

Council Planning Consultation Response

ECOLOGY

Officer name:	Elizabeth Burrows, Senior Ecologist
Date:	01/05/2026
Application No:	PL/2026/01072
Proposal:	Outline planning application, with all matters reserved except for the main point of access from Devizes Road, for the demolition of existing building and development of up to 80 dwellings, public open space, drainage, landscaping and ancillary works.
Site Address:	Land North of Devizes Road, Hilpertown, Trowbridge
Case Officer:	Jemma Foster

Recommendations:

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

Appropriate Assessment with a positive conclusion must be completed and endorsed by Natural England, who must agree the conclusion (within 21 days) prior to this application being permitted. Comments dated 23rd April 2026 recommend a holding objection.

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed
1	Baseline data	CP50	Updated Ecological Impact Assessment in response to: 2026 Botanical Surveys. Issues raised in relation to bats survey and assessment.	
2	Mitigation (bats, GHS, LHS)	CP50, NPPF (paragraph 187(a) and (d))	Mitigation for impacts on foraging bats (specifically GHS) and roosting bats (specifically GHS and LHS).	
3	Bath and Bradford on Avon Bat SAC	Hab Regs, CP50. NPPF 187. (a)	Amended Combined Parameter Plans – 01. Dwg no. CPP-01. (Thrive Architects, 09/01/2026) addressing issues raised. Recreational impact mitigation strategy addressing issues raised.	
4	Biodiversity Net Gain	Town and Country Planning Act	2026 grassland survey. Clarification of Site area. Amended metric and condition assessment with issues raised addressed.	

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:

- Ecological Impact Assessment. Land off Devizes Road, Hilperton. (ge Consulting, 05 February 2026).
- Combined Parameter Plans – 01. Dwg no. CPP-01. (Thrive Architects, 09/01/2026).
- Concept Master Plan – 01. Dwg no. CMP-01. (Thrive Architects, 17/12/2026).
- Statutory Metric Calculator (05/02/2026).
- Biodiversity Net Gain Statement and Assessment. (ge Consulting, 05 February 2026).

COMMENTS:

The submitted Ecological Impact Assessment (EclIA) references and relies on surveys and reports completed a previous application/s (Ecological Impact Assessment, Table 1). These provide useful ecology context however to ensure the data is easily accessible for review the reports should be submitted with this application.

The other fields of neutral grassland are reported to comprise largely coarse, species-poor permanent pasture with a limited forb assemblage. **Updated botanical surveys are anticipated in spring/summer 2026, the results of which are required to inform the Biodiversity Net Gain Assessment and impact assessment.** Until these surveys are submitted, the comments below are provided without prejudice.

The Site is reported to comprise *‘several parcels of other neutral grassland, bounded by a mixture of native hedgerows, mixed scrub, trees, specimen trees. The Site includes a complex of agricultural buildings both active and disused’*(Ecological Impact Assessment, 05/02/2026). The Site is bounded to the east and north by mature native hedgerows with trees and qualifying as Habitats of Principal Importance. The Concept Master Plan indicates that hedgerow impacts could be avoided and minimised to an acceptable level.

Based on the information submitted it is agreed that the following protected and notable species are unlikely to be present and therefore unlikely to represent a constraint to development great crested newts, reptiles and dormice.

Birds

The site supports nesting and foraging habitat for birds including confirmation that swallow nest in the barn. To ensure compliance with CP50 and NPPF (paragraph 187 (d)) mitigation for birds must be secured by condition.

Badger

Evidence that badgers forage and commuted across the site and an outlier sett at the eastern boundary adjacent to Whaddon Lane. Badgers and their setts (tunnels and chambers where they live) are protected by law and any sett disturbance that can't be avoided must be carried out under license from Natural England.

Bats

Paragraph 2.6 and Appendix 2 of the Ecological Assessment states that the report is based on a summary of data obtained from third-party sources. **Clarification of if GE Consulting has independently verified the bat call analysis is required.**

Although the bat survey methodology is set out in Appendix 2, there is no confirmation that this methodology has been verified or endorsed by the third-party ecologist responsible for the original survey work. **To properly demonstrate the validity and reliability of the bat assessment, the primary survey report must be submitted, or alternatively a formal statement confirming the accuracy and validity of the data, analysis, and methodology must be provided by the third-party ecologist.**

The assessment of bat foraging and commuting importance has been undertaken solely using previously analysed and summarised bat data and is therefore reliant on desk-based interpretation without the benefit of any direct field observations. As set out in paragraph 8.1.2 of the Bat Survey Guidelines, it is good practice

to undertake manual activity surveys to provide site-specific information on bat behaviour, including levels of activity, numbers of bats, use of the site for foraging or commuting, and direction of travel. Furthermore, the available data has not been analysed to identify call characteristics indicative of feeding activity. **Clarification and justification of how bat activity, including foraging and commuting use of the site, has been determined is required.**

In addition the following issues must be addressed to enable the bat assessment to be reviewed:

- Graphs 1 and 2 use multiple shades of blue meaning it is very difficult to distinguish which blue relates to which species.
- The title of Graph 1 indicates that all species are included but pipistrelle bats that are reported in the text above to the most abundant are absent from the graph.
- The detector references used in the graphs and text must be clarified and accord with the figures. Figure 2 refers to Automated Detector Locations A1-9 whereas the graphs refer to L1-L9.
- Inclusion of October bat transect survey results.
- The bat transect surveys were undertaken by either one or two surveyors; where only one surveyor was used, the reduced survey coverage and effort requires justification.
- The assessment must consider the abundance of greater horseshoe bat (GHS) foraging habitat in the locality. Aerial photography indicates pasture is limited in the locality.

Seven trees were identified as having features suitable for roosting bats; however, surveys indicate that none are currently used as roosts. Surveys confirm that Building B1 supports a day roost for small numbers of common pipistrelle, greater horseshoe (GHS), and lesser horseshoe (LHS) bats. It is not agreed that the active stable building is not used by roosting bats. Static detector data confirm that GHS and LHS bats enter the building, and the absence of droppings or feeding remains is likely attributable to regular stable cleaning. It is therefore considered highly likely that the building is used by GHS and LHS bats as a night roost.

Until the issues raised have been satisfactorily addressed, the comments set out below are provided without prejudice.

The site is not located within, or immediately adjacent to, any statutory or non-statutory designated sites for nature conservation; however, it lies within both the Yellow and Grey Zones of the Trowbridge and Westbury Bat Mitigation Strategy (TWBMS), as acknowledged within the Ecological Impact Assessment (EclA). The interpretation of the survey results in relation to the value of the site to SAC bats (LHS, GHS and Bechstein) in the context of the wider local landscape is not agreed with.

The site is situated within the core sustenance zone of a Bechstein's bat maternity roost, and evidence from radio-tracking studies and ringing projects has demonstrated that Bechstein's bats roosting in Green Lane Wood and Biss Wood forage in areas north of the A361 and commute to swarming and hibernation sites at Box Mine SSSI. There are multiple LHS and GHS maternity and hibernation roosts in the wider landscape around Trowbridge and as such the site is located in landscape that is highly likely to be of importance to the SAC's qualifying species.

As acknowledged within the EclA, the site provides suitable commuting and foraging habitat for all SAC bat species. Pasture represents optimum foraging habitat for GHS bats, while linear features such as tree lines and scrub constitute favoured commuting habitat for all SAC qualifying species. Surveys further confirm that both LHS and GHS bats roost within buildings on the site, and that all three SAC bat species regularly utilise habitats across the site. These species were recorded during every month surveyed and detected on all deployed automated bat detectors. Given the inherent difficulty in reliably distinguishing Bechstein's bat calls from those of other *Myotis* species, the presence of this species is reasonably assumed. Apparent low levels of recording should not, in isolation, be interpreted as evidence of low site importance, as such conclusions fail to account for bat behaviour, echolocation characteristics, and recognised survey limitations.

Taken together, this evidence confirms habitats within the site have roosting, foraging and commuting functionality for SAC bats and that the site plays a functional role within the wider landscape. Unless further justification is provided the Ecological Impact Assessment must be amended to reflect this.

The proposed Landscape Buffer and Ecological Corridor (approximately 50m wide) is welcomed. It is essential that this corridor is designed and delivered with the primary objective of providing Core Bat Habitat

and a coherent ecological network, to ensure compliance with Policy CP50 and the NPPF (paragraph 187(a) and (d))

However, it is not agreed that the proposed Landscape Buffer and Ecological Corridor would constitute an enhancement for foraging bats. The development would result in the loss of approximately 3 hectares of preferred habitat (noting this is a rough estimate) currently used by foraging GHS bats and GHS and LHS day roost and night perch. The Landscape Buffer and Ecological Corridor is proposed on habitat that is already confirmed foraging habitat utilised by foraging bats. Consequently, even if it is assumed that the Landscape Buffer and Ecological Corridor will deliver optimal foraging habitat for GHS bats, there would still be an overall unacceptable net loss of foraging resource as a result of the development which is contrary to CP50.

The location of bat roost mitigation must also be shown on the plans.

Please refer to Draft AA below for further comments relating to impacts on the Bath and Bradford on Avon Bat SAC.

Habitats Regulation Assessment (HRA)

Bath and Bradford on Avon Bat Special Area of Conservation (SAC)

The application site is within multiple a consultation zones for bats associated with the Bath & Bradford on Avon Bats Special Area of Conservation (SAC) (TWBMS Grey Hatched Zone Medium risk for increased recreational impacts and TWBMS Yellow Zone Medium risk for habitat loss) and therefore has potential to result in significant adverse impact on the special features of that site. 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.

As detailed in the draft Appropriate Assessment below insufficient information has so far been submitted to enable the AA to be concluded positively. Once concluded positively it must be sent to and agreed with Natural England prior to the application being determined. **Please refer to Bold text in Draft AA below.**

Draft Appropriate Assessment

PART A: INFORMATION REVIEWED	
Information about the plan or project	Planning application PL/2026/01072 Outline planning application, with all matters reserved except for the main point of access from Devizes Road, for the demolition of existing building and development of up to 80 dwellings, public open space, drainage, landscaping and ancillary works. Address: Land North of Devizes Road, Hilperton, Trowbridge The Site is reported to comprise 'several parcels of other neutral grassland, bounded by a mixture of native hedgerows, mixed scrub, trees, specimen trees. The Site includes a complex of agricultural buildings both active and disused. Surveys have confirmed that habitats within the site are used by roosting, foraging and commuting SAC qualifying species GHS, LHS and Bechstein bat (SAC bats) functionality for SAC bats and considered by the Council ecologist to be functional role within the wider landscape.
European Site	Bath and Bradford on Avon Bats Special Area of Conservation (SAC)
List of European Site interest features	This development is screened into appropriate assessment in relation to the Bath and Bradford on Avon Bats SAC as it lies within both the yellow and grey zones where the Council has identified a potential for development to lead to an increase in recreational pressure at woodlands in south Trowbridge and to reduce bat habitat in a zone beyond the woodlands. The site is also within a core roost buffer (associated with Bath and Bradford on Avon Bats SAC) for a Bechstein's bat maternity roost (~1km southeast).

	Background information for this appropriate assessment is contained in the Trowbridge & Westbury Bat Mitigation Strategy (TWBMS) which was adopted as of July 22nd 2025. The SAC's qualifying Features are as follows: 1. Bechstein's bat <i>Myotis bechsteinii</i> 2. Greater horseshoe bat <i>Rhinolophus ferrumequinum</i> 3. Lesser horseshoe bat <i>Rhinolophus hipposideros</i> The conservation objectives for the site are: "To ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; • The extent and distribution of the habitats of qualifying species; • The structure and function of the habitats of qualifying species; • The supporting processes on which the habitats of qualifying species rely • The populations of qualifying species; and • The distribution of qualifying species within the site." Publication Date: 27th November 2018 – version 3. This document updates and replaces an earlier version dated 30 June 2014 to reflect the consolidation of the Habitats Regulations 2017.
Information about the site	Supplementary advice was published by Natural England last updated on 20 March 2019 and sets out further details of the requirements needed to achieve the conservation objectives. Of particular relevance to the Trowbridge area is the need to "Maintain the presence, structure and quality of any linear landscape features which function as flightlines. These should remain unlit functioning as dark corridors". In the Site Improvement Plan dated 1 April 2015, the lack of knowledge about the roosting habits of Bechstein's and the foraging / commuting habitats of all three SAC species is judged by Natural England to be a threat to achieving the conservation objectives of the SAC. Bat ringing data has shown the same bats using Green Lane Wood (and surrounding woodlands) and the SAC. The woodlands are therefore considered to be functionally linked to the SAC and it is possible the conservation objectives for the SAC may not be met if the bats are disturbed or prevented from breeding there. Studies have shown that Bechstein's bats are not confined to the woodlands but travel to find additional foraging and roosts outside them. Consequently, the TWBMS recognises the importance of both the woodlands and their surrounding habitats through 2 buffer zones. i) Extending 600m from the woodland edge, the red zone is an area of development restraint due to the high probability that this zone is of current and future importance for maintaining the breeding colonies. ii) Beyond this, the yellow zone, which takes into consideration the foraging areas and flightlines of horseshoe bats, is anticipated to be able to accept a degree of development pressure provided applications are designed in accordance with the principles in the TWBMS. iii) The grey hatched zone identifies the distance within which 75% of visitors to Green Lane Wood, Biss Wood, Picket and Clanger Woods are expected to come from and a package of mitigation measures is identified in the TWBMS to accommodate the anticipated growth within this zone.
Other relevant plans, projects or policies.	• Wiltshire Core Strategy adopted January 2015 • Trowbridge & Westbury Bat Mitigation Strategy (adopted 2025) • Bat Special Areas of Conservation (SAC) Planning Guidance for Wiltshire (September 2015).

Assessment against TWBMS criteria

Item	TWBMS criteria	Details provided for Application
1	Surveys should be completed: • In accordance with Council pre-application advice if provided • In accordance with BCT Good Practice Guidelines and the specifications described in Section 6 of the TWBMS • Confirming the location of core bats habitat (commuting and foraging). • Confirming the status of roosts.	Bat surveys have been carried out in 2025 and reported in the Ecological Impact Assessment. Land off Devizes Road, Hilperton. (ge Consulting, 05 February 2026). The issues raised in the Section on Bats above must be resolved to confirm these surveys are acceptable. Without prejudice surveys have confirmed the site supports foraging and commuting habitat (pasture, hedgerow, scrub and trees) suitable for and used by all three SAC qualifying species. Surveys have confirmed the presence of day roost and night perch used by LHS and GHS bats. The Site has an important function role in the landscape for the commuting SAC bats.
2	Masterplan to be provided which covers entire allocation (referenced in WHSAP housing policies).	As this is not a WHSAP site this is not applicable. Refer to comments on parameters plan below.
3	<u>For outline applications</u>, Ecological Parameters Plan (para 161) to address: • Specific site design measures. • Commuting functionality. • Foraging functionality. • Roosting functionality. • Core bat habitat provision. • Additional green infrastructure (Suitable alternative natural green space SANG).	The following observations are made however please note these are made without prejudice and maybe subject to change once the functionality of the site to SAC species has been agreed The Combined Parameter Plans – 01. Dwg no. CPP-01. (Thrive Architects, 09/01/2026) includes: A 50m Landscape Buffer and Ecological Corridor. 10m and 5m landscape buffer along part of the western boundary. Figure 4: Post Development Biodiversity Net Gain Plan (4/02/2026) embedded in Ecological Impact Assessment includes proposed habitats. The proposed 50 m-wide Landscape Buffer and Ecological Corridor is welcomed and provided it is delivered primarily as Core Bat Habitat and not subject to urbanisation, should ensure the continued north–south movement of bats across In order to ensure the Landscape Buffer and Ecological Corridor is not adversely impacted by urbanisation a sensitive lighting strategy must be secured by condition. In addition, whilst it is accepted that public access can be achieved it must not compromise the primary objective of delivering Core Bat Habitat. The development is considered to result in a loss of GHS foraging habitat. Additional foraging habitat for GHS is required. To ensure are required measures are secured plans must be amended to include the following: • Lighting restrictions. • Replacement roost location. • GHB foraging habitat.

		• Quantum of additional green infrastructure (including area m²). • Public access requirements.
4	Statutory Biodiversity Metric calculation demonstrating no net loss of biodiversity.	Statutory Metric Calculator (05/02/2026) submitted but issues need to be addressed. Please refer to Biodiversity Net Gain section below.
5	<u>For reserved matters and full applications</u> , an Ecological Mitigation Plan to be submitted containing (para 162): (i) Scaled drawing to show • Details of replacement roosts. • Commuting routes and foraging habitat to be retained, created and enhanced. • Location/extent and full landscape specifications for tree and shrub planting, wildflower grassland etc. • Limit of built development.	Not applicable. This is an outline application.
6	The EMP proposals submitted for item 5 above are in accordance with the standards for habitat mitigation and management as described at section 8.2 and Figure 6 in the TWBMS.	Not applicable. This is an outline application.
7	<u>For Reserved Matters and Full applications</u> , CEMP to set out: • Measures to protect retained and created core bat habitat during construction. • Schedule of works covering enhancement and creation of core bat habitat features.	Not applicable. This is an outline application. A CEMP must be secured by condition.
8	Application to demonstrate retained core bat habitat connects to the wider habitat network.	The Combined Parameter Plans – 01. Dwg no. CPP-01. (Thrive Architects, 09/01/2026) includes a 50m Landscape Buffer and Ecological Corridor demonstrating that retained core bat habitat would connect to the wider habitat network (refer to Item 3). Further information is required to demonstrate how GHS foraging habitat and roosting functionality will be maintained.
9	Application to demonstrate measure to ensure core bat habitat will remain relatively undisturbed by the effects of urbanisation.	Please refer to further information requested in Item 3 above.
10	<u>For Reserved Matters and Full applications</u> , LEMP to set out: • Management objective for core bat habitat. • Measures to ensure long-term management of core bat habitat.	Not applicable. This is an outline application. A LEMP must be secured by condition..

	• Management roles and responsibilities. • Core bat habitat delivery time scales. • Time scales for delivery of functional alternative green space. • Review and monitoring mechanism.	
11	The potential impacts of lighting are adequately modelled and assessed with appropriate mitigation included to minimise the effects artificial lighting across the site in accordance with section 8.3.	Anticipated to be secured by lighting condition.
12	An appropriate lighting monitoring regime has been provided.	Anticipated to be secured by lighting condition.
13	Greenfield sites Yellow Zone: The applicant agrees that a financial contribution towards the Council led scheme for mitigating residual effects from loss / degradation of bat habitat will be secured by S106.	For residential development, the 2026-27 strategic financial mitigation contribution is £1000.00 per dwelling plus admin fee, which will be payable through S106, S111 or unilateral undertaking.
15	Grey Hatched Zone: Deliver sufficient natural recreational focused space/ Suitable Alternative Natural Greenspace (SANG) plus monitoring fee.	The site is lies within walking distance to Green Lane Wood (approximately 1.6 km via footpaths). Footpaths connected to the site offer possible circular walking routes however most require crossing the A361 or require walking along sections of road. Increased recreational impacts on important bat woodland is predicted. It is proposed that 1ha of alternative green space (SANG) will be provided in the Landscape Buffer and Ecological Corridor. In accordance with SANG guidelines 1.536ha of alternative green space would be required. The Landscape Buffer and Ecological Corridor measures approximately 1ha and would include SUDS and scrub restricting the space available for dog walkers. Public access must not compromise the primary objective of delivering Core Bat Habitat. The Landscape Buffer and Ecological Corridor would not meet the requirements of SANG. Additional alternative green space is required. Mitigation via developer contributions for developments over 50 dwellings are not in accordance with the strategy. The council will be required to monitor the alternative green space which must be funded by developer contributions.

CONCLUSION	
Is the project likely to affect site integrity?	
a) Alone?	Yes

b) In combination with other plans or projects?	Yes
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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 (Statutory Metric Calculator, 05/02/2026) has been submitted (including the condition assessment sheets (if applicable) and maps).

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

- Completion of botanical surveys. These must include quadrat data to justify species m2 as required by the relevant criteria of the condition assessments.
- Clarification of Site Area. The application form states the Site Area is 3.99 hectares whereas the metric states it as 4.03 hectares.
- Further justification of other neutral grassland failing criterion A and F, such as quadrat data.
- Further justification of modified grassland failing criterion A, such as quadrat data.

Confirmation of how the development will achieve BNG is a post-determination matter however it is noted that the metric currently indicates off-site units will be required to deliver the mandatory BNG requirement. In addition, the Biodiversity Gain Plan must be accompanied by a completed Biodiversity Metric with the following issues addressed:

- Evidence of enhanced habitat creation.
- Evidence that other neutral grassland of good condition will be achievable in POS given likely high levels of public use and management limitations. To ensure the predicted net change is achievable a more realistic condition would be preferred.

The proposed BNG is considered 'significant' due to:

- (i) the scale and nature of the application (major);
- (ii) units required, and
- (iii) the BNG proposed (including medium distinctiveness habitats (other neutral grassland, mixed scrub and species-rich native hedge).

A Habitat Management and Monitoring Plan (HMMP) will be required, and must be secured via condition.

In order for the council to fulfil its BNG monitoring responsibilities, a Biodiversity Net Gain On-site 30 year Monitoring Fee must be secured through a Section 111, Section 106 or Unilateral Undertaking with contributions secured prior to commencement. The applicant should be directed to the Guidance Note for Completing Agreements Under S.111 of the Local Government Act 1972. Where the applicant elects to use the S111 process the fee must be paid and S111 signed by both the applicant and the council on the granting of planning permission.

In order for the council to fulfil its monitoring obligations, the BNG monitoring fee would be £11165 plus legal fees payable on commencement of development.

Summary of planning obligation/ S106 requirements

1. £925.00 per dwelling to contribute towards the council's strategic recreational pressure mitigation scheme
2. Biodiversity Net Gain On-site 30 year Monitoring Fee of £11165 plus legal fees.
3. SANG monitoring contribution.

DRAFT CONDITIONS:

The following, or similarly worded, conditions are recommended:

Conditions:

1. Compliance with submitted documents

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

- Combined Parameter Plans – 01. Dwg no. CPP-01 [TBC]. (REF TBC).
- Concept Master Plan – 01. Dwg no. CMP-01 [TBC]. (REF TBS).

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

2. Artificial Lighting

No external lighting shall be installed on site until plans showing the type of light appliance, the height and position of fitting, illumination levels and light spillage have been submitted to and approved in writing by the Local Planning Authority. 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.

Where light spill has the potential to impact bat habitat, a lighting impact assessment must be submitted with the reserved matter application(s) to demonstrate the requirements of section 8.3 of the Trowbridge and Westbury Bat Mitigation Strategy February are met.

The approved lighting shall be installed and maintained in accordance with the approved details and no additional external lighting shall be installed.

This condition will be discharged when a post-development lighting survey conducted in accordance with the Trowbridge and Westbury Bat Mitigation Strategy has been submitted to the Local Planning Authority demonstrating compliance with the approved lighting plans, having implemented and retested any necessary remedial measures.

REASON: In the interests of the amenities of the area, to minimise unnecessary light spillage above and outside the development site and to ensure lighting meets the requirements of the Trowbridge Bat Mitigation Strategy and the Habitat Regulations Assessment.

3. CONSTRUCTION ENVIRONMENT MANAGEMENT PLAN (CEMP)

Prior to the commencement of works, including demolition, ground works/excavation, site clearance, vegetation clearance and boundary treatment works, a Construction Environmental Management Plan (CEMP) shall be submitted to the local planning authority for approval in writing. The Plan shall provide details of the avoidance, mitigation and protective measures to be implemented before and during the construction phase, including but not necessarily limited to, the following:

- a) Identification of ecological protection areas/buffer zones (50m Landscape Buffer and Ecological Corridor, hedgerow and trees).
- b) Details of physical means of protection of buffers zones during construction.
- c) Details and timescale for delivery of capital works of 50m Landscape Buffer and Ecological Corridor/ alternative green space.
- d) Working method statements for protected/priority species, such as bats, nesting birds and reptiles.
- e) Work schedules for activities with specific timing requirements in order to avoid/reduce potential harm to ecological receptors; including details of when a licensed ecologist and/or ecological clerk of works (ECoW) shall be present on site.
- f) Key personnel, responsibilities and contact details (including Site Manager and ecologist/ECoW).

Development shall be carried out in strict accordance with the approved CEMP.

REASON: To ensure adequate protection and mitigation for ecological receptors prior to and during construction, and that works are undertaken in line with current best practice and industry standards and are supervised by a suitably licensed and competent professional ecological consultant where applicable.

4. LANDSCAPE AND ECOLOGICAL MANAGEMENT PLAN (LEMP)

Prior to the start of construction, a Landscape and Ecology Management Plan (LEMP) shall be submitted to and approved in writing by the Local Planning Authority. The LEMP will include long term objectives and targets, management responsibilities and maintenance schedules for each ecological feature, including but not exclusively, the Alternative Green Space/ SANG within the development, together with a mechanism for monitoring success of the management prescriptions, incorporating review and necessary adaptive management to attain targets.

The LEMP shall be implemented in full and for the lifetime of the development in accordance with the approved details.

REASON:
To ensure the long-term management of landscape and ecological features retained and created by the development, for the benefit of visual amenity and biodiversity for the lifetime of the scheme.

6. ECOLOGICAL ENHANCEMENTS

Prior to the commencement of any works, including vegetation removal and demolition, details of the number, design and locations of ecological enhancement features including (delete as necessary) bat boxes, bird boxes, reptile features and hedgehog hibernacula shall be submitted to the Local Authority for approval. The approved details shall be implemented for the lifetime of the development and before completion of the final works.

Formatted: Justified

REASON: To provide mitigation /enhancement for biodiversity.

Informative:

Bat Roost
Buildings on site are used as a bat roost. 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.

General Protected Species

The applicant should note that under the terms of the Wildlife and Countryside Act (1981) and the Conservation of Habitats and Species Regulations 2017 (as amended) it is an offence to disturb or harm any protected species including for example, breeding birds and reptiles. The protection offered to some species such as bats, extends beyond the individual animals to the places they use for shelter or resting. Please note that this consent does not override the statutory protection afforded to any such species. In the event that your proposals could potentially affect a protected species you should seek the advice of a suitably qualified and experienced ecologist and consider the need for a licence from Natural England prior to commencing works. Please see Natural England’s website for further information on protected species.

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

Ecologist	Date