

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	16/03/2026
Application number:	PL/2026/00896
Proposal:	Listed building consent: Essential roof structure repairs to north west road side paired gabled roofs, including associated repairs to roof covering, dormer window, new roof hatch and repairs to internal finishes
Site address:	The Old Rectory, Church Lane, Wingfield, Trowbridge, BA14 9LW
Case officer:	Fiona Webb

Recommendations:

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

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date)
(a)	Bat mitigation	Habitat Regulations, Wiltshire CP50	16/03/2026 -Clear details of works that will impact the roosts, and mitigation shown on plans -Details of insulation – and any other relevant internal changes – proposed in void roosts	

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:

- Design & Access Statement, CSquared, December 2025
- Ecological Impact Assessment, Tyler Grange, October 2025
- Roof Plan, Mann Williams, April 2025

The site comprises a detached dwelling where structural repairs to the roof are proposed. The site is surrounded by grassland to the northwest and southeast, with residential properties to the northeast and southwest. The works will be limited to the building, with no habitat loss proposed.

COMMENTS:

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

The site is located within two core roost buffers for Greater Horseshoe bats, associated with the Bath and Bradford-on-Avon SAC. The current proposal therefore has potential to result in significant adverse impact on the special features of the Bath and Bradford-on-Avon SAC.

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 will not result in the loss of an Annex II bat roost nor foraging or commuting habitat), there is no mechanism for adverse impact on the Conservation Objectives of the SAC, and the proposal can be screened out of Appropriate Assessment.

Other protected species and habitats

Bats

As above, the proposals are not considered likely to have significant adverse impact on the bat SAC nor Annex II bats associated with the SAC. Nonetheless, consideration must be given to potential impacts upon other bat species, as European Protected Species.

A preliminary bat roost assessment identified a number of potential roosting features, and large amounts of droppings in two loft voids, though the droppings were later confirmed via DNA analysis as belonging to shrews. Accordingly, three emergence surveys were undertaken between July-September 2025. It is noted that there was some minor deviation from the Bat Conservation Trust's Bat Survey Guidelines, with (i) the third survey being undertaken less than 3 weeks after the previous, and (ii) survey 1 beginning less than fifteen minutes before sunset. On the balance of evidence, however, the three surveys are considered adequate in this case – they are not outdated, and it is not likely that further survey work would alter the mitigation requirements.

The building was found to support a common pipistrelle day roost and *Myotis* (peak count 14) maternity roost. The ecology report clarifies that the *Myotis* bats are unlikely to be Bechstein's bats (an Annex II species), given that Bechstein's are not expected to roost in buildings (see evidence detailed in the Bat Conservation Trust's Bat Survey Guidelines).

Under the Conservation of Species and Habitat Regulations 2017, it is an offence to harm or disturb bats or damage or destroy their roosts. Planning permission for development does not provide a defence against prosecution under this legislation. The applicant is advised that a mitigation licence will be required before any work is undertaken to implement this planning permission. The ecology report recommends a number of mitigation measures, including a pre-commencement check by a licenced ecologist, soft demolition, and avoidance of work during the maternity season. **Compliance with these recommendations should be secured via a condition.**

The ecology report states that the majority of roost features will be retained post-development. However, it is unclear what features these are, or whether works are required inside the roof voids that will directly impact the roosting features. A clear description of works impacting the roosts must be provided. This should include confirmation of the insulation materials/scheme, as the ecology report states that the lofts will need to be insulated. Further, mitigation must be clearly outlined and submitted on plans prior to determination. This should include the locations and specifications of the suggested bat access tiles and bat boxes.

Other

The adults, young, eggs and nests of all species of birds are protected by the Wildlife and Countryside Act 1981 (as amended) while they are breeding. Please be advised that works should not take place that will harm nesting birds (such as vegetation clearance or building demolition) from March to August inclusive. The applicant is advised to check any structure or vegetation capable of supporting breeding birds and delay removing or altering such features until after young birds have fledged.

As the proposals only impact the building, the risk posed to other protected wildlife is considered 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.

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.

CONDITIONS: wording to be provided once above issue addressed.

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

Ecologist	Date
------------------	-------------