualified and experienced ecologist and consider the need for a licence from Natural England prior to commencing works. Please see Natural England's website for further information on protected species.

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

Ecologist	Date