

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	16/04/2026
Application number:	PL/2026/01591
Proposal:	Replacement of roofing and general refurbishment works
Site address:	St Patricks Garrison Church, St Patricks Avenue, Tidworth, SP9 7BS
Case officer:	Adrian Smith

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:

- Planning, Design and Access Statement, Della Valle Architects, March 2026
- Proposed Elevation C-C, Della Valle Architects, August 2025
- Proposed Elevations B-B, D-D, Della Valle Architects, August 2025
- Proposed Elevations E-E, F-F, G-G and H-H, Della Valle Architects, August 2025
- Bat Dusk Emergence Survey, J Taylor Ecology Consulting, October 2025

The site comprises a church proposed for extensive refurbishment works, including a replacement roof covering, repairs to brickwork/stonework, new flashing, works to the windows and replacement doors.

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 potential impact of recreational pressure on stone curlew, in combination with other plans and projects, must be considered.

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 since there is no proposal to create any overnight accommodation, there would be no overall mechanism for adverse effect. The HRA has concluded that the application is not likely to have significant impacts on Salisbury Plain SPA and subsequently the application is screened out of Appropriate Assessment.

River Avon Special Area of Conservation (SAC) Hampshire Catchment

This development falls within the catchment of the River Avon SAC and has potential to cause adverse effects alone or in combination with other developments through discharge of phosphorus in wastewater.

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 since there is no proposal to create any overnight accommodation, there would be no overall mechanism for adverse effect. The HRA has concluded that the application is not likely to have significant impacts on the SAC and subsequently the application is screened out of Appropriate Assessment.

Protected species

A preliminary roost assessment in May 2024 identified that the church has high bat roosting potential. As such, three emergence surveys were conducted in May-July 2025 under appropriate conditions. No bats were observed emerging from the building. However, in July 2025, a bat dropping was observed on a tile above the flat roof of the pump room.

A Mobile Elevating Work Platform (MEWP) was used in October 2025 to further inspect areas of the building above the flat roof of the pump room. The areas above the pump room had no suitable roosting opportunities and were well-sealed. Comprehensive inspections of other potential features were carried out with the MEWP and endoscope, and the report clarifies that some of the potential openings (e.g., knapen vents) offered very restricted turning spaces and lacked any evidence of use by bats. Overall, the report concludes that it is unlikely the building is used by roosting bats. Based on the evidence provided and extent of survey effort, I support this conclusion. The precautionary mitigation strategy detailed within the bat survey report (including a site briefing/toolbox talk and actions to take if bats or signs of bats are found) must be adhered to and secured via condition.

A number of bat passes were recorded along the site boundaries, and alongside the church. The species recorded were pipistrelles, serotines and noctules. Further, a dead brown long-eared bat was found under a mature tree 10m to the west of the church. It is clear that the wider site supports notable levels of foraging and commuting activity. An increase in artificial lux levels can deter bats which could result in roost abandonment and/or the severance of key foraging areas. This will likely result in a significant negative impact upon the health of bat populations across the region. Any new lighting should therefore be for the purposes for safe access and security and be in accordance with 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 GN08-18 "Bats and artificial lighting in the UK", issued by the Bat Conservation Trust and Institution of Lighting Professionals.

The adults, young, eggs and nests of all species of birds are protected by the Wildlife and Countryside Act 1981 (as amended) while they are breeding. Please be advised that works should not take place that will harm nesting birds (such as vegetation clearance or building demolition) from March to August inclusive. The applicant is advised to check any structure or vegetation capable of supporting breeding birds and delay removing or altering such features until after young birds have fledged.

Given that the works are restricted to the building and will not impact any other habitats, it is unlikely that any other protected species will be adversely affected.

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 documents:

- Section 5 'Required Mitigation' of the 'Bat Dusk Emergence Survey, J Taylor Ecology Consulting, October 2025'

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

Informative – bats

There is a low risk that roosting 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.

Informative – Artificial Lighting

The habitat within the proposed development site and the surrounding area is suitable for roosting, foraging and commuting bats. An increase in artificial lux levels can deter bats which could result in roost abandonment and/or the severance of key foraging areas. This will likely result in a significant negative impact upon the health of bat populations across the region. Artificial light at night can have a substantial adverse effect on biodiversity. Any new lighting should be for the purposes for safe access and security and be in accordance with 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 GN08-18 "Bats and artificial lighting in the UK", issued by the Bat Conservation Trust and Institution of Lighting Professionals.

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

Ecologist Abi Gazzard	Date 16/04/2026
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