

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	18/02/2026, 23/03/2026
Application number:	PL/2026/00222
Proposal:	Proposed New Dwelling & Associated Landscaping
Site address:	115 Station Road, Westbury, BA13 4HN
Case officer:	Andrew Thomas

Recommendations:

☐	No Comment
☐	Support
☐	No objection
☒	Condition (no objection subject to conditions)
☐	Objection - further information required
☐	Objection in principle
☒	HRA completed . Appropriate Assessment with a positive conclusion has been sent to Natural England must agree the conclusion (within 21 days) prior to the application being permitted.

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date)
1.	Bats and protected sites (Bath and Bradford on Avon Bat SAC)	Habitat Regulations, CP50, NPPF	18/02/2026 -Mitigation and enhancements for bats shown on plans -Confirmation of whether new lighting is proposed, and, if so, a lighting plan	YES (23/03/2026) -No new lighting confirmed -More than 20m new hedgerow added to plans
2.	County Wildlife Site	CP50, NPPF	18/02/2026 -Details of precautionary working measures and appropriate mitigation	YES (23/03/2026) -Precautionary measures outlined in ecology report; CMS required via condition

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:

- Existing and proposed site plan, drawing AH2025/80, A Harlow & Son, February 2026
- Existing and proposed site plan SUPERSEDED, drawing AH2025/80, A Harlow & Son, November 2025
- Design & Access Statement, A Harlow & Son, undated

- Ecology & BNG Assessment, ABR Ecology, January 2026
- Statutory Biodiversity Metric, Emily Parsons, January 2025
- Ecology & BNG Assessment, ABR Ecology, February 2026
- Statutory Biodiversity Metric, Emily Parsons, February 2025
- Existing and proposed site plan, drawing AH2025/80 sheet 1 of 2, A Harlow & Son, February 2026
- Proposed elevations and floor plans, drawing AH202/80 sheet 2 of 2, A Harlow & Son, February 2026

The site comprises a plot of land to the rear of an existing semi-detached dwelling. It is proposed to construct a new dwelling and associated access and parking, which will involve the removal of a shed and garage. The site is surrounded by a lake 14m to the north and west, residential properties to the south, and a pub to the northeast. There is a railway corridor 30m south.

Thank you for re-consulting Ecology following the submission of updated plans/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 in light of the HRA for the Wiltshire Core Strategy and the HRA for the Wiltshire Housing Site Allocations Plan it is screened into Appropriate Assessment due to the potential impact of recreational pressure on stone curlew in combination with other plans and projects.

A strategic Appropriate Assessment (AA) has been prepared pertaining to development within the 6.4km zone of influence that could result in a likely significant effect on the SPA as a result of an increase in recreational / visitor pressure. The AA reached a conclusion of no adverse effects on the integrity of the SPA or its qualifying features provided that the council's mitigation strategy continues to be implemented. Annual stone curlew monitoring and protection measures continue to be secured by the Council.

In January 2026 Natural England (NE) confirmed that the 2026 strategic AA for Salisbury Plain SPA continues to be supported by NE.

Bath and Bradford on Avon Bat Special Area of Conservation (SAC)

The application site is located within the grey zone of the Trowbridge & Westbury Bat Mitigation Strategy (TWBMS) and a Greater Horseshoe core roost buffer associated with the Bath & Bradford on Avon Bats Special Area of Conservation (SAC), and therefore has potential to result in significant adverse impact on the special features of the SAC. 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.

Recreational pressure

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. In order to conclude the AA favourably, new residential development proposals for 49 dwellings or less within the grey hatched medium risk zone will be expected to provide a financial contribution of £925 per dwelling towards the Council's strategic recreational pressure mitigation scheme.

For this development, the cost of mitigation via the Council's strategic scheme would be £925 for the 1 dwelling. The mitigation is required prior to the commencement of development and must

be secured by planning obligations. Where a Section 106 agreement is not in place, mitigation can alternatively be secured under Section 111. Where the applicant elects to use a S111, the strategic mitigation must be secured upon the granting of planning permission by completion of S111 process.

Potential impacts on bat habitat

The two small buildings to be removed (shed and garage) were assessed as being of negligible potential for roosting bats. The site contains small areas of modified grassland (managed as garden lawn) and bramble scrub (habitats totalling <0.02ha) and hedgerow (<0.03km). The hedgerow will be retained, but grassland and scrub will be removed. Insufficient habitats will be created/enhanced to achieve no net loss onsite, and the plans show that almost the entire plot will be converted into artificial surfaces.

The site is well-connected to valuable habitats such as the lake to the north and west (a County Wildlife Site), which is bordered by a large parcel of woodland, as well as the railway corridor, also bordered by woodland, to the southeast. A Lesser Horseshoe roost has been recorded ~770m north. Overall, it is likely that Annex II species are using habitats surrounding the site, and potentially also making use of the site's connecting habitats between, e.g., the lake and railway corridor.

It is therefore requested that the applicant demonstrates that sufficient mitigation and enhancement for bats can be delivered on-site. For example, new native-species hedgerow planting could be incorporated at the site boundaries, and the area of green space in the northern half of the plot (currently shown as entirely hardstanding) could be increased. The inclusion of bat roosting features, to be shown on plans, would also be welcomed.

Artificial lighting introduced post-development (and during) may cause disturbance to bat flight paths and foraging activity. The applicant must confirm whether any new lighting is proposed. If new external lighting is proposed, then a lighting plan will be required to demonstrate:

- Location, type, number, and specification of all external light sources
- Demonstration that the surrounding habitats will remain unlit (≤ 0.5 lux)

The approach to lighting for new development, including lighting survey, should be undertaken in accordance with Guidance Note 08/23 Bats and Artificial Lighting at Night (Bat Conservation Trust and Institution of Lighting Professionals, 2023).

Insufficient information has thus 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.

A section has been added to the ecology report to detail the provision of new native-species hedgerows. This aligns with newly submitted plans which show the addition of hedgerow planting not just along the northern boundary (as previous) but now also along part of the western boundary, and southern boundary. The southern hedgerow alone will total ~20m of new planting, with the proposed northern hedgerow length matching, if not exceeding, this. I am satisfied that the hedgerow can be secured with the plans (as shown on drawing AH2025/80) and provide adequate habitat creation to offset the loss of a small area of lawn and scrub, whilst helping to maintain green habitat links.

Other general enhancements, such as two invertebrate bricks, are denoted on the plans. It is also understood that no external lighting is proposed – as confirmed by the agent – and that the site is likely already subject to some degree of light spill from streetlights adjacent to the site entrance. Overall, considering the scale of habitat to be lost (primarily mown lawn and scrub), the proposed mitigation is considered appropriate. **Conditions are required to secure (i) compliance with the hedgerow layout/plans, ecology report and biodiversity enhancements, and (ii) no lighting (unless approved by the LPA).** A Construction Method Statement (CMS) is also recommended (below) to ensure the adjacent habitats are protected during construction; the CMS should include precautionary measures to reduce any construction-related risks posed to bats.

The Appropriate Assessment included in these comments concludes that there is not likely to be any significant adverse impact on the SAC site, subject to suitable mitigation (including the financial contribution towards recreational pressure mitigation) measures being secured and implemented. The AA has been sent to Natural England (23/03/2026) and the application must not be determined until they have agreed with the LPA's conclusion.

County Wildlife Site

Westbury Lakes County Wildlife Site (CWS) lies ~14m from the application site boundary. A significant area of the site's habitats will be lost to the proposed building and driveway, with the area of the site closest to the CWS to comprise access and a parking area, and the house being further surrounded by proposed hardstanding/patio. Mitigation for, e.g., runoff into the CWS, light spill and other forms of pollution, has not been considered.

Wiltshire Core Policy 50 requires that CWSs are protected from the effects of development and should be enhanced where possible. It states: "*Sustainable development will avoid direct and indirect impacts upon local sites through sensitive site location and layout, and by maintaining sufficient buffers and ecological connectivity with the wider environment.*" In line with the NPPF and with CP50, applications must also ensure that no net loss of functional habitat for the benefit of wildlife in the local area will occur as a result of the proposed development. Additionally, gains for biodiversity, relevant to local habitats and wildlife populations, should form part of the proposed development.

Details of precautionary working measures and mitigation are required to support this application. Appropriate mitigation and enhancement could include a vegetation buffer between the site and the CWS.

The revised ecology report includes a section concerning the CWS (paragraphs 5.16-5.18). It is stated that a Construction Environmental Management Plan should be prepared, and outlines some provisions for controlling noise/vibration, run-off, lighting and other pollution risks. **A full and separate Construction Method Statement (CMS) should be secured via condition, including protective measures for the CWS and associated wildlife.**

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, condition assessments and maps ('*Ecology & BNG Assessment, ABR Ecology, January 2026*'; '*Statutory Biodiversity Metric, Amy Parsons, January 2025*') stating the baseline and predicted post-development biodiversity units of the site have

been submitted. Since the metric was submitted, the site layout has changed slightly. However, this is understood not to have impacted the BNG calculations, as the metric already includes 100% loss of grassland and scrub.

The pre-development (baseline) situation is summarised below.

On-site pre-development (baseline) biodiversity value	0.14 Habitat units
	0.03 Hedgerow units
	0.00 Watercourse units
Are there any irreplaceable habitats on-site?	No
Has any habitat degradation occurred?	No

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.

The submitted metric indicates 0.25 biodiversity units or less will be required to meet the 10% BNG requirement and that on-site BNG is not achievable. In these circumstances, statutory credits can be bought without providing evidence that insufficient off-site options are available in England. For further information, please refer to guidance on Statutory Biodiversity Credits on the GOV.UK website (<https://www.gov.uk/guidance/statutory-biodiversity-credits>) under 'How to prove statutory credits are needed'.

However, as above, it is advised that the plans are revised to demonstrate greater gains on-site, to enable favourable conclusion of the AA.

A second BNG metric has been submitted. However, the units calculated for the baseline and proposed habitats remain the same, despite the now-proposed hedgerow along the south and west boundaries. This is because these sections of the site must be calculated as "vegetated garden" as they will be contained within a private garden. In any case, the proposed hedgerow must be secured with drawing AH2025/80. The proposed enhancement features of a bat tube, bird box and bee bricks, as well as gravel boards with mammal gaps, are also very much welcomed, though they do not contribute to the BNG calculations. Therefore, as above, and as per the ecology/BNG report, the applicant will need to achieve BNG off-site. Confirmation of how the development will achieve BNG is a post-determination matter.

CONDITIONS:

1. Compliance with submitted documents

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

- Ecology & BNG Assessment, ABR Ecology, February 2026
- Planting and wildlife features shown on 'Existing and proposed site plan, drawing AH2025/80 sheet 1 of 2, A Harlow & Son, February 2026'
- Bat box, bird box and bee bricks shown on 'Proposed elevations and floor plans, drawing AH202/80 sheet 2 of 2, A Harlow & Son, February 2026'

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

2. 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 sensitive 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.

3. 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 bats and nesting birds, as well as Westbury Lakes to the northwest. 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.

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

Ecologist Abi Gazzard	Date 23/03/2026
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