

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	01/04/2026
Application number:	PL/2026/00313
Proposal:	Listed building consent: Essential repairs to Moat Bridge
Site address:	Devizes Castle, Castle Grounds, Devizes, SN10 1HL
Case officer:	Helen Garside

Recommendations:

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

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 and Access Statement, Scott & Twine, January 2026
- Ecological Impact Assessment, LC Ecological Services, February 2025

The site comprises a moat bridge within the grounds of Devizes Castle scheduled monument (currently comprising two residential properties). It is proposed to carry out repairs to the bridge, including structural repairs as well as conservation work to e.g. rebed loose or missing brickwork. The site is neighboured by a residential area to the east, with large areas of grassland, woodland and a lake to the west and south.

COMMENTS:

Bats

During 2024, three hibernation surveys were undertaken in Jan-March (via internal inspections and static detectors). Three bat emergence surveys were undertaken in June-July 2024. Lastly, swarming surveys (via static detectors) were conducted between August and October 2024. DNA analysis of droppings from Chamber 5 of the moat bridge also confirmed presence of lesser horseshoe bats. Within regard to the surveys, the following was identified:

- Summer day roost and hibernation roost for at least one Natterer's bat (Chamber 3)
- Summer day roost and hibernation roost for at least two lesser horseshoe bats (Chamber 3 and 5)
- Autumn swarming site for barbastelle, *Myotis*, and brown long-eared bats

Under the Conservation of Habitats and Species Regulations 2017 it is an offence to damage or destroy bat resting places (including when bats are not present). 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 the following:

- The timing of works to avoid the key hibernation period
- Avoidance of light-spill or scaffolding during the swarming period
- Pre-works surveys/inspections for roosting bats
- Supervised hand removal of masonry
- Temporary exclusion of lesser horseshoes, if required
- Permanent retention of roosts in Chambers 3 and 5
- Provision of internal bat box in Chamber 5
- Provision of bat boxes on mature trees near the bridge

The above mitigation should be adhered to, and secured via a compliance condition. A lighting condition has also been recommended to ensure the bridge and bat roosts are not subject to an increase in artificial light spill.

Note - age of survey data

As per CIEEM's (Chartered Institute of Ecology and Environmental Management) Advice Note ([Advice-Note.pdf](#)), referred to in the Government's standing advice on protected species and development, if data were collected over 18 months ago, the results may no longer be valid. At present, considering the depth and timeframe of the surveys, the survey data is considered to fall within an appropriate time window, but the applicant should note that updated ecology surveys may be required for informing any future proposals concerning the bridge, and/or the remaining buildings on site.

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.

CONDITIONS:

1. Compliance with submitted documents

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

- Sections 7.1-7.15 (mitigation and enhancements) of the 'Ecological Impact Assessment, LC Ecological Services, February 2025'

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 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.

INFORMATIVE – bats

The moat bridge at Devizes Castle is used as a bat roost and swarming site for multiple species. Under the Conservation of Habitats and Species Regulations 2017 (as amended), 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 European Protected Species Licence will be required before any work is undertaken to implement this planning permission. Future works to the bridge could also breach this legislation and advice should be obtained from a professional bat ecologist before proceeding with work of this nature.

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

Ecologist Abi Gazzard	Date 01/04/2026
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