

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	16/04/2026
Application number:	PL/2026/02127
Proposal:	Permission in Principle for Erection of Three Dwellings
Site address:	Hillbrook, Bath Road, Box, Corsham, SN13 8AE
Case officer:	Lucie Turner

Recommendations:

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☒	HRA required – further information needed
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Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date)
a)	HRA assessment for bat SAC	Habitat Regulations, NPPF, Wiltshire CP50	16/04/2026 -An ecological/bat assessment of the site -A statement of any vegetation proposed for removal -Clarification of whether any lighting is proposed -Proposed mitigation, as relevant, and mechanism for securing this	

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:

- Site Location Plan, Illewellyn harker lowe, February 2026
- Design and Access Statement, unauthored, undated
- Planning Statement, LPC, March 2026
- Proposed Site Plan, Illewellyn harker lowe, February 2026

The site comprises a grassland field bordered by some trees/hedging to the south, woodland to the west and hedgerow to the southeast. As per aerial imagery and site photographs, there appears to be some hedgerow/plantings running through the west of the site, parallel to the site boundary.

COMMENTS:

Bath and Bradford-on-Avon Bats Special Area for Conservation (SAC)

The site is located within a number of Bechstein's, Lesser Horseshoe and Greater Horseshoe bat roost buffers (consultation zones) associated with the Bath and Bradford-on-Avon SAC. The current proposal therefore has potential to result in significant adverse impact on the special features of the Bath and Bradford-on-Avon SAC.

Based on the information provided, the current proposal could result in the loss of potential foraging and commuting habitat, as well as disturbance of habitat at the peripheries during construction and post-development via, e.g., new lighting. It is understood that the site is currently unlit. It is not known whether any trees are proposed for removal.

For projects that could impact a European habitats site, a habitats regulations assessment (HRA) must be carried out to determine the potential significant effects and the suitability of any measures proposed to avoid or mitigate those effects.

Paragraph 1A of regulation 70 of the Conservation of Habitats and Species Regulations 2017 states that the assessment provisions apply to "*granting permission in principle under section 59A of the TCPA 1990 (Development orders: permission in principle)*". This makes it clear that the LPA must make an Appropriate Assessment (AA) of the implications of the Proposal before any Permission in Principle is authorised. Further information can be found within the [Government's guidance for applications for permission in principle](#).

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. The following is required:

- An ecological assessment of the site, providing information on existing habitats and potential impacts on bats. This may need to include bat activity surveys.
- A clear statement of any vegetation proposed for removal, including clarification of whether any tree removal is proposed
- Clarification of whether any lighting is proposed
- Proposed mitigation (e.g., habitat creation)

The applicant should note that there must also be a suitable mechanism in place through which to secure all necessary mitigation (if required for positive conclusion of AA) at the Permission in Principle stage. Conditions to secure mitigation cannot be imposed for this type of application.

Protected species and habitats

The site and surrounding area may be suitable for use by bats, badgers, nesting birds, amphibians, reptiles and other protected and notable wildlife. The By Brook, a County Wildlife Site and Priority Habitat, lies 35m northeast of the site boundary, with otter records associated with this waterway. The woodland adjacent to the northwest of the site is also categorised as Priority Habitat (deciduous woodland).

Core Policy 50 of the Wiltshire Core Strategy requires all development to demonstrate:

- i. No net loss of local biodiversity resource and
- ii. Secure the integrity of local ecological networks

Evidence demonstrating no net loss of local biodiversity resource and that the integrity of ecological networks would need to be submitted and reviewed by the LPA's ecology team at the

technical details consent stage. Ecological information submitted at that stage should consider the presence of protected and Priority species and habitats, and any relevant mitigation as well as enhancements.

Biodiversity Net Gain

The grant of permission in principle is not within the scope of biodiversity net gain (as it is not a grant of planning permission). The subsequent technical details consent will be subject to the biodiversity gain condition. Please note that applications subject to the biodiversity gain condition must be accompanied by minimum information set out in [Article 7 of The Town and Country Planning \(Development Management Procedure\) \(England\) Order 2015](#), which includes:

- [the completed metric calculation tool](#) showing the calculations of the pre-development biodiversity value of the onsite habitat on the date of application (or proposed earlier date) including the publication date of the biodiversity metric used to calculate that value;
- a description of any [irreplaceable habitat](#) (as set out in [column 1 of the Schedule to the Biodiversity Gain Requirements \(Irreplaceable Habitat\) Regulations 2024](#)) on the land to which the application relates, that exists on the date of application, (or an earlier date); and
- plan(s), drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application (or earlier proposed date), including any irreplaceable habitat (if applicable).

Note: this is a summary, please refer to Paragraph: 011 [Biodiversity net gain - GOV.UK](#) for full details.

If the applicant considers that the development would not be subject to the biodiversity gain condition, Schedule 7A of the Town and Country Planning Act 1990 the applicant must provide a statement as part of the planning application setting out the reasons why they believe this is the case. Submission of a completed metric calculation tool may be necessary to evidence the statement.

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 sites or features of such sites. The information outlined above must therefore be submitted and reviewed by the LPA's ecology team prior to determination. I therefore maintain a holding objection.

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

Ecologist	Date
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