

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	22/01/2026
Application number:	PL-2025-09796
Proposal:	Variation of conditions 2, 3, 5 and 6 of planning permission PL/2023/06091 for the retention of extended outside storage space, together with the removal of a section of bund.
Site address:	Ox House Farm, Devizes Road, Rowde, Devizes, SN10 2LU
Case officer:	Hilary Quixley

Recommendations:

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

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:

- Planning Statement, RCC Town Planning Consultancy, undated
- Site Plan

The site comprises a yard used by a waste management company. Previous planning permission (PL/2023/06091) was granted for "Change of use to a mixed-use site comprising agriculture and B8 storage (including open storage) and replacement of existing areas of hardsurfacing". Since then, some works further to the approved plans have been undertaken, namely extensions to storage space and hardstanding. The current application seeks permission for the variation of conditions 2, 3, 4 and 6 of PL/2023/06091, which would enable the retention of an extended outdoor storage area, and the removal of section of a man-made bund (retrospective). A separate application has been submitted concerning the retrospective installation, and the continued used, of a mobile cabin, as well as use of the hardstanding parking area.

COMMENTS:

An internal bund has been removed which, as per the plans, appeared to fall within the central area of the site. The bund – on aerial imagery – may have comprised a scrubby area, therefore there has been some loss of habitat. This may have been of limited ecological value, given its setting within the centre of a busy yard, surrounded by hardstanding on either side.

The current proposals seek amendments to the landscaping plans approved under PL/2023/11104 to discharge Condition 4. This involves relocating the proposed tree planting. It is not clear whether any additional plantings are proposed to accommodate for the loss of the vegetated bund.

Despite this proposal being exempt from BNG requirements (see below), Core Policy 50 of the Wiltshire Core Strategy requires all development to demonstrate no net loss of biodiversity and to seek opportunities to enhance biodiversity. The NPPF also encourages applications to deliver measurable net gains (para 193d). The site is well-connected to good habitat for bats and nesting birds (with grassland fields connected via hedgerow surrounding in all directions). As such, since that there has been some loss of green habitat (albeit minor, though the details are unclear), in line with CP50, **a condition for biodiversity enhancement is recommended.**

Bath and Bradford-on-Avon Bats Special Area for Conservation (SAC)

The site is located at the edge of a Lesser Horseshoe core roost buffer (consultation zone) associated with the Bath and Bradford-on-Avon SAC. The current proposal therefore has potential to result in significant adverse impact on the special features of the Bath and Bradford-on-Avon SAC.

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 currently proposed development which:

- (i) involves no works impacting any existing roof, tree or other suitable roosting structure, therefore having a very low risk of impacting any bat roost;
- (ii) does not propose any removal of core bat habitat;
- (iii) does not propose any additional external lighting, and
- (iv) will not result in a notable increase in levels of human disturbance further to the existing,

there is no mechanism for adverse impact on the Conservation Objectives of the SAC, and the proposal can be screened out of Appropriate Assessment. *Please note, the points listed above are applicable to the retrospective plans.*

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 proposal is for retrospective development, i.e. the planning application relates to development to which section 73A of the Town and Country Planning Act 1990 (planning permission for development already carried out) applies.

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.

CONDITIONS:

1. Enhancements for Biodiversity

Within six months of the granting of planning permission, plans showing the design and locations of ecological enhancements – such as bat and/or bird boxes – and including evidence of installation of said enhancements, shall be submitted to the local authority for approval.

REASON: To provide mitigation/enhancement for biodiversity.

Informative – Artificial Lighting

The habitat surrounding the proposed development site is suitable for foraging and commuting bats. 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 GN08-18 "Bats and artificial lighting in the UK", issued by the Bat Conservation Trust and Institution of Lighting Professionals.

Note to Case Officer: It is acknowledged that this application is retrospective, and therefore a pre-commencement condition for securing biodiversity enhancements will not be possible. Please amend the suggested trigger above ("within six months") as considered appropriate.

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

Ecologist Abi Gazzard	Date 22/01/2026
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