

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	23/02/2026
Application number:	PL/2025/05597
Proposal:	Proposed construction of new steel framed and metal clad Agricultural Storage and Livestock Barn with an area of 620sq metres
Site address:	Willow House, Cold Harbour, Great Hinton, Trowbridge, BA14 6EA
Case officer:	Julie Mitchell

Recommendations:

☐	No Comment
☐	Support
☐	No objection
☒	Condition (no objection subject to conditions)
☐	Objection - further information required
☐	Objection in principle
☒	HRA completed. Appropriate Assessment with a positive conclusion has been sent to Natural England must agree the conclusion (within 21 days) prior to the application being permitted.

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:

- Design and Access Statement, Rev A, Hodges Associates, June 2025
- Ecological Impact Assessment, Avon Ecology, December 2025
- Biodiversity Net Gain Report, Avon Ecology, December 2025
- Statutory Biodiversity Metric, Avon Ecology, November 2025
- Proposed Site Plan 2504-A3 revision A, Hodges Associates, July 2025

The site comprises pasture bordered by hedgerow and a ditch to the south. It is proposed to construct a steel-framed barn and associated access (a driveway and turning/parking area in front of the barn). The site is neighboured by agricultural fields in all directions, with a parcel of woodland at the southeast corner.

COMMENTS:

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

The application site is located within the **grey** and **yellow** zones of the Trowbridge & Westbury Bat Mitigation Strategy (TWBMS), as well as partially within a Bechstein 1.5km Core Roost Buffer, 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). The application must be considered under the Habitats Regulations.

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. This application does not concern residential development, therefore, a financial contribution towards the council's strategic recreational pressure mitigation scheme is not required.

The yellow medium risk zone represents areas where habitat has been shown to be of importance, and in particular takes into consideration the foraging areas and flightlines of horseshoe 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. In order to conclude the AA favourably, applications impacting greenfield land and bat habitat are expected to provide a S106 contribution prior to commencement of £972.03 per dwelling or £29,137.50 per hectare towards habitat mitigation detailed in Section 9.1 of the TWBMS.

As required by the Conservation of Habitats and Species Regulations 2017 (as amended) an Appropriate Assessment must be carried out by the LPA, and in this case, against the TWBMS criteria (see below). **The AA has been sent to Natural England (26/02/2026) and the application must not be determined until they have agreed with the LPA's conclusion.**

APPROPRIATE ASSESSMENT FOR APPLICATIONS FALLING WITHIN THE YELLOW ZONE AND GREY ZONE OF The Trowbridge and Westbury Bat Mitigation Strategy

Item	TWBMS criteria	Details provided for Application
1	Did the application seek pre-application advice to establish the extent to which the TWBMS will drive layout and design of the development. Note this is not crucial to a favorable AA.	Pre application advice has not been sought.
	<u>Greenfield sites in Yellow Zone</u>	
2	Surveys should be completed: • In accordance with Council pre-application advice if provided • In accordance with BCT Good Practice Guidelines and the specifications described in Section 6 of the TWBMS • Could mating sites have been overlooked (survey April and October for male roosts)	<i>Ecological Impact Assessment, Avon Ecology, December 2025</i> <i>Biodiversity Net Gain Report, Avon Ecology, December 2025</i> The site contains pasture, which will be of value to species such as Greater Horseshoe and Bechstein's bats. The site is bordered by hedgerow, and a ditch with trees and scrub, which is likely to provide good commuting and foraging habitat. Bat activity surveys have not been undertaken, and therefore in the absence of bat surveys, the LPA assumes the habitats will be used by SAC species.
3	Masterplan to be provided which covers entire allocation or large application and shows: • Core Bat Habitat features. • Layouts demonstrating that housing numbers are compatible with constraints. • That sufficient land can be set aside to achieve no net	This is a minor application and a masterplan is not required.

	loss of habitat (Table 7.1). • Wide swathes of unlit bat habitat with associated buffer zones are provided ensuring landscape permeable to commuting bats is maintained.	
4	<u>Outline applications on green field sites in Yellow Zone</u>, Ecological Parameters Plan (para 161) to include: • Specific site design measures/restrictions to deliver the development. • Demonstrate compliance with TWBMS standards for habitat mitigation (Section 8.2). Including the location and extent of required Zones A and B. • No loss of core bat habitat (roosting or foraging). • Wide swathes of unlit bat habitat with associated buffer zones ensuring landscape permeable to commuting bats.	This is a full planning application and an EPP is not required.
5	<u>Greenfield Sites in the Yellow Zone</u>. Statutory Biodiversity Metric demonstrating no net loss. The calculation is supported by pre and post development maps. The post development maps align with other plans and drawings.	A Statutory Biodiversity Metric has been provided, demonstrating no net loss on-site. Thirty new native trees are proposed, to be planted parallel to the existing ditch boundary. Further enhancement is shown on the revised site plans, to include the creation of a wildlife area (between the proposed tree line and ditch) and a pond, suitable details of which will need to be secured via a LEMP condition.
6	<u>For reserved matters and full applications on green field sites in Yellow Zone</u>, an Ecological Mitigation Plan to be submitted containing (para 162): (i) Scaled drawing to show • Details of replacement roosts. • Core bat habitat (foraging and commuting) to be retained, created and enhanced. • Location/extent and full landscape specifications for tree and shrub planting, wildflower	The Proposed Habitat Map (Appendix C of the BNG Report) shows the locations of new tree planting and two bat boxes. The report clarifies that the tree species will include, but will not be limited to, alder, willow, birch and poplar. A revised site plan (Proposed Site Plan 2504-A3 revision A) also shows the location of a wildlife area, and a new pond. In the wider site, the retained habitats (pasture, boundary hedgerows, ditch) will continue to remain connected to the wider habitat network.

	grassland etc. (iv) proposals are in accordance with the standards for habitat mitigation and management as described at section 8.2 and Figure 6 in the TWBMS. (v) Wide swathes of unlit bat habitat with associated buffer zones ensuring landscape permeable to commuting bats. (vi) Retained core bat habitat connects to the wider habitat network.	Whilst there will be an overall loss of pasture, it is appreciated that the layout has been designed to avoid impacting boundary features, and makes use of an existing access point. As per Section 8.2.5 of the TWBMS, it is acknowledged that grazed pasture creation is unlikely to be a practical mitigation option. The wider field will continue to function as pasture (with the proposed barn ultimately helping to maintain this function), therefore, the bat foraging resource will largely be retained. Overall, in this instance, the proposed mitigation (30 trees creating a new/enhanced tree line to the south, as well as a pond) is considered to appropriately address section 8.2 of the TWBMS.
7	<u>Applications on green field sites in Yellow Zone.</u> Lighting Impact Assessment, including lux contour plots, in line with Section 8.3 of TWBMS.	No new lighting is proposed. A condition must be applied to ensure in the instance that lighting is required, it must be designed to avoid excessive light spill on sensitive habitats and be first approved by the council.
8	<u>Reserved Matters and Full applications on green field sites in Yellow Zone</u> CEMP to set out: • Location of temporary work areas. • Schedule of works covering removal, enhancement and creation of habitat features in relation to construction works. • Details of compliance arrangements and how staff will interface with Council TWBMS Project Officer. • Management of habitats during the construction phase.	Section 6.1 of the ecology report sets out provisional construction phase precautions. Further detail will be required within a Construction Method Statement (CMS), to be secured by condition.
9	Application to demonstrate measures to ensure core bat habitat will remain relatively undisturbed by the effects of urbanisation.	The proposed development is for agricultural purposes.
10	<u>Reserved Matters and Full application on green field sites in Yellow Zone,</u> LEMP to set out: • Plan showing extent of habitats which the Management Company will be responsible for • Management objectives for each habitat	A LEMP will be required by condition. It must include full details of proposed habitat creation and management, including the habitats proposed for BNG (trees), as well as further enhancements (wildlife area and pond) shown on the Proposed Site Plan 2504-A3 revision A. The layout shown on said plan must be secured via a compliance

	1 and 5 year schedules of management activities including replacement /restoration works where damage occurs. - Review mechanism	condition. The CMS will ensure habitats are adequately protected during construction. It is understood that the wider site will be maintained as grazed pasture.
12	An appropriate lighting monitoring regime has been provided.	Lighting monitoring will not be required since no new lighting is proposed, and if this plan changes, appropriate lighting will be secured via condition nonetheless.
13	The applicant agrees that a financial Strategic Habitat Mitigation Contribution (yellow medium risk bat sensitivity zone) of £972.03/ dwelling or £29,137.50 per hectare will be secured by S106.	Based on the total area habitats to be lost (reported in the BNG metric and BNG report), the area of greenfield land would equate to 0.146 ha. This measurement aligns with the development area as calculated using the site's red line boundary, excluding the tree planting area. The required contribution will therefore be $0.146 \times £29,137.50 = £4,254.10$.

Other protected and notable wildlife

The ditch along the southern boundary of the field may provide some suitable conditions for amphibians (though it was dry at the time of survey). Nonetheless, the grassland to be impacted by the proposal is intensively grazed and unlikely to provide significant opportunities herpetofauna, nor other taxa such as badgers or nesting birds. Precautions for these species as well as sensitive habitats, such as the ditch and hedgerow, should be included within the aforementioned CMS.

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 (Biodiversity Net Gain Report, Avon Ecology, December 2025; Statutory Biodiversity Metric, Avon Ecology, November 2025) confirming the baseline and predicted post- development biodiversity units of Site has been submitted (including the condition assessment sheet and map).

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	0.61 Habitat units
	0.01 Hedgerow units
	0.00 Watercourse units
Are there any irreplaceable habitats on-site?	No

Has any habitat degradation of occurred?	No
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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.

DRAFT CONDITIONS:

1. Compliance with submitted documents

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

- Ecological Impact Assessment, Avon Ecology, December 2025
- Biodiversity Net Gain Report, Avon Ecology, December 2025
- Proposed Site Plan 2504-A3 revision A, Hodges Associates, July 2025

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

2. 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 sensitive 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 wildlife-sensitive habitats, including habitat used by bats.

3. Construction Method Statement

No development shall commence on site (including any vegetation removal or works to existing structures), until a Construction Method Statement has been submitted to, and approved in writing by the Local Planning Authority. The Construction Method Statement shall include all precautionary measures to be implemented during the construction period, for the protection of sensitive habitats and species known to be present within or adjacent the site, with particular reference to bats, nesting birds, badgers, amphibians and reptiles, as well as the bordering ditch and hedgerow. The development shall be carried out in strict accordance with the approved Construction Method Statement.

REASON: To ensure adequate protection, mitigation and compensation for protected species and priority habitats throughout the construction period.

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

Ecologist Abi Gazzard	Date 26/02/2026
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