

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	18/08/2025, 17/11/2025, 27/01/2026
Application number:	PL/2025/00965
Proposal:	Outline planning application for the erection of 2No. dwellings with all matters reserved apart from access and layout.
Site address:	Home Farm, Shaw Hill, Shaw, Melksham, SN12 8EW
Case officer:	Isobella Wise

Recommendations:

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

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date)
	No information provided on bat mitigation	-Wiltshire CP50 -NPPF -W&CA 1981 (as amended) -Habs. Regs. 2017	14/08/2025 The applicant's ecologist/s have identified at least two bat roosts on site, which will be lost during the proposed works. We will need to see details of proposed compensation/new bat roosts, to ensure the planned development can support sufficient mitigation for bats.	17/11/2025 YES Ecological Method Statement, BatCraft, 13/09/2025 and Proposed Site Plan, 320/102 Rev BC, Poulson, May 2024 [NB. Redline boundary updated since previous consult]
	BNG	- Environment Act 2021	27/01/2026 Updated BNG information to align with revised redline boundary	

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

The following submitted documentation was reviewed to inform this response:

- Planning Statement, Poulson Architectural Design and Planning Services
- Proposed Site Plan, Poulson Architectural Design and Planning Services, ~~Revision B~~ **Revision C**, May 2024
- Preliminary Ecological Appraisal and Roost Assessment, Arbtech, 22/08/2024
- Emergence Surveys, BatCraft, 13/07/2025
- Statutory Biodiversity Metric, Katie Whitfield, 12/11/2024, updated (no date)
- Biodiversity Net Gain Assessment, Arbtech, 12/11/2024, updated 04/08/2025
- Ecological Method Statement, BatCraft, 13/09/2025

The site comprises an area of land used for storage, containing two existing buildings, as well as hardstanding, hedgerow, scattered trees and grassland. The wider area contains grassland fields, residential properties and lines of trees/hedges. It is proposed to remove the buildings and construct two dwellings.

My second comments are shown in blue, following the submission of updated site plans, BNG documents and an Ecological Method Statement.

This re-consultation follows the submission of a revised redline boundary which enables BNG to be delivered on-site. However, it does not appear that any new BNG documents have been submitted. This was checked with the Case Officer on 14/01/2026 and, having checked the planning portal today (27/01/2026), I still cannot see any updated BNG information. As such, my third comments, in red, are provided here.

Matters Considered:

Protected species and habitats

Bats

Ecology surveys as listed above, identified no actual or potential roosting features in the trees within or immediately adjacent the site. However, evidence of bats (droppings and discarded insect wings) was observed inside both buildings during the preliminary roost assessment (on 22/08/2024; Arbtech), thus, three emergence surveys were undertaken in May-June 2025 (BatCraft). No bats were recorded emerging from the buildings during these surveys. Droppings were still present in the buildings during the latter surveys, but it is not clear whether these were considered old or new. DNA analysis on the droppings from the preliminary roost assessment provided a result of Brown Long-eared Bats, as well as an inconclusive result.

The Emergence Survey report states that the evidence indicates use of the building/s as a feeding perch, and/or summer roost. It also states “The roost is of low conservation significance, important only at the site level, so no EPSL from Natural England is needed” and that “an ecological method statement must be implemented in order for the works to be legally undertaken”. However, it is not clear whether the applicant intends to seek an alternative mitigation licence, such as a Bat Mitigation Class Licence or Earned Licence. **The applicant is advised that under the Conservation of Habitats and Species Regulations 2017 it is an offence to damage or destroy bat resting places (including when bats are not present), and a mitigation licence will be required as the proposed works will result in the destruction of at least two bat roosts.**

No compensation measures (e.g., replacement roosts) have been shown within the planning documents nor suggested within the ecology reports. The applicant needs to provide plans showing compensation and enhancement for bats prior to determination of the application. At present, without this information, the council cannot determine whether the development can accommodate the necessary mitigation required for the replacement of bat roosts. It should be noted that for Brown Long-eared bats, mitigation might involve a void-type roost replacement and the applicant should consult with their ecologist for specific advice.

Thank you for the revised site plan which shows biodiversity enhancements (drawing 320/102, revision B) (*Note for Case Officer: this plan was submitted by email and does not yet appear to have been included with the application files*). The revised plan shows the locations of three bat tubes which are known to be suitable for use by Brown Long-eared bats, providing sufficient opportunities for the type of roost that may be lost (low number of individuals in a day roost) in line with the Bat Mitigation Guidelines (v1.2, CIEEM).

A bat method statement has also been provided. This sets out suitable mitigation including a pre-commencement check, supervised roof stripping and appropriate work timings. **Compliance with all documents detailing bat mitigation and compensatory roosts should be secured via a condition.**

The habitat within and surrounding the site is suitable for roosting, foraging, and commuting bats, as demonstrated in the Emergence Survey report. Artificial light at night can have a substantial adverse effect on biodiversity. An increase in artificial lux levels can deter bats which could result in roost abandonment and/or the severance of key foraging areas. New lighting should therefore 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. **An appropriate lighting plan should be secured via a condition.**

Nesting birds

The adults, young, eggs and nests of all species of birds are protected by the Wildlife and Countryside Act 1981 (as amended) while they are breeding. Please be advised that works should not take place that will harm nesting birds from March to August inclusive. The Preliminary Ecological Appraisal noted the presence of several old bird nests within the buildings' interiors. **The applicant is advised to check the buildings prior to demolition, as well as vegetation prior to removal.**

Other species and habitats

There are some habitats on site suitable for use by reptiles, amphibians and badgers, including native hedgerows, ruderal vegetation and a tall sward. The surrounding land also provides suitable refuge and habitat for these species to disperse into. **The precautionary methods outlined in the Preliminary Ecological Appraisal – including a pre-commencement inspection and site clearance guidance – will minimise any risk posed to these species, and compliance to this mitigation should be secured via a condition.**

Two hedgerows on site are to be removed. The site is well-connected to grassland to the east and west, with scattered trees, hedgerow and woodland areas further beyond, and a County Wildlife Site (Norrington Common) approximately 500m south. Note that Core Policy 50 of the Wiltshire Core Strategy requires all development to demonstrate:

- (i) No net loss of local biodiversity resource and

(ii) Secure the integrity of local ecological network

Habitats created as Biodiversity Net Gain (BNG) within the site should seek to improve primary connectivity within the site and into other habitat areas, with particular focus on retaining and improving functionality of the habitats within the site for wildlife species within the local area.

At present, the only greenspace indicated on the proposed plans appears to comprise enclosed private gardens, and the plans do not detail any habitat enhancements that will help to maintain connectivity within and beyond the site. The Reserved Matters application for this site should demonstrate how the site will remain permeable to wildlife (e.g., through the addition of hedgerow rather than fencing) and continue to provide functional habitat for nesting birds, foraging bats and other wildlife, in conjunction with the improvements that will be achieved via BNG.

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, K. Whitfield, 12/11/2024), map and habitat condition assessments (Biodiversity Net Gain Assessment, Arbtech, 12/11/2024) confirming the baseline and predicted post-development biodiversity units of the site have been submitted.

It is understood that the metric calculation has since been revised to remove a boundary hedgerow (ornamental) which falls outside of the applicant's ownership (Statutory Biodiversity Metric, Katie Whitfield, 12/11/2024, updated (no date); Biodiversity Net Gain Assessment, Arbtech, 12/11/2024, updated 04/08/2025).

~~Information in the completed on-site baseline habitat tabs is accepted as accurate based on the information submitted. The pre-development (baseline) situation is summarised below.~~

On-site pre-development (baseline) biodiversity value	0.57 Habitat units
	1.08 1.04 Hedgerow units
	0.00 Watercourse units
Are there any <u>irreplaceable</u> habitats on-site?	No
Has any habitat <u>degradation</u> of occurred?	No

~~Confirmation of how the development will achieve BNG is a post-determination matter, though consideration should be given to how any proposed BNG will be secured. Post-development habitat creation and/or enhancements are not included in the submitted BNG documents. However, the revised Proposed Site Plan shows some area of land within a blue line boundary denoted as "Proposed Onsite BNG".~~

~~All land located outside the redline application boundary of the development site is considered off-site (Make off-site biodiversity gains as a developer – GOV.UK).~~

~~All off-site biodiversity gains sites must be registered on the national biodiversity gains site register. Guidance on how to register a biodiversity gains site including a list of items required to~~

~~apply can be found here: [Register a biodiversity gain site – GOV.UK](#). In order for the Biodiversity Gain Plan condition to be discharged, all off-site gains must be shown on the Biodiversity Gain Plan as allocated to this development on the national biodiversity gains site register.~~

~~Off-site gains must be secured via a legal agreement for at least 30 years. This must be a planning obligation (Section 106 agreement) or conservation covenant. Wiltshire Council will not enter into a Section 106 agreement for off-site gains unless the off-site gain site has been verified. Contact ecologychargeableservice@wiltshire.gov.uk to request further information on site verification.~~

The site's redline boundary has been amended to include the previously proposed areas of off-site BNG. As such, the baseline habitat calculations will need to be updated. Please can the applicant provide updated BNG documents, as appropriate?

CONDITIONS

1. Compliance with submitted documents

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

- Ecological Method Statement, BatCraft, 13/09/2025
- Ecological enhancements and mitigation shown on the Proposed Site Plan, 320/102 Rev C, Poulson, May 2024
- Precautionary mitigation detailed for birds, badgers, reptiles, amphibians and 'other' in the Preliminary Ecological Appraisal and Roost Assessment, Arbtech, 22/08/224

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

2. Artificial lighting

No external light fixture or fitting will be installed within the application site unless details of existing and proposed new lighting have been submitted to and approved by the Local Planning Authority in writing. The submitted details will demonstrate how the proposed lighting will impact on bat habitat compared to the existing situation. The plans will be in accordance with the appropriate Environmental Zone standards set out by the Institution of Lighting Professionals (ILP) Guidance Notes on the Avoidance of Obtrusive Light (GN 01/2021) and Guidance note GN08/23 "Bats and artificial lighting at night", issued by the Bat Conservation Trust and Institution of Lighting Professionals.

REASON: To avoid illumination of habitat used by bats.

INFORMATIVE – bats

There is evidence that the site is used by roosting bats. 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 that will damage or destroy roosts. If bats or evidence of bats is found during the works, the applicant is advised to stop work and follow advice from an independent ecologist.

Final sign off – all matters addressed:

Ecologist	Date
Abi Gazzard	

