

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jessica Cracknell
Date:	19/01/2026 20/03/2026 23/03/2026 updated comments
Application Number:	PL/2025/08886
Proposal:	Creation of a 3G Artificial Grass Pitch (AGP) with perimeter fencing, hardstanding areas, storage container, floodlights, an access footpath and associated bund
Site Address:	Recreation Ground, Leafy Lane, Corsham, SN13 0JT
Case Officer:	Isobella Wise

Recommendations:

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

An Appropriate Assessment for impacts on the Bath and Bradford-on-Avon Bats SAC has been completed and sent to Natural England for their agreement that the HRA can be favourably concluded. There is a statutory 21-day response window. The application must not be approved until NE have endorsed the conclusion of the AA and the information requested above is provided.

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date submitted)
1	Bath and Bradford Bats SAC	Habs Regs, WCA, NPPF, CP50	19/01/2026 Evidence demonstrating functionality of the site for bats will be maintained. A plan with dark corridors along key bat habitat/ corridors clearly identified and buffered, in line with Bats SAC guidance. Evidence of Alignment with Corsham Batscape Strategy	YES 20/03/2026 - Seasonal Overview – Phase II Bat surveys. 20 February 2026. BJ Collins Protected Species Surveyors Limited; - Inspection for Roosting Bats at Leafy Lane Playing Fields, Corsham. 07 November 2025. BJ Collins Protected Species Surveyors. Ref. GLE_2513; - Spillage Comparison. 04 November 2025. Surfacing Standards Limited. Project No. G-231622. Drawing No. 07. Rev. 00; - Floodlighting Scheme. 04 November 2025. Surfacing Standards Limited. Project

				No. G-231622. Drawing No. 06. Rev. 00.
2	Biodiversity Net Gain (BNG)	Town and Country Planning Act 1990	19/01/2026 20/03/2026 Submission of statutory metric calculation with the correct baseline habitats, condition assessments and associated baseline habitat plans.	YES 23/03/2026 • The Statutory Biodiversity Metric. 27 February 2026. V4; • BNG Cover Report V4. 27 February 2026. BJ Collins Protected Species Surveyors Limited; • UKHab Habitat Map – BNG Baseline V4. 27 February 2026. BJ Collins Protected Species Surveyors Limited; • UKHab Habitat Map – BNG Proposed V4. 27 February 2026. BJ Collins Protected Species Surveyors Limited.

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 your consultation on the above application. I have reviewed the submitted documents against OS maps, aerial photographs of the site and surrounding area, together with GIS layers of statutory and non-statutory designated sites and existing records of protected species.

The following submitted documentation was reviewed to inform this response:

- Phase II Bat Surveys. 24 October 2025. BJ Collins;
- Preliminary Ecological Appraisal (Extended) Report. 17 October 2025. BJ Collins.
- Seasonal Overview – Phase II Bat surveys. 20 February 2026. BJ Collins Protected Species Surveyors Limited;
- Inspection for Roosting Bats at Leafy Lane Playing Fields, Corsham. 07 November 2025. BJ Collins Protected Species Surveyors. Ref. GLE_2513;
- The Statutory Biodiversity Metric. 27 February 2026. V4;
- BNG Cover Report V4. 27 February 2026. BJ Collins Protected Species Surveyors Limited;
- UKHab Habitat Map – BNG Baseline V4. 27 February 2026. BJ Collins Protected Species Surveyors Limited;
- UKHab Habitat Map – BNG Proposed V4. 27 February 2026. BJ Collins Protected Species Surveyors Limited;
- BNG Areas. 05 November 2025. Surfacing Standards Limited. Project No. G-231622. Drawing No. 11. Rev. 00;
- Arboricultural Impact Assessment. 20 November 2025. RPS Group Plc. 5413-RPS-XX-XX-RP-AR-9104. Version. P01;
- Playing Field Layout. 04 July 2025. Surfacing Standards Limited. Project No. G-231622. Drawing No. 10. Rev. 00;
- Proposed Site Plan. 04 November 2025. Surfacing Standards Limited. Project No. G-231622. Drawing No. 03. Rev. 00;
- Proposed Lighting Scheme. 13 June 2025. Surfacing Standards LTD. Project Code. G-231622;
- Sports Lighting Statement. 31 October 2025. Surfacing Standards Limited. SSL Project Code. G-231622;
- Floodlighting Scheme. 04 November 2025. Surfacing Standards Limited. Project No. G-231622. Drawing No. 06. Rev. 00;
- Spillage Comparison. 04 November 2025. Design and Access with Planning Statement. 31 October 2025. Surfacing Standards Limited. SSSI Project Code. G-231622;
- The Reduction of Obtrusive Light. 2021. Institution of Lighting Professionals. Guidance Note 01/21;

- Proposed Elevation. 04 November 2025. Surfacing Standards Limited. Project No. G-231622. Drawing No. 05. Rev. 00;
- Proposed AGP Plan. 04 November 2025. Project No. G-231622. Drawing No. 04. Rev. 00;
- Noise Management Plan. Surfacing Standards Limited. SSSI Project Code. G-231622;
- Topographical Survey. 04 November 2025. Surfacing Standards Limited. Project No. G-231622. Drawing No. 01. Rev. 00;

Bath and Bradford on Avon Bat Special Area of Conservation (SAC): Habitat Regulations Assessment (HRA)

The application site is located within a consultation zone for Bechstein's bats, Greater Horseshoe bats and Lesser Horseshoe bats associated with the Bath and Bradford on Avon Bats Special Area of Conservation (SAC) and therefore has 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 site is assessed to offering significant suitability for foraging and commuting bats in the form of boundary hedgerows, scrub, scattered trees and woodland. The majority of activity recorded was from common and soprano pipistrelle, with records of noctule, brown long-eared, barbastelle, greater horseshoe, lesser horseshoe and Myotis species. The species assemblage indicates that the site is of importance for bats, with activity predominantly associated with boundary features. The proposed development must ensure that key habitat features are retained and that any loss is mitigated through habitat creation and management, with measures to maintain ecological connectivity for bats. Retained hedgerows across the site must be buffered and enhanced where possible to reduce fragmentation and support bat movement.

A lighting plan has been submitted in support of this application, Floodlighting Scheme (04 November 2025. Surfacing Standards Limited. Project No. G-231622. Drawing No. 06. Rev. 00); and Sports Lighting Statement (31 October 2025. Surfacing Standards Limited. SSL Project Code. G-231622); which identifies potential light spill calculations from the proposed development. The report confirms that flight lines along the northern boundary of the site will remain dark for foraging and commuting bats. It is acknowledged that the updated lighting proposals represent a significant improvement over the existing lighting scheme, as demonstrated in the Spillage Comparison Plan Plan (04 November 2025. Design and Access with Planning Statement. 31 October 2025. Surfacing Standards Limited. SSSI Project Code. G-231622). The revised floodlighting scheme has the potential to remove direct light spill onto the tree canopy along Boxfields Road, creating an approximate 5 metre buffer between the canopy and the 0.2 lux contour.

The lighting layout also includes refinements to luminaire focusing and direction, designed to limit light spill and maintain dark buffer zones along the woodland/hedgerow boundaries. It is noted that the Spillage Comparison (04 November 2025. Surfacing Standards Limited. Project No. G-231622. Drawing No. 07. Rev. 00) demonstrates a reduction in lux levels to the existing scheme.

The proposed lighting is dimmable, and it is expected that reduced lighting options will be used when the pitch is being used for training purposes. Conditions will be required to secure the proposed lighting scheme, and these should restrict the use of lighting (for example, when the pitch is not in use) and the erection of additional lighting. Should there be any changes to the proposed lighting scheme the council's ecology team must be reconsulted.

~~However, according to the Floodlighting Scheme Plan, light levels exceed 0.5 lux on the eastern hedgerow boundary. Whilst the hedgerows are retained, dark buffers are not specified (m) on the plans or reports therefore the application does not demonstrate that they will be adequately buffered from the development to ensure functionality will be maintained. To ensure ecological functionality for foraging and commuting bats is retained it is expected that an undeveloped continuous dark corridor is provided along key bat habitat. The new lighting scheme must be in line with the bats SAC guidance.~~

Corsham Batscape Strategy states that...*Although the habitat along the direct migration route shown on the phase 2 maps may appear poor, bats are still likely to be using the most direct route between key sites. As such, there needs to be an emphasis on avoiding lighting impacts and a reduction in habitat connectivity and*

also enhancing restoring habitat connecting along the direct migration routes wherever possible. The application site is partially within the Braydon Forest Direct Mitigation Route, with Annex II species recorded utilising the boundary features. The strategy states that development can proceed in these areas where adequate mitigation can be put in place to ensure the retention of the functionality of the habitat.

~~The Corsham Batscape Strategy advises that bat habitat features should be buffered considerably from development to secure appropriate light levels, with reference to the Bat SAC Planning Guidance for Wiltshire (September 2015), which recommends a minimum buffer distance of 15 metres.~~

~~The applicant should ensure that at this site aligns with the Corsham Batscape Strategy, further information can be found here: [sppnp-corsham-batscape-strategy-reduced.pdf](#).~~

~~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.~~

There is an expectation that all lighting provided on site would be in accordance the appropriate Environmental Zone standards set out by the Institute of Lighting Engineers in their publication GN01:2021, ‘Guidance for the Reduction of Obtrusive Light’ (ILP, 2021), and Guidance note GN08/23 “Bats and artificial lighting at night”, issued by the Bat Conservation Trust and Institution of Lighting Professionals and would demonstrate that bat habitat (trees and woodland) on the perimeter of the site will remain below 0.5 lux (or no higher than existing). *Although minor light spill remains in limited areas to the east of the site, this is now significantly reduced and is considered to represent a substantial improvement over the original scheme.*

The floodlights are proposed to be used between the hours of 09:00 and 22:00 hours, only at times of the year when daylight is fading or it has gone dark. A condition will be required to secure these operating hours.

As required by the Conservation of Habitats and Species Regulations 2017 (as amended) an Appropriate Assessment has been completed by the LPA with a favourable conclusion. The AA has been sent to Natural England (20/03/2026) and the application must not be determined until they have agreed with the LPAs conclusion.

Biodiversity Net Gain (BNG)

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 (06 November 2025. V3) confirming the baseline and predicted post-development biodiversity units of the site has been submitted (including the condition assessment sheets and baseline habitat maps).

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

- ~~The UKHab Habitat Map – BNG Baseline V1 (24 October 2025. BJ Collins) records ‘Developed land; sealed surface’ within the baseline habitats. However, the Statutory Biodiversity Metric (06 November 2025. V3) does not identify ‘Developed land; sealed surface’ within the baseline. To ensure accuracy and compliance, the baseline habitat types recorded within the statutory biodiversity metric and the accompanying habitat maps must align and, where necessary, amended to reflect the habitats actually present on site.~~

Information in the completed on-site baseline habitat tabs is accepted as accurate based on the information submitted. The pre-development (baseline) situation is summarised below.

On-site pre-development (baseline) biodiversity value	1.34 Habitat units
	0.00 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

Note to case officer: The Statutory Biodiversity Metric calculation (27 February 2026. V4) does not provide information on how the development will achieve 10% BNG. 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.

Core Policy 50

Core Policy 50 of the Wiltshire Core Strategy requires all development to demonstrate no net loss of biodiversity and for major applications the expectation is that development will deliver biodiversity gains. The NPPF also encourages applications to deliver measurable net gains (para 180 d).

CP50 and NPPF requires the inclusion of biodiversity enhancements, such as bird and bat boxes. Further details should be provided on the number and types of bird and bat boxes to be included, and the location of these enhancements must be included in the site plan drawings and will become an enforceable part of the planning permission. Bird/bat boxes will continue to be available for bats/birds for the lifetime of the development. Please see condition below.

~~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 habitats or 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: these will be finalised once the issues above have been addressed

1. Compliance with submitted documents

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

- Inspection for Roosting Bats at Leafy Lane Playing Fields, Corsham. 07 November 2025. BJ Collins Protected Species Surveyors. Ref. GLE_2513;
- Section 5 of the Preliminary Ecological Appraisal (Extended) Report. 17 October 2025. BJ Collins.
- The Statutory Biodiversity Metric. 27 February 2026. V4;
- BNG Cover Report V4. 27 February 2026. BJ Collins Protected Species Surveyors Limited;
- UKHab Habitat Map – BNG Baseline V4. 27 February 2026. BJ Collins Protected Species Surveyors Limited;
- UKHab Habitat Map – BNG Proposed V4. 27 February 2026. BJ Collins Protected Species Surveyors Limited;
- BNG Areas. 05 November 2025. Surfacing Standards Limited. Project No. G-231622. Drawing No. 11. Rev. 00;
- Sections 7 and 8 and Appendices C, D and E of the Arboricultural Impact Assessment. 20 November 2025. RPS Group Plc. 5413-RPS-XX-XX-RP-AR-9104. Version. P01;
- Proposed Site Plan. 04 November 2025. Surfacing Standards Limited. Project No. G-231622. Drawing No. 03. Rev. 00;
- Proposed Lighting Scheme. 13 June 2025. Surfacing Standards LTD. Project Code. G-231622;
- Sports Lighting Statement. 31 October 2025. Surfacing Standards Limited. SSL Project Code. G-231622;
- Floodlighting Scheme. 04 November 2025. Surfacing Standards Limited. Project No. G-231622. Drawing No. 06. Rev. 00;
- Spillage Comparison. 04 November 2025. Design and Access with Planning Statement. 31 October 2025. Surfacing Standards Limited. SSSI Project Code. G-231622;
- Proposed AGP Plan. 04 November 2025. Project No. G-231622. Drawing No. 04. Rev. 00.

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

2. Lighting

Lighting will be installed in strict accordance with the submitted documents and maintained in accordance with the scheme for the lifetime of the development. No additional 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.

Note to case officer: please also include a condition to secure adherence to the Sports Lighting Statement, specifically Page 3 which includes the use of time clocks, lighting curfews, and the use of dimmable control during training purposes.

3. Ecological Enhancements

Prior to the commencement of any works, including vegetation removal and demolition, details of the number, design and locations of ecological enhancement features including bat and bird boxes shall be submitted to the Local Authority for approval. The approved details shall be implemented for the lifetime of the development and before completion of the final works.

REASON: To provide mitigation /enhancement for biodiversity.

INFORMATIVES:

Bat Species

There is a low risk that bats may occur at the development site. Many species of bat depend on buildings for roosting, with each having its own preferred type of roost. Most species roost in crevices such as under ridge tiles, behind roofing felt or in cavity walls and are therefore not often seen in the roof space. Bat roosts are protected all times by the Conservation of Habitats and Species 2017 (as amended) even when bats are temporarily absent because, being creatures of habit, they usually return to the same roost site every year. Planning permission for development does not provide a defence against prosecution under this legislation or substitute for the need to obtain a bat licence if an offence is likely. If bats or evidence of bats is found during the works, the applicant is advised to stop work and follow advice from an independent ecologist or the applicant is advised to follow the advice of a professional ecologist or to contact Natural England's Batline through the internet.

Final sign off – all matters addressed:

Ecologist	Date
Jessica Cracknell	23/03/2026