

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	18/02/2026
Application number:	PL/2026/00222
Proposal:	Proposed New Dwelling & Associated Landscaping
Site address:	115 Station Road, Westbury, BA13 4HN
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

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date)
1.	Bats and protected sites (Bath and Bradford on Avon Bat SAC)	Habitat Regulations, CP50, NPPF	18/02/2026 -Mitigation and enhancements for bats shown on plans -Confirmation of whether new lighting is proposed, and, if so, a lighting plan	
2.	County Wildlife Site	CP50, NPPF	18/02/2026 -Details of precautionary working measures and appropriate 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 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:

- Existing and proposed site plan, drawing AH2025/80, A Harlow & Son, February 2026
- Existing and proposed site plan SUPERSEDED, drawing AH2025/80, A Harlow & Son, November 2025
- Design & Access Statement, A Harlow & Son, undated
- Ecology & BNG Assessment, ABR Ecology, January 2026

- Statutory Biodiversity Metric, Amy Parsons, January 2025

The site comprises a plot of land to the rear of an existing semi-detached dwelling. It is proposed to construct a new dwelling and associated access and parking, which will involve the removal of a shed and garage. The site is surrounded by a lake 14m to the north and west, residential properties to the south, and a pub to the northeast. There is a railway corridor 30m south.

COMMENTS:

Salisbury Plain Special Protection Area (SPA) 6.4km buffer

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 and Bradford on Avon Bat Special Area of Conservation (SAC)

The application site is located within the grey zone of the Trowbridge & Westbury Bat Mitigation Strategy (TWBMS) and a Greater Horseshoe core roost buffer 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 the SAC. 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.

Recreational pressure

The grey medium risk zone represents an area where new residential development is likely to result in increased recreational use of important woodland bat sites. In order to conclude the AA favourably, new residential development proposals for 49 dwellings or less within the grey hatched medium risk zone will be expected to provide a financial contribution of £925 per dwelling towards the Council's strategic recreational pressure mitigation scheme.

For this development, the cost of mitigation via the Council's strategic scheme would be £925 for the 1 dwelling. 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.

Potential impacts on bat habitat

The two small buildings to be removed (shed and garage) were assessed as being of negligible potential for roosting bats. The site contains small areas of modified grassland (managed as garden lawn) and bramble scrub (habitats totalling <0.02ha) and hedgerow (<0.03km). The hedgerow will be retained, but grassland and scrub will be removed. Insufficient habitats will be

created/enhanced to achieve no net loss onsite, and the plans show that almost the entire plot will be converted into artificial surfaces.

The site is well-connected to valuable habitats such as the lake to the north and west (a County Wildlife Site), which is bordered by a large parcel of woodland, as well as the railway corridor, also bordered by woodland, to the southeast. A Lesser Horseshoe roost has been recorded ~770m north. Overall, it is likely that Annex II species are using habitats surrounding the site, and potentially also making use of the site's connecting habitats between, e.g., the lake and railway corridor.

It is therefore requested that the applicant demonstrates that sufficient mitigation and enhancement for bats can be delivered on-site. For example, new native-species hedgerow planting could be incorporated at the site boundaries, and the area of green space in the northern half of the plot (currently shown as entirely hardstanding) could be increased. The inclusion of bat roosting features, to be shown on plans, would also be welcomed.

Artificial lighting introduced post-development (and during) may cause disturbance to bat flight paths and foraging activity. The applicant must confirm whether any new lighting is proposed. If new external lighting is proposed, then a lighting plan will be required to demonstrate:

- Location, type, number, and specification of all external light sources
- Demonstration that the surrounding habitats will remain unlit (≤ 0.5 lux)

The approach to lighting for new development, including lighting survey, should be undertaken in accordance with Guidance Note 08/23 Bats and Artificial Lighting at Night (Bat Conservation Trust and Institution of Lighting Professionals, 2023).

Insufficient information has thus far been submitted to enable the AA to be completed successfully, which must be completed and the conclusion agreed with Natural England prior to the application being determined.

County Wildlife Site

Westbury Lakes County Wildlife Site (CWS) lies ~14m from the application site boundary. A significant area of the site's habitats will be lost to the proposed building and driveway, with the area of the site closest to the CWS to comprise access and a parking area, and the house being further surrounded by proposed hardstanding/patio. Mitigation for, e.g., runoff into the CWS, light spill and other forms of pollution, has not been considered.

Wiltshire Core Policy 50 requires that CWSs are protected from the effects of development and should be enhanced where possible. It states: "*Sustainable development will avoid direct and indirect impacts upon local sites through sensitive site location and layout, and by maintaining sufficient buffers and ecological connectivity with the wider environment.*" In line with the NPPF and with CP50, applications must also ensure that no net loss of functional habitat for the benefit of wildlife in the local area will occur as a result of the proposed development. Additionally, gains for biodiversity, relevant to local habitats and wildlife populations, should form part of the proposed development.

Details of precautionary working measures and mitigation are required to support this application. Appropriate mitigation and enhancement could include a vegetation buffer between the site and the CWS.

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, condition assessments and maps ('Ecology & BNG Assessment, ABR Ecology, January 2026'; 'Statutory Biodiversity Metric, Amy Parsons, January 2025') stating the baseline and predicted post-development biodiversity units of the site have been submitted. Since the metric was submitted, the site layout has changed slightly. However, this is understood not to have impacted the BNG calculations, as the metric already includes 100% loss of grassland and scrub.

The pre-development (baseline) situation is summarised below.

On-site pre-development (baseline) biodiversity value	0.14 Habitat units
	0.03 Hedgerow units
	0.00 Watercourse units
Are there any irreplaceable habitats on-site?	No
Has any habitat degradation of occurred?	No

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.

The submitted metric indicates 0.25 biodiversity units or less will be required to meet the 10% BNG requirement and that on-site BNG is not achievable. In these circumstances, statutory credits can be bought without providing evidence that insufficient off-site options are available in England. For further information, please refer to guidance on Statutory Biodiversity Credits on the GOV.UK website (<https://www.gov.uk/guidance/statutory-biodiversity-credits>) under 'How to prove statutory credits are needed'.

However, as above, it is advised that the plans are revised to demonstrate greater gains on-site, to enable favourable conclusion of the AA.

IN SUMMARY: 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.

CONDITIONS: wording to be provided once above issues addressed

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

Ecologist	Date
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