

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	12/01/2026, 16/03/2026
Application number:	PL/2025/08773
Proposal:	Erection of livestock building, agricultural storage building and associated works – revised scheme to PL/2025/02802
Site address:	LOWER DUNGE FARM, BRATTON ROAD, WEST ASHTON, TROWBRIDGE, BA14 6AX
Case officer:	Steven Vellance

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	Trowbridge & Westbury Bat Mitigation Strategy Habitat Regulations, CP50, NPPF	16/01/2026 -Confirmation of type and locations of external lighting to be installed	YES (16/03/2026) Confirmation of no external lighting: -Planning, Design & Access Statement, Woolley & Wallis, November 2025, version 2 uploaded 11/02/2026
2	BNG	Environment Act 2021	16/01/2026 -Updated metric to include all habitats within redline boundary	YES (16/03/2026) Updated metric, maps and condition assessment sheets: -Statutory Biodiversity Metric, George Clutterbuck, February 2026 -Ecology Technical Note, Ethos Environmental Planning, February 2026

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, Design & Access Statement, Woolley & Wallis, November 2025, [version 2 uploaded 11/02/2026](#)
- Ecology Technical Note, Ethos Environmental Planning, November 2025, [February 2026](#)
- Statutory Biodiversity Metric, Ethos Environmental Planning, October 2025
- [Statutory Biodiversity Metric, George Clutterbuck, February 2026](#)
- Location Plan, Woolley & Wallis, CC/FP/PAG/01

The site comprises an arable field with grassland margins and scrub/trees/hedgerow at the northern and western boundaries. It is proposed to construct two livestock buildings/barns. A previous application determined that prior approval would not be required for the development of two barns elsewhere on Lower Dunge Farm – the current application has re-sited the proposed barns to a different plot of land within the wider farm. Both the previous and current site fall within the Salisbury Plain Special Protection Area (SPA) 6.4km buffer, and the grey and yellow zones of the Trowbridge & Westbury Bat Mitigation Strategy (TWBMS). Recently, planning applications were submitted for the site immediately adjacent to the northern boundary (under the same ownership) (PL/2025/08779 [under consultation] and PL/2025/05985 [approved]).

[Thank you for the submission of updated documents; my second comments are shown in blue.](#)

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 potential impact of recreational pressure on stone curlew, in combination with other plans and projects, must be considered.

A test of likely significance has been carried out by the relevant Competent Authority (Wiltshire Council) as required by Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended). This concluded that given the scale and nature of the development (there will be no additional overnight accommodation created), there is no mechanism for adverse effect. The HRA has concluded that the application is not likely to have significant impacts on Salisbury Plain SPA and subsequently the application is screened out of Appropriate Assessment.

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) 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 therefore 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. However, whilst the site comprises greenfield land (as arable land), it arguably does not constitute bat habitat. Therefore, a financial contribution will not be required in this instance.

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. Insufficient information has so 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. The following issue must be addressed:

- The Ecology Technical Note states “a 15m buffer to the nearest hedgerow” will be maintained, and that “no external lighting is proposed on the buildings”. However, the Planning Statement notes “lighting will be restricted to inside of the buildings and minimal downlighting onto the yard between the two buildings”. Please can the applicant provide the locations and specifications of the proposed external downlighting?

The Planning Statement has now been updated to read “*Lighting will be restricted to inside of the buildings and there will be no external lighting*”.

A test of likely significance has been carried out by the relevant Competent Authority (Wiltshire Council) as required by Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended). This concluded that given the scale and nature of the currently proposed development which (i) involves no overall loss of a roost of a qualifying species, (ii) does not propose removal of any bat habitat, and (iii) does not propose any additional external lighting, there is no mechanism for adverse impact on the Conservation Objectives of the SAC. As such the principles of the TWBMS are not considered further and the application is screened out of Appropriate Assessment with respect to the Bath and Bradford-on-Avon Bat SAC.

Great Crested Newts (GCN)

GCN are a European Protected Species afforded stringent protection under the Conservation of Habitats and Species Regulations 2017 (as amended) and as such are a material consideration within the planning consultation process. Sufficient and appropriate mitigation measures to ensure that GCN are not adversely affected as a result of the proposed development must be submitted as part of the proposal.

The ecology technical note does not acknowledge the presence of a GCN breeding pond in the immediately neighbouring site, nor the potential cumulative impacts of proposed developments (the current application, PL/2025/08779 and PL/2025/05985) all within close proximity to the pond. However, the barns would be constructed >250m from the pond. It is unlikely that the arable habitat >250m from the pond, and away from the site margins, is of significant value to GCN.

Nonetheless, given that the redline boundary includes areas of habitat suitable for use by GCN (e.g., field margins, hedgerows), precautionary mitigation will be required to ensure that the risk to GCN remains minimal. All mitigation should be detailed within a Construction Method Statement, to be secured via a condition.

Other species

The site may contain habitats suitable for use by nesting birds and badgers (with two records of badgers next to the site to the north and east). Precautionary measures to avoid adversely affecting such protected wildlife must be detailed within the required CMS (as mentioned above), to be secured via a condition.

Considering the residual risk posed to light-sensitive species, a lighting condition is recommended to ensure that in the event external lighting is required, it must be wildlife-sensitive and submitted for approval by the LPA.

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, maps and condition assessment (Ecology Technical Note, Ethos Environmental Planning, November 2025; Statutory Biodiversity Metric, Ethos Environmental Planning, October 2025) stating the baseline and predicted post- development biodiversity units of the site has been submitted.

The following issues must be addressed in the baseline prior to determination:

- The Ecology Technical Note states that the field margin (comprising poor condition modified grassland) will be used for BNG habitat creation, and it is included in the habitat maps. However, modified grassland is not included in the statutory metric. The baseline habitats must be confirmed, and metric updated, as appropriate.
- The redline boundary used for the BNG assessment is different from the redline boundary shown on other documents such as the Location Plan. The redline application boundary and site boundary used for the BNG assessment must match. At present, and as per recent aerial imagery, there appears to be further sections of grassland, scrub, hardstanding and hedgerow included within the site boundary, that are not included in the metric (see photo below of northeast section of site):



- Figure 3 (“Proposed habitats onsite”) of the Ecology Technical Note appears to be the same as Figure 2 (“Existing baseline habitats onsite”), and it is not clear where the 69 “small urban trees” will be planted, nor what species these will comprise.

Revised BNG information has been provided (Statutory Biodiversity Metric, George Clutterbuck, February 2026; Ecology Technical Note, Ethos Environmental Planning, February 2026) which addresses the points raised above. The pre-development (baseline) situation is summarised below.

On-site pre-development (baseline) biodiversity value	8.06 Habitat units
	4.61 Hedgerow units
	0.00 Watercourse units
Are there any <u>irreplaceable</u> habitats on-site?	No
Has any habitat <u>degradation</u> of occurred?	No

The proposed BNG includes a pond and tree planting, improving the area for wildlife such as GCN and foraging/commuting bats. Final 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.

CONDITIONS:

1. Compliance with submitted documents

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

- Planning, Design & Access Statement, Woolley & Wallis, November 2025, version 2 uploaded 11/02/2026
- Ecology Technical Note, Ethos Environmental Planning, February 2026

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

2. 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 great crested newts, bats, badgers and nesting birds. 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.

3. Artificial 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 habitat used by bats and other wildlife.

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

Ecologist Abi Gazzard	Date 16/03/2026
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