

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	28/04/2026
Application number:	PL/2026/01331
Proposal:	Remove existing leaking roofs, repair, felt and refelt, insulate and replace roofs using existing tiles. Repairs to two chimney stacks and leaking drainpipes/repointing to damaged areas
Site address:	19 Huntingdon Street, Bradford On Avon, BA15 1RF
Case officer:	Fiona Webb

Recommendations:

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

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date)
1.	Bats and bat SAC	Habitat Regulations, NPPF, Wiltshire CP50	28/04/2026 - The results of bat survey(s) of the building - A mitigation plan, as appropriate - Confirmation of whether any new lighting is proposed	

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:

- Design & Access Statement, Andrew Taberner Architects, March 2026
- Sketched plan

The site comprises an end-terrace listed cottage proposed for roof and chimney repairs.

COMMENTS:

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

The site is located within multiple Greater Horseshoe and Lesser Horseshoe roost buffers associated with 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. 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.

The building may possess features suitable for use by roosting bats, including access into the roof void, gaps under tiles or in the brickwork. Further, there are records of roosting horseshoe bats within 280m of the site.

Considering the potential risk to bats and features associated with the SAC, 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. Namely, the applicant will need to provide:

- The results of preliminary bat roost assessment, and any subsequent bat survey(s), of the building
- A mitigation plan, as appropriate
- Confirmation of whether any new lighting is proposed

Other protected sites and species

As above, a bat survey (and mitigation, if needed) is necessary. Further, the applicant should note that 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 works to accessible roof voids) 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.

It is understood that the works will not impact on any green habitat, and therefore are unlikely to adversely affect other protected taxa or sites.

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.

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 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.

CONDITIONS: wording to be provided once above issue addressed.

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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