

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	04/03/2026
Application number:	PL/2026/01056
Proposal:	Permission in Principle for the erection of one self-build dwelling
Site address:	Hillview Farm Byre, 2C Bradford Road, Winsley, Bradford on Avon, BA15 2HL
Case officer:	Steven Sims

Recommendations:

☒	HRA required – further information needed
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Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date)
a)	HRA assessment for bat SAC	Habitat Regulations, NPPF, Wiltshire CP50	04/03/2026 -An ecological assessment of the site -A statement of any vegetation proposed for removal -Clarification of whether any lighting is proposed -Proposed mitigation, as relevant	

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:

- Planning Statement, Tadman Planning Consultants Ltd, undated
- Proposed New Dwelling, A Harlow & Son, February 2026

The site comprises an area of land forming part of an existing garden (intersected by a driveway), extending partially into a field to the south. The site is neighboured by further grassland fields to the east, west and south, with a line of trees/woodland strip 15m west and extending southwards. There is a large suburban area approximately 100m to the west, and limestone grassland County Wildlife Site (Winsley Reservoir) 110m east.

This application seeks permission in principle to erect one dwelling.

COMMENTS:

Bath & Bradford on Avon Bats Special Area of Conservation (SAC)

This site is located within multiple Lesser Horseshoe, Greater Horseshoe and Bechstein's Bat roost buffers associated with the Bath and Bradford-on-Avon SAC. The site is linked to grassland and woodland in the wider landscape, potentially providing important foraging and commuting habitats. There are a number of records of large numbers of Lesser Horseshoe bats roosting approximately 690m southeast of the site.

Based on the information provided, the current proposal could result in the loss of potential foraging habitat (grassland; condition and type unknown) as well as disturbance of habitat at the peripheries during construction and post-development via, e.g., new lighting. It is understood that the site is currently unlit. It is not known whether any trees are proposed for removal.

For projects that could impact a European habitats site, a habitats regulations assessment (HRA) must be carried out to determine the potential significant effects and the suitability of any measures proposed to avoid or mitigate those effects.

Paragraph 1A of regulation 70 of the Conservation of Habitats and Species Regulations 2017 states that the assessment provisions apply to "*granting permission in principle under section 59A of the TCPA 1990 (Development orders: permission in principle)*". This makes it clear that the relevant competent authority (the LPA) must make an Appropriate Assessment (AA) of the implications of the proposal before any Permission in Principle is authorised. Further information can be found within the [Government's guidance for applications for permission in principle](#).

Insufficient information has so far been submitted to enable the AA to be undertaken, which must be completed and the conclusion agreed with Natural England prior to the application being determined. The following is required:

- An ecological assessment of the site, providing information on existing habitats and potential impacts on bats
- A clear statement of any vegetation proposed for removal, including clarification of whether any tree removal is proposed
- Clarification of whether any lighting is proposed
- Proposed mitigation (e.g., habitat creation)

The applicant should note that there must also be a suitable mechanism in place through which to secure all necessary mitigation – if required for positive conclusion of AA – at the Permission in Principle stage.

Protected species and habitats

The site and surrounding area may be suitable for use by bats, badgers, nesting birds, amphibians and reptiles, and there are two County Wildlife Sites within 250m (Winsley Reservoir 110m east and Cottles Lane Meadow 235m southwest).

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 networks

Evidence demonstrating no net loss of local biodiversity resource and that the integrity of ecological networks must be submitted and reviewed by the LPA's ecology team at the technical details consent stage. Ecological information submitted at that stage should consider the

presence of protected and Priority species and habitats, and any relevant mitigation as well as enhancements.

Biodiversity Net Gain

The grant of permission in principle is not within the scope of biodiversity net gain (as it is not a grant of planning permission). The subsequent technical details consent will be subject to the biodiversity gain condition. Please note that 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.

If the applicant considers that the development would not be subject to the biodiversity gain condition, Schedule 7A of the Town and Country Planning Act 1990 the applicant must provide a statement as part of the planning application setting out the reasons why they believe this is the case. Submission of a completed metric calculation tool may be necessary to evidence the statement.

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 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.

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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