

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	12/03/2026
Application number:	PL/2026/00390
Proposal:	Re-application for change of use from class C3, 4 bedroom house to class C4, 5bedroom house of multiple occupancy
Site address:	16 Budbury Place, Bradford On Avon, BA15 1QF
Case officer:	Selina Parker-Miles

Recommendations:

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

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, PMJ Planning Services, January 2026
- Existing Elevations, PMJ Planning Services, January 2026
- Proposed Elevations, PMJ Planning Services, January 2026
- Existing Block Plan, PMJ Planning Services, January 2026
- Proposed Block Plan, PMJ Planning Services, January 2026

The site comprises a dwelling proposed for change of use from a 4-bedroom dwelling to a 5-bedroom HMO. Two additional parking spaces are indicated on land that comprises hardstanding at present. This is a reapplication from a previous planning permission that has now lapsed (20/09524/FUL). No physical changes to the property are proposed.

COMMENTS:

Bath and Bradford-on-Avon Bats Special Area for Conservation (SAC)

The site lies within multiple core roost buffers for Greater Horseshoe and Lesser Horseshoe bats associated with the Bath and Bradford-on-Avon Bats SAC, and there are several known roosts within the vicinity. There are records of a small Lesser Horseshoe hibernation roost as well as a Greater Horseshoe roost within 30m of the site, and another Greater Horseshoe roost 75m southwest. The proposal may therefore have the potential to result in significant adverse impact on the special features of that site. Appropriate Assessment (AA) under Section 63 of the Habitats Regulations 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.

A test of likely significance (screening assessment) has been carried out by Wiltshire Council as required under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) (also known as the Habitat Regulations). The proposals do not include any building alterations and would not result in a significant increase in human disturbance in this already-urban area (with a total increase of 1 bedroom). No foraging/commuting habitat is to be removed, and no lighting is proposed. As such, the application is screened out of Appropriate Assessment with respect to the Bath and Bradford-on-Avon Bat SAC. The HRA has concluded that the application is not likely to have significant impacts on the SAC and Appropriate Assessment is not required.

Protected species

An increase in artificial lighting can deter bats and result in the severance of key areas. No lighting is proposed, and the surrounding roads are subject to light spill from existing street lights and security lights. Nonetheless, considering the presence (and conservation significance) of Annex II bat roosts nearby, it is recommended that a lighting condition is applied to ensure that, in the event new lighting is required, it must be designed to be wildlife-sensitive and plans must be first submitted to the LPA for approval.

Given the lack of physical works proposed, the risk posed to other protected species is thought to be minimal.

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

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

Ecologist Abi Gazzard	Date 12/03/2026
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