

Council Planning Consultation Response

ECOLOGY

Officer name:	Elizabeth Burrows, Senior Ecologist
Date:	16/02/2026
Application No:	PL/2025/07781
Proposal:	Proposed Glamping Pods (4 No.)
Site Address:	Home Farm, Rood Ashton, West Ashton, Trowbridge, BA14 6BL
Case Officer:	Andrew Thomas

Recommendations:

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

Assessment with a positive conclusion is required and must be sent to Natural England, who must agree the conclusion (within 21 days) prior to this application being permitted.

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date submitted)
1	Bath and Bradford on Avon Bat SAC	Habitats Regulations, CP50, NPPF	Bat Mitigation Scheme TWBMS contributions: Grey hatched recreation pressure zone £3,700 (£925 per cabin). Yellow Zone habitat mitigation £3,888.12 (£972.03 per cabin)	
2	Priority Habitat Deciduous Woodland	CP50, NPPF	Wildlife mitigation and enhancement plan/ or alternative	

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:

- Proposed Glamping Pods On Land at Home Farm, Rood Ashton, Trowbridge, Wiltshire, BA14 6BL. (IPC Town and Country Planning Development Consultants, September 2025).
- Pod Plan and Elevations. Drawing Number LPC 5894 PR 102 A. (IPC Town and Country Planning Development Consultants, October 2024).
- Location Plan. Drawing Number LPC 5894 EX 101 A. (IPC Town and Country Planning Development Consultants, June 2025).

- Preliminary Ecological Appraisal. (Herdwick Ecology, July 2025).

COMMENTS:

I have been advised by the Case Officer and the applicant's ecologist that the layout is being revised; therefore, it is not appropriate to provide detailed comments on the submitted plans as they are to be superseded. The comments below are provided in anticipation of amendments to the layout and highlight the key ecological constraints and the mitigation measures that will need to be addressed.

Please reconsult Ecology once the revised plans have been submitted.

The Preliminary Ecological Appraisal identifies the affected habitats as modified grassland of low ecological value and considers significant impacts on protected species, other than bats, to be unlikely. The site does lie adjacent to habitat functionally linked to areas of high bat value, including qualifying species of the Bath and Bradford on Avon Bat SAC.

In the absence of detailed bat activity surveys, the existing woodland, tree scrub and connecting grassland must be treated as core bat habitat under the TWBMS, and precautionary mitigation must ensure no net loss of bat foraging or commuting habitat is required.

The applicant must also address the issues raised in Natural England's response.

Habitats Regulation Assessment (HRA)

Salisbury Plain SPA

This application lies within the 6.4km zone of influence of the Salisbury Plain SPA and in light of the HRA for the Wiltshire Core Strategy and the HRA for the Wiltshire Housing Site Allocations Plan it is screened into Appropriate Assessment due to the potential impact of recreational pressure on stone curlew in combination with other plans and projects.

A strategic Appropriate Assessment (AA) has been prepared pertaining to development within the 6.4km zone of influence that could result in a likely significant effect on the SPA as a result of an increase in recreational / visitor pressure. The AA reached a conclusion of no adverse effects on the integrity of the SPA or its qualifying features provided that the council's mitigation strategy continues to be implemented. Annual stone curlew monitoring and protection measures continue to be secured by the Council.

In January 2026 Natural England (NE) confirmed that the 2026 strategic AA for Salisbury Plain SPA continues to be supported by NE.

Bath & Bradford on Avon Bats SAC

The application site is within multiple consultation zones for bats associated with the Bath & 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 application site is located within the 'grey hatched' recreational zone of the Trowbridge & Westbury Bat Mitigation Strategy (TWBMS) and therefore has potential to result in significant adverse impact on the special features of the Bath & Bradford on Avon Bats Special Area of Conservation (SAC) due to increased recreational impact on woodland habitats known to support SAC qualifying species of bat.

New residential development proposals within the grey hatched medium recreational risk zone will be expected to provide a financial contribution of £925 per dwelling towards the council's strategic recreational pressure mitigation scheme. This is to be secured via section 106 agreement (s106), a section 111 (s111) agreement or unilateral undertaking (UU) (legal fees will apply).

The application site is located within the yellow medium risk zone of the Trowbridge & Westbury Bat Mitigation Strategy (TWBMS). The yellow medium risk zone represents the areas where habitat has been shown to be of importance, or is highly likely to be of importance for bats associated with the Bath and Bradford-on-Avon Bat SAC, and in particular the yellow zone takes into consideration the foraging areas and flightlines of horseshoe species and Bechstein's bats and is anticipated to be able to accept a degree of development pressure provided applications are designed in accordance with the principles in the TWBMS. Impacts will arise on individual sites and in-combination with other sites as a result of loss and/degradation of habitat of importance to the qualifying bats.

All greenfield site residential apps within this zone are subject to S106 contributions as follows:

Each dwelling contributes £972.03 per dwelling (index linked from 2018) to be paid before commencement towards habitat mitigation detailed in Section 9 of the TWBMS.

The cost of mitigation via the Council's strategic Trowbridge and Westbury Bat Mitigation Strategy would be:

Grey hatched recreation pressure zone £3,700 (£925 per cabin).

Yellow Zone habitat mitigation £3,888.12 (£972.03 per cabin)

The mitigation is required prior to the commencement of development and must be secured by planning obligations.

Where a Section 106 agreement is not in place, mitigation can alternatively be secured under Section 111. Where the applicant elects to use a S111, the strategic mitigation must be secured upon the granting of planning permission by completion of S111 process.

The site and adjacent habitats (woodland and tree belts) are very likely to be of high value for foraging and commuting bat SAC qualifying species due to their location within a Bechstein's bat 1.5 km Core Roost Buffer (approximately 770 m from Biss Wood, which supports a Bechstein's bat maternity colony), within 560 m of a known lesser horseshoe bat maternity roost, and directly adjoining high-quality foraging and commuting habitat.

The introduction of human disturbance, including but not exclusively artificial lighting and recreational activity, has the potential to result in the loss or degradation of foraging and commuting habitat used by qualifying SAC bat species.

In the absence of detailed bat activity surveys, the existing woodland and tree scrub must be treated as core bat habitat (as defined by the TWBMS) and the precautionary principle should therefore be applied to ensure no net loss of bat foraging and commuting habitat. **A bat mitigation scheme demonstrating that the development would not result in adverse impact on the foraging and commuting functionality of these habitats is required.**

The scheme must include a plan showing how existing bat habitat will be buffered from the development and how connectivity across the site to habitats and features in the wider landscape will be maintained in accordance with the TWBMS. The buffers must be in broad accordance with Figure 6 of the TWBMS, proportionate to the development impacts and managed to benefit bats. The plan must clearly specify the location, extent, and environmental requirements of these buffers.

If lighting is proposed a sensitive lighting strategy to demonstrate that there will be no increase in lighting, including from within the glamping pods must be submitted or required by condition.

Priority Habitat (Deciduous woodland)

Kennel Wood lies adjacent to the site and is mapped as Priority Habitat Deciduous woodland. The introduction of human disturbance, including but not exclusively artificial lighting and recreational activity, has the potential to result in the loss or degradation of this woodland.

Mitigation that ensures no adverse impact on this habitat must be provided. It would be acceptable for this mitigation to be specified on the requested bat mitigation scheme.

Habitat creation and enhancement measures that improve connectivity between existing woodland and tree belts and other measure that seeks to deliver biodiversity enhancement as recommended in the PEA would be welcomed. It would be acceptable for these measures to be shown on the requested bat mitigation scheme or separate wildlife mitigation and enhancement plan.

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 confirming the baseline and predicted post- development biodiversity units of the site has been submitted however it must be amended to reflect the revised plans.

Applications subject to the biodiversity gain condition must be accompanied by minimum information set out in Article 7 of The Town and Country Planning (Development Management Procedure) (England) Order 2015, which includes:

- the completed metric calculation tool showing the calculations of the pre-development biodiversity value of the onsite habitat on the date of application (or proposed earlier date) including the publication date of the biodiversity metric used to calculate that value;
- a description of any irreplaceable habitat (as set out in column 1 of the Schedule to the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) on the land to which the application relates, that exists on the date of application, (or an earlier date); and
- plan(s), drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application (or earlier proposed date), including any irreplaceable habitat (if applicable).

Note: this is a summary, please refer to Paragraph: 011 Biodiversity net gain - GOV.UK for full details

DRAFT CONDITIONS:]

Compliance with Submitted Documents

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

Bat Mitigation Strategy [TBC]

Development Layout Plan [TBC]

Landscape plans [TBC]

Any other relevant documents including Landscaping, Drainage etc that are relevant

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

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 and to ensure lighting meets the requirements of the Trowbridge Bat Mitigation Strategy and the Habitat Regulations Assessment

Informative:

General 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 bats, 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