

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	26/02/2026
Application number:	PL/2026/00280
Proposal:	Proposed Erection of 2 Semi-Detached Dwellings with associated landscaping
Site address:	15 Castle Street, Trowbridge, BA14 8AS
Case officer:	Verity Giles-Franklin

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, A Harlow & Son, undated
- Existing and Proposed Block Plan, A Harlow & Son, January 2026

The site comprises an area of hardstanding with a former car wash facility, now demolished. It is within an urban area, surrounded by buildings and roads in all directions. It is proposed to erect 2 dwellings. Previously, a scheme for the construction of 6 dwellings was approved.

COMMENTS:

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) 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.

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 £1,850 for the 2 dwellings. 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.

No loss of bat habitat is proposed. The AA concludes no adverse effects on the SAC site, subject to the contribution listed above. This 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.

Protected species

The site is unlikely to support roosting bats as it possesses no buildings, trees, or other potential roosting structures. The site is within an urban centre, surrounding by street lighting, shops and further housing. No loss of green habitat is proposed, and it is unlikely that the works would adversely affect other protected and notable wildlife such as reptiles, amphibians or badgers.

There are records of breeding swifts 40m northeast and 60m northwest. There are also bat records that appear to be associated with the River Biss 240m south, and greenspace (open park) 340m east. In line with the NPPF and with CP50, applications must ensure that gains for biodiversity, relevant to local habitats and wildlife populations, should form part of the proposed development. As such, biodiversity enhancements – such as provisions for bats and swifts, and wildlife-friendly plantings – should be secured via a condition.

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 development meets the following criteria and is therefore below the de minimis threshold, meaning the development:

- o does not impact an onsite priority habitat (a habitat specified in a list published under section 41 of the Natural Environment and Rural Communities Act 2006); and
- o impacts less than 25 square metres of onsite habitat that has biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat (as defined in the statutory metric).

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

Prior to the commencement of any works, including vegetation removal and demolition, details of the number, design and locations of ecological enhancements – such as bird and bat boxes, and wildlife-friendly plantings – shall be submitted to the local authority for approval. The approved details shall be implemented before occupation of the final works.

REASON: To provide mitigation/enhancement for biodiversity.

Informative – Artificial Lighting

The habitat within the wider area is suitable for roosting, 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.

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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