

Council Planning Consultation Response

ECOLOGY

Officer name:	Patrick Olshansky
Date:	08/04/2026
Application No:	PL/2026/00857
Proposal:	The proposed extension to the existing equestrian barn, the erection of an outdoor riding manège, the siting of a temporary rural worker's dwelling for the period of 3-years, in association with the breeding of horses, and the erection of an enclosure for the muck heap trailer.
Site Address:	Soho Grange Stud, Ashley Lane, Box, Wiltshire, SN13 8AN
Case Officer:	Lucie Turner

Recommendations:

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

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date submitted)
	BNG Assessment Area	EA, TCPA	Clarification and/or amendment to BNG area to achieve consistency. Applies to all relevant plans (including but not limited to the BNG metric, BNG reports, ecological reports, planning statements) before such plans are approved. See comments below.	No
	Ecological Mitigation	CP50, NPPF	Clarification of whether the eastern hedgerow and northern tree line fall within the red line, and precautionary methods for any works within their Root Protection Areas. See comments below.	No

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.

Information considered:

- Soho Grange Stud, Ashley, Preliminary Ecology Appraisal, Seasons Ecology, August 2025
- Soho Grange Stud, Ashley, BNG Baseline Habitat Plan, uploaded 9 Feb 2026
- Soho Grange Stud, Ashley, Post-development BNG Habitat Plan, uploaded 9 Feb 2026
- Soho Grange Stud, Ashley Biodiversity Net Gain Statement – Statutory Biodiversity Metric, Seasons Ecology, November 2025
- Statutory Biodiversity Metric Calculation Tool, completed: 15 December 2025, uploaded: 9 Feb 2026

COMMENTS:

The redline boundary contains a barn built on an artificial surface (hardstanding with a gravel access track) and the west and south of the site is made up of poor condition modified grassland (pasture). The site is bounded to the east by a hedgerow and by a line of trees to the north along the access road.

The proposal is to extend the barn, build a small muck heap near the northern boundary and a temporary worker's dwelling (mobile home or wood cabin) near the eastern boundary. The gravelled surface will be extended to access these new structures. An artificial artificially surfaced horse manage will be created to the west of the site.

Protected Species

Bats

The barn is frequently used and the PEA reports that it is well lit and supports no roost features, giving negligible roosting potential. Six trees with PRFs occur along the northern boundary, and the boundary hedgerows and trees provide foraging and commuting habitat linked to wider networks. All boundary vegetation is to be retained under the proposed plans, so no loss of PRF trees or connectivity is anticipated. No activity surveys were undertaken for the grassland, but the PEA identifies it as poor condition modified grassland, and larger areas of similar habitat occur adjacent to the site; its loss is therefore unlikely to significantly affect local bat foraging. The site already experiences baseline lighting and disturbance and the PEA notes that no additional lighting is proposed. Given the low level of risk identified, the precautionary measures in the PEA (protection of boundary vegetation and avoidance of nighttime works) are proportionate and sufficient. No further ecological input is required provided works comply with these measures; compliance will be secured by condition. A lighting condition will also be applied to control any future changes to lighting.

GCN

According to the PEA, no ponds occur within 500 m and habitats within the red line (artificial surfaces and poor-condition modified grassland) offer negligible suitability. Historical records lie within 250 m but are connected to the site only via sub-optimal habitat. The PEA concludes that the likelihood of GCN presence is very low and the risk of an offence unlikely. Precautionary measures set out in the PEA (maintaining a short sward, preventing entrapment, and ceasing works if GCN or other protected species are discovered) are proportionate to the level of risk. No further ecological input is required provided works comply with these measures; compliance will be secured by condition.

Badger and small mammals

The PEA identifies signs of badger activity outside the red line along southern and eastern hedgerows. No evidence is reported near the main development site. Occasional use of boundary vegetation surrounding construction area remains possible, but retention of these features and the availability of extensive surrounding habitat mean the risk of disturbance is low. The PEA's precautionary measures (pre-works walkover six weeks before commencement, protective fencing along the boundary vegetation, avoidance of nighttime works and preventing animal entrapment) are proportionate. No further ecological input is required provided works comply with these measures; compliance will be secured by condition.

Habitats Regulation Assessment (HRA)

The application site is located within consultation zones for bats 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 that site. 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 existing use of the site, the scale and nature

of the proposal, the retention of the boundary vegetation and the lack of additional lighting, the application is not likely to have significant impacts on the SAC and subsequently the application is screened out of Appropriate Assessment.

Compliance with CP50 (no net loss etc)

Areas of modified grassland will be lost to create more artificial surfaces. The manage is the largest of these, followed by the gravelled surface, some smaller areas of hardstanding and the additional buildings. This will be compensated for by mandatory BNG through the creation of other moderate condition neutral grassland, a new line of eight broadleaved trees and a traditional orchard.

In addition to statutory BNG, the applicant proposes two bat boxes, two bird boxes and new log piles for reptiles and amphibians. These features are not shown on any submitted plans, so a detailed enhancement plan will be secured by condition.

Submitted plans suggest that the eastern hedgerow and northern tree line fall outside of the red line boundary, yet their root protection areas are likely to extend into the working area. Elements of the scheme, particularly hardstanding, could affect roots if undertaken within these zones. A condition is therefore required to secure appropriate protection measures before works begin.

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

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

- There are discrepancies between the redline site areas used in the application form, the metric and the Biodiversity Net Gain Statement (Seasons Ecology, Nov 2025). It is understood that the area covered by the Ecology Report was broader than the redline. Clarification or amendment is required to ensure that the BNG calculations are accurate.

~~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	1.01Habitat units
	0.00 Hedgerow units
	0.00 Watercourse units
Are there any irreplaceable habitats on-site?	No
Has any habitat degradation of occurred?	No

Approval of the mandatory pre-commencement Biodiversity Gain Plan is a post-determination requirement under Schedule 7A of the Environment Act 2021. Under Articles 37C(2) and 37C(4) of the DMPO, the applicant must also provide details of 30-year maintenance and monitoring for habitat creation or enhancement. This information must accompany the Biodiversity Gain Plan. Early submission is encouraged but can be provided at discharge stage.

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 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.

~~DRAFT CONDITIONS: TBD~~

~~1. Compliance with Submitted Documents~~

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

- ~~• Soho Grange Stud, Ashley, Post-development BNG Habitat Plan, uploaded 9 Feb 2026~~
- ~~• Soho Grange Stud, Ashley Biodiversity Net Gain Statement – Statutory Biodiversity Metric, Seasons Ecology, November 2025~~
- ~~• Statutory Biodiversity Metric Calculation Tool, completed: 15 December 2025, uploaded: 9 Feb 2026~~

~~And:~~

- ~~• The Recommendations, Precautionary Protection Measures and Biodiversity Enhancements set out in Section 6 of the Soho Grange Stud, Ashley, Preliminary Ecology Appraisal, Seasons Ecology, August 2025~~

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

~~2. Ecological Protection~~

~~No development shall commence on site (including any vegetation removal or works to existing structures), until a construction plan and/or method statement for the protection of boundary vegetation and works within Root Protection Areas has been submitted to, and approved in writing by the Local Planning Authority. The development shall be carried out in strict accordance with the approved documents.~~

~~REASON: To ensure adequate protection, mitigation and compensation for protected species and priority habitats throughout the construction period.~~

~~3. HMMP~~

~~No development shall commence on site until a Habitat Management and Monitoring Plan (the HMMP), prepared in accordance with the statutory Biodiversity Gain Plan and including:–~~

- ~~• the roles and responsibilities of the people or organisation(s) delivering the HMMP;–~~
- ~~• the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the statutory Biodiversity Gain Plan and schedule for implementation;–~~
- ~~• the management and monitoring measures to maintain habitat in accordance with the statutory Biodiversity Gain Plan for a period of 30 years from the completion of development~~

~~has been submitted to, and approved in writing by, the local planning authority. The created and/or enhanced habitat shall be managed and maintained in accordance with the statutory HMMP at all times thereafter. –~~

~~REASON: To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990.–~~

~~4. Ecological Enhancement~~

~~Prior to the commencement of any works, including vegetation removal and demolition, details of the number, design and locations of opportunities for bats, birds, amphibians and reptiles (e.g. bat and bird boxes and habitat piles) shall be submitted to the local authority for approval. The approved details shall be implemented before occupation of the final works.~~

~~REASON: To provide mitigation/enhancement for biodiversity.~~

~~5. Artificial 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.~~

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

Ecologist	Date