

For the attention of Sarah Hill

Wiltshire Council
County Hall,
Bythesea Rd,
Trowbridge,
BA14 8JN

12th March 2026

RE: Proposed development at Land fronting Southwest of Witt Road, Winterslow?

Dear Sarah,

I am writing on behalf of the applicant in response to the ecological comments provided by Wiltshire Council in relation to the proposed development of two dwellings at Land fronting Southwest of Witt Road in Middle Winterslow (planning application PL/2025/10022). Within this response the following comments were made in relation to the need for appropriate assessment for impacts to Mottisfont Special Area of Conservation (SAC):

'The site lies within the 7.5km Mottisfont Bat SAC buffer and therefore may have potential to result in significant adverse impact on the special features of that site. 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 plot of land adjoining the northern boundary has recently been developed into three dwellings (PL/2022/07116 (outline) and PL/2023/10274 (REM)); it appears that this plot might fall under the same ownership/applicant. At the outline stage, the Ecology Officer requested a bat mitigation strategy, because barbastelle bats had been recorded on-site. It is therefore likely that barbastelles also are/had been present in the current site. Barbastelle bats are the only qualifying feature for this SAC.

For the adjoining site, the Ecology Officer had recommended that a continuous 'dark bat corridor' (e.g. tree and shrub line) along the southern and western boundaries would be appropriate, but, as per recent aerial imagery, there has been an overall loss of bat habitat in the adjoining plot (loss of boundary hedgerow, grassland, scrub etc.). It is not clear whether the bat mitigation strategy was provided, as there is no copy of it available in the files for the outline and REM applications. Further, the ecology report for the current site does not make

any reference to this strategy, the Mottisfont SAC, nor potential impacts of the works on barbastelle or the SAC. No bat activity surveys have been undertaken for the current application. **Further information is required to determine the impacts of the proposal on this species including, but not exclusively, a mitigation strategy.** 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.'

We understand the Council's concern regarding the site's location within 7.5 kilometres of the Mottisfont Bat SAC and the need to consider potential impacts to qualifying bat species, including barbastelle (*Barbastella barbastellus*). However, we believe that there is no likely impact on suitable foraging or commuting routes likely to contribute to an impact (accumulative or independent) from the development of this site.

The records of barbastelle from the adjacent development constitute two records obtained during an updated emergence survey in 2022. These records are both brief commuting passes recorded at 04:03 on the 20th May 2022 and at 22:47 on the 27th June 2022 (LCECO, 2022). No record of this species was recorded in the initial emergence surveys of this site in 2018 (LCECO, 2018). The passes recorded in 2022 represent behaviour consistent with commuting passes by lone individual bats. As neither record was visually recorded there is no evidence that this species was using habitats that were present on site. Similarly, the lack of foraging indicates there is no link to the core substance zone for breeding site. This is not inconsistent with the value of the habitat that was present in 2022 and 2018. These habitats functionally comprised garden with ornamental hedging. This does not represent high quality foraging or commuting habitat for barbastelle bat. Activity levels recorded were low in general and the buildings on site held a non-breeding day roost used by low numbers of brown long-eared bats (one bat recorded in 2018). The current survey guidelines defines low potential flight paths and foraging habitats as '*habitat that could be used by small numbers of bats as flight paths such as gappy hedgerows but isolated and not very well connected to the surrounding landscape by other habitat*' or '*suitable but isolated habitat that could be used by small numbers of foraging bats.*' (Paraphrased Table 4.1 Collins et al 2023). Given the limited activity present and the poor quality of foraging habitats; we would argue that this definition is reasonable to apply to the application area and it is unlikely to form part any core sustenance zone for the SAC.

I appreciate the ecology officer has made recommendations in relation to adjacent development. However, I cannot locate these comments on the planning portal and the condition of planning (condition 10, PL/2022/07116) requires only compliance to the recommendations within the approved EclA report (LCECO, 2022). The relevant section of this report as outlined within the decision notice states:

'During the operations phase it is unlikely that the new residence would generate a significant change in additional lighting over the baseline conditions from light spill alone.

However, there is the risk that external strong direction lighting (such as security lighting) would cause disruption to bats in the wider offsite habitats if it was positioned to the northern and north west of the site. The IEF is of local value, the magnitude of impact is considered to be low and therefore the impact significance is not significant.'

The site is a former donkey paddock which has been significantly degraded by the removal of vegetation to facilitate a works yard for the adjacent development. The application site itself is small with approximately half of the grassland currently stripped to bare ground and used for the storage of vehicles and materials associated with the adjacent development. This further reduces the ecological value of the habitats which are unlikely to support significant invertebrate assemblages, even when compared to the habitats immediately adjacent to the site on the western side.

The site is bordered by hedgerows on the north and west boundaries. However, the western hedgerow has only recently been planted and is unlikely to provide significant value as a commuting route. The hedgerow is a hawthorn (*Crataegus monogyna*) monoculture that was planted after the 2018 emergence survey. Newly planted hedgerows are of limited structural and botanical diversity and typically provide lower ecological value and reduced invertebrate abundance; consequently, this may limit the hedgerow's suitability for supporting commuting and foraging bats.

There is currently no linear route of connectivity linking the site to wider suitable habitats. The closest suitable habitat is a woodland block located approximately 50 metres to the southwest of the site. At present, there are no established commuting routes connecting this woodland to the development site. While the proposed hedgerow planting may, once established, provide a degree of linear connectivity within the local landscape, the woodland remains well outside any buffer zone required for light spill effects. As such, even with the future establishment of the hedgerow, the woodland habitat would not be affected by light levels associated with the development. It is therefore unlikely that there is an attractant draw to the poor quality habitats on site compared to habitats within either the local or wider area. It should be noted that larger woodland blocks in the wider landscape are suited to barbastelles and these are located approximately 0.5 kilometres from the site at their closest point. As such, facilitating a commuting corridor for barbastelle within the confines of the site design is unreasonable given the low likelihood of use. Appendix I below shows the site in relation to nearby woodland blocks.

I appreciate that the standing guidance for barbastelle indicates that the core sustenance zone may extend for up to six kilometres from known breeding sites. However, there is no indication that habitats present within the small development area would be suitable for the foraging of this species, or indeed attractant, when compared to the surrounding area. In addition to this, there is no indication that there is an overlapping territory based on the previous survey data. To summarise, there is limited foraging potential provided on site, there is no connectivity to the wider landscape, the hedgerows are detached and largely

isolated from other linear features, there is a greater abundance of suitable habitat in the wider landscape and there is no indication or evidence of foraging or habitual use of the site within previous survey data.

Notwithstanding the above, the applicant is committed to ensuring that retained or replaced boundary vegetation is protected from potential lighting impacts associated with the proposed development. Due to the limited size of the site, it is not feasible to achieve the full 10 metre buffer recommended in current best practice guidance (Bat Conservation Trust, 2023) between the proposed dwellings and the retained hedgerow. However, a reduced buffer will be retained, and lighting will be designed to minimise spill onto this feature through the use of directional, low-level luminaires and careful positioning. While the 10 metre buffer is recommended for confirmed bat commuting routes used by light-sensitive species such as barbastelle, there is no evidence that the hedgerow currently functions as a key commuting corridor. Nevertheless, the proposed lighting design will seek to maintain low light levels along the boundaries to ensure it remains suitable for use by bats. We would propose that a sensitive lighting strategy is implemented to ensure that the retained hedgerow remains functionally dark to ambient light levels, with no direct lighting from the adjacent development. A baseline habitat map showing the position of the hedgerow (H1) is provided below in appendix II, and the development plan showing the position of the dwelling in relation to the western boundary is provided as figure 3 in appendix II.

We trust that the above information clarifies the ecological context of the site and demonstrates that the hedgerow is unlikely to represent a key feature for barbastelle bats. However, we remain willing to discuss appropriate mitigation measures with the Council to ensure the development proceeds in a manner consistent with the conservation objectives of the SAC. We feel that a dedicated habitat's regulation assessment for the Mottisfont Bat SAC is unlikely to be necessary given the very low likelihood of impact.

Please do not hesitate to contact us should you require any further information.

Kind regards,
James Genge BSc (Hons)
Ecologist

Appendix 1: Site location plan



L C Ecological Services Ltd Company registration: 4536801 VAT number: 887458947

Appendix II: Location of existing hedgerows



Figure 2: Baseline habitat map showing position of hedgerow H1.

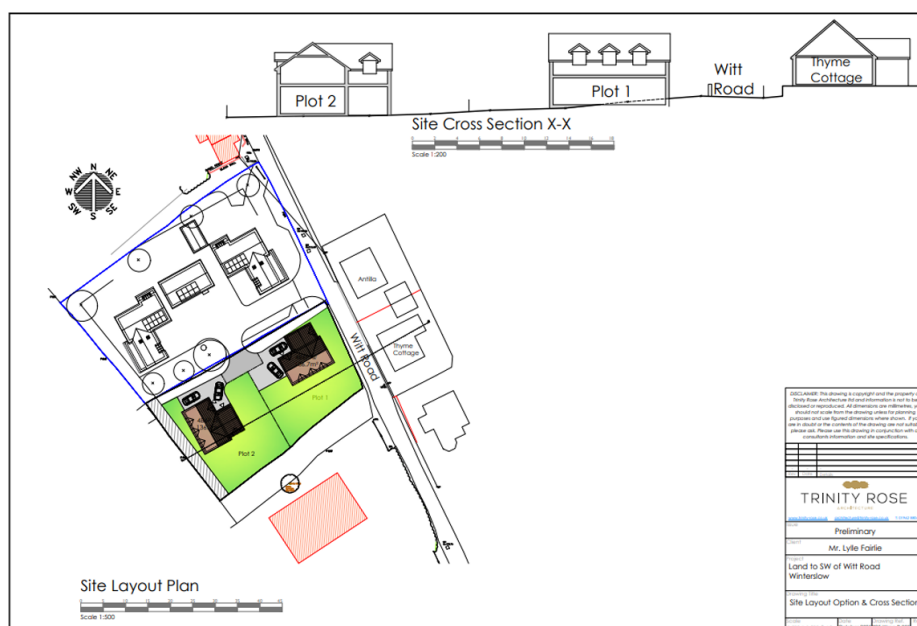


Figure 3: Proposed development plan showing position of dwelling in relation to western boundary.



Image 1: Facing west towards retained hedgerow.



Image 2: Facing west towards retained hedgerow