

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jessica Cracknell
Date:	19/01/2026
Application Number:	PL/2025/08886
Proposal:	Creation of a 3G Artificial Grass Pitch (AGP) with perimeter fencing, hardstanding areas, storage container, floodlights, an access footpath and associated bund
Site Address:	Recreation Ground, Leafy Lane, Corsham, SN13 0JT
Case Officer:	Isobella Wise

Recommendations:

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

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date submitted)
1	Bath and Bradford Bats SAC	Habs Regs, WCA, NPPF, CP50	19/01/2026 Evidence demonstrating functionality of the site for bats will be maintained. A plan with dark corridors along key bat habitat/ corridors clearly identified and buffered, in line with Bats SAC guidance. Evidence of Alignment with Corsham Batscape Strategy	NO
2	Biodiversity Net Gain (BNG)	Town and Country Planning Act 1990	19/01/2026 Submission of statutory metric calculation with the correct baseline habitats, condition assessments and associated baseline habitat plans.	NO

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.

The following submitted documentation was reviewed to inform this response:

- Phase II Bat Surveys. 24 October 2025. BJ Collins;
- Preliminary Ecological Appraisal (Extended) Report. 17 October 2025. BJ Collins.
- The Statutory Biodiversity Metric. 06 November 2025. V3;
- BNG Cover Report V3. 06 November 2025. BJ Collins;
- UKHab Habitat Map – BNG Baseline V1. 24 October 2025. BJ Collins;
- UKHab Habitat Map – BNG Proposed V1. 24 October 2025. BJ Collins;
- BNG Areas. 05 November 2025. Surfacing Standards Limited. Project No. G-231622. Drawing No. 11. Rev. 00;
- Arboricultural Impact Assessment. 20 November 2025. RPS Group Plc. 5413-RPS-XX-XX-RP-AR-9104. Version. P01;
- Playing Field Layout. 04 July 2025. Surfacing Standards Limited. Project No. G-231622. Drawing No. 10. Rev. 00;
- Proposed Site Plan. 04 November 2025. Surfacing Standards Limited. Project No. G-231622. Drawing No. 03. Rev. 00;
- Proposed Lighting Scheme. 13 June 2025. Surfacing Standards LTD. Project Code. G-231622;
- Sports Lighting Statement. 31 October 2025. Surfacing Standards Limited. SSL Project Code. G-231622;
- Floodlighting Scheme. 04 November 2025. Surfacing Standards Limited. Project No. G-231622. Drawing No. 06. Rev. 00;
- Spillage Comparison. 04 November 2025. Design and Access with Planning Statement. 31 October 2025. Surfacing Standards Limited. SSSI Project Code. G-231622;
- The Reduction of Obtrusive Light. 2021. Institution of Lighting Professionals. Guidance Note 01/21;
- Proposed Elevation. 04 November 2025. Surfacing Standards Limited. Project No. G-231622. Drawing No. 05. Rev. 00;
- Proposed AGP Plan. 04 November 2025. Project No. G-231622. Drawing No. 04. Rev. 00;
- Noise Management Plan. Surfacing Standards Limited. SSSI Project Code. G-231622;
- Topographical Survey. 04 November 2025. Surfacing Standards Limited. Project No. G-231622. Drawing No. 01. Rev. 00;

Bath and Bradford on Avon Bat Special Area of Conservation (SAC): Habitat Regulations Assessment (HRA)

The application site is located within a consultation zone for Bechstein's bats, Greater Horseshoe bats and Lesser Horseshoe bats associated with the Bath and Bradford on Avon Bats Special Area of Conservation (SAC) and therefore has potential to result in significant adverse impact on the special features of that site. Appropriate Assessment (AA) under Section 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) 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 site is assessed to offering significant suitability for foraging and commuting bats in the form of boundary hedgerows, scrub, scattered trees and woodland. The majority of activity recorded was from common and soprano pipistrelle, with records of noctule, brown long-eared, barbastelle, greater horseshoe, lesser horseshoe and Myotis species. The species assemblage indicates that the site is of importance for bats, with activity predominantly associated with boundary features. The proposed development must ensure that key habitat features are retained and that any loss is mitigated through habitat creation and management, with measures to maintain ecological connectivity for bats. Retained hedgerows across the site must be buffered and enhanced where possible to reduce fragmentation and support bat movement.

A lighting plan has been submitted in support of this application, Floodlighting Scheme (04 November 2025. Surfacing Standards Limited. Project No. G-231622. Drawing No. 06. Rev. 00); and Sports Lighting Statement (31 October 2025. Surfacing Standards Limited. SSL Project Code. G-231622); which identifies potential light spill calculations from the proposed development. The report confirms that flight lines along the northern boundary of the site will remain dark for foraging and commuting bats. It is acknowledged that the

updated lighting proposals represent a significant improvement over the existing lighting scheme, as demonstrated in the Spillage Comparison Plan (04 November 2025. Design and Access with Planning Statement. 31 October 2025. Surfacing Standards Limited. SSSI Project Code. G-231622). The revised floodlighting scheme has the potential to remove direct light spill onto the tree canopy along Boxfields Road, creating an approximate 5 metre buffer between the canopy and the 0.2 lux contour.

However, according to the Floodlighting Scheme Plan, light levels exceed 0.5 lux on the eastern hedgerow boundary. Whilst the hedgerows are retained, dark buffers are not specified (m) on the plans or reports therefore the application does not demonstrate that they will be adequately buffered from the development to ensure functionality will be maintained. To ensure ecological functionality for foraging and commuting bats is retained it is expected that an undeveloped continuous dark corridor is provided along key bat habitat. The new lighting scheme must be in line with the bats SAC guidance.

Corsham Batscape Strategy states that...*Although the habitat along the direct migration route shown on the phase 2 maps may appear poor, bats are still likely to be using the most direct route between key sites. As such, there needs to be an emphasis on avoiding lighting impacts and a reduction in habitat connectivity and also enhancing restoring habitat connecting along the direct migration routes wherever possible.* The application site is partially within the Braydon Forest Direct Mitigation Route, with Annex II species recorded utilising the boundary features. The strategy states that development can proceed in these areas where adequate mitigation can be put in place to ensure the retention of the functionality of the habitat.

The Corsham Batscape Strategy advises that bat habitat features should be buffered considerably from development to secure appropriate light levels, with reference to the Bat SAC Planning Guidance for Wiltshire (September 2015), which recommends a minimum buffer distance of 15 metres.

The applicant should ensure that at this site aligns with the Corsham Batscape Strategy, further information can be found here: [sppnp-corsham-batscape-strategy-reduced.pdf](https://www.sppnp.co.uk/corsham-batscape-strategy-reduced.pdf).

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.

An increase in artificial lux levels can deter bats which could result in roost abandonment and/or the severance of key foraging areas. This will likely result in a significant negative impact upon the health of bat populations across the region. Artificial light at night can have a substantial adverse effect on biodiversity. Any new lighting should be for the purposes for safe access and security and be in accordance with the appropriate Environmental Zone standards set out by the Institute of Lighting Engineers in their publication GN01:2021, 'Guidance for the Reduction of Obtrusive Light' (ILP, 2021), and Guidance note GN08/23 "Bats and artificial lighting at night", issued by the Bat Conservation Trust and Institution of Lighting Professionals.

The floodlights are proposed to be used between the hours of 09:00 and 22:00 hours, only at times of the year when daylight is fading or it has gone dark. A condition will be required to secure these operating hours.

Biodiversity Net Gain (BNG)

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 (06 November 2025. V3) confirming the baseline and predicted post-development biodiversity units of the site has been submitted (including the condition assessment sheets and baseline habitat maps).

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

- **The UKHab Habitat Map – BNG Baseline V1 (24 October 2025. BJ Collins) records 'Developed land; sealed surface' within the baseline habitats. However, the Statutory Biodiversity Metric (06 November 2025. V3) does not identify 'Developed land: sealed surface' within the baseline. To ensure accuracy and compliance, the baseline habitat types recorded within the statutory**

biodiversity metric and the accompanying habitat maps must align and, where necessary, amended to reflect the habitats actually present on site.

Note to case officer: The Statutory Biodiversity Metric calculation (06 November 2025. V3) does not provide information on how the development will achieve 10% BNG. 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.

Core Policy 50

Core Policy 50 of the Wiltshire Core Strategy requires all development to demonstrate no net loss of biodiversity and for major applications the expectation is that development will deliver biodiversity gains. The NPPF also encourages applications to deliver measurable net gains (para 180 d).

CP50 and NPPF requires the inclusion of biodiversity enhancements, such as bird and bat boxes. Further details should be provided on the number and types of bird and bat boxes to be included, and the location of these enhancements must be included in the site plan drawings and will become an enforceable part of the planning permission. Bird/bat boxes will continue to be available for bats/birds for the lifetime of the development. Please see condition below.

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.

DRAFT CONDITIONS: these will be finalised once the issues above have been addressed

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

Ecologist	Date