

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	31/12/2025, 13/05/2026
Application number:	PL/2025/08898
Proposal:	Demolition of existing 1.5 storey dwelling and construction of 6 new dwellings (2 1.5 storey and 4 1 storey), access, landscaping and associated works
Site address:	21A Hawkeridge, Westbury, BA13 4LA
Case officer:	Steven Sims

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 protected sites (Bath and Bradford on Avon Bat SAC)	Habitat Regulations, CP50, NPPF	31/12/2025 -Amendment of layout to demonstrate no net loss of SAC bat foraging and commuting functionality. -Amendment of layout that seeks to achieve no net loss of biodiversity (and repaired and updated BNG metric) -Confirmation of financial contributions for grey and yellow zones -Confirmation of external lighting strategy and lighting plan if required.	No (13/05/2026)
2	BNG	Town and Country Planning Act	31/12/2025 -Amendment and resubmission of metric addressing the issues raised.	Yes (13/05/2026) NB. Whilst there are no issues with the BNG metric per se, the plans show insufficient buffering/compensatory bat habitat

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:

- Preliminary Ecological Appraisal, All Ecology, September 2025
- Dusk Emergence Surve for Bats, All Ecology, September 2025
- Biodiversity Net Gain Design Stage Report, All Ecology Ltd, October 2025
- Ecology Mitigation Plan, Atelier 17 Ltd, July 2025
- Statutory Biodiversity Metric, Jacob Richardson, October 2025
- Condition assessment sheets, uploaded 10/11/2025
- Proposed Block Plan, Atelier 17 Ltd, Jul 2025
- [Cover Letter, Atelier 17 Ltd, March 2026](#)
- [Proposed Block Plan, Atelier 17 Ltd, Jul 2025, Rev A](#)
- [Statutory Biodiversity Metric, Jacob Richardson, March 2026](#)
- [Baseline Habitats Plan, All Ecology, undated](#)
- [Ecology Mitigation Plan, Atelier 17 Ltd, July 2025, Rev B](#)
- [Proposed Elevations, Atelier 17 Ltd, September 2025](#)

The site comprises a single dwelling (bungalow) and large garden. It is proposed to demolish the building and erect 6 new dwellings. The site is neighboured by residential properties to the east, west and south, with open farmland to the north and 36m west.

[Thank you for re-consulting Ecology following the submission of further documents; my second comments are shown in blue.](#)

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 in light of the HRA for the Wiltshire Core Strategy and the HRA for the Wiltshire Housing Site Allocations Plan it is screened into Appropriate Assessment due to the potential impact of recreational pressure on stone curlew in combination with other plans and projects.

A strategic Appropriate Assessment (AA) has been prepared pertaining to development within the 6.4km zone of influence that could result in a likely significant effect on the SPA as a result of an increase in recreational / visitor pressure. The AA reached a conclusion of no adverse effects on the integrity of the SPA or its qualifying features provided that the council's mitigation strategy continues to be implemented. Annual stone curlew monitoring and protection measures continue to be secured by the Council.

In March 2025 Natural England (NE) confirmed that the 2024 strategic AA for Salisbury Plain SPA continues to be supported by NE.

[In January 2026 Natural England \(NE\) confirmed that the strategic AA for Salisbury Plain SPA continues to be supported by NE until end of December 2026.](#)

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

The application site is located within the **grey** and **yellow** zones of the Trowbridge & Westbury Bat Mitigation Strategy (TWBMS) as well as a Bechstein 1.5km core roost buffer 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 the SAC. The application must be considered under the Habitats Regulations.

The grey medium risk zone represents an area where new residential development is likely to result in increased recreational use of important woodland bat sites. In order to conclude the AA favourably, new residential development proposals for 49 dwellings or less within the grey hatched medium recreational risk zone will be expected to provide a financial contribution of £925 per dwelling towards the council's strategic recreational pressure mitigation scheme detailed in section 9.2 of the TWBMS. The mitigation is required prior to the commencement of development and must be secured by planning obligations. Where a Section 106 agreement is not in place, mitigation can alternatively be secured under Section 111. Where the applicant elects to use a S111, the strategic mitigation must be secured upon the granting of planning permission by completion of S111 process.

The yellow medium risk zone represents areas where habitat has been shown to be of importance, and in particular takes into consideration the foraging areas and flightlines of horseshoe and Bechstein's bats and is anticipated to be able to accept a degree of development pressure provided applications are designed in accordance with the principles in the TWBMS. Impacts will arise on individual sites and in-combination with other sites as a result of loss and/degradation of habitat of importance to the qualifying bats. In order to conclude the AA favourably, applications impacting greenfield land and bat habitat are expected to provide a S106 contribution prior to commencement of ~~£972.03~~ **£1,000 per dwelling towards habitat mitigation detailed in Section 9.1 of the TWBMS (see [Fees set by Wiltshire Council 2026-27](#)).**

Works are proposed to areas of greenfield land (i.e., a residential garden that has not been developed nor occupied by a permanent structure, see [National Planning Policy Framework - Annex 2: Glossary - Guidance - GOV.UK](#)).

As required by the Conservation of Habitats and Species Regulations 2017 (as amended) an Appropriate Assessment must be carried out by the LPA, and in this case, against the TWBMS criteria (see below). Insufficient information has so far been submitted to enable the AA to be completed successfully, which must be completed and the conclusion agreed with Natural England prior to the application being determined. Please see the table below for details of the matters that need to be resolved **(issues are highlighted in red)**.

Ecology does not raise an objection in principle to the development of this site, and a proportionate approach to mitigation is likely to be acceptable. However, the proposals in their current form do not provide sufficient space to accommodate the level of mitigation necessary to demonstrate that the foraging and commuting functionality of the SAC bat population will be maintained.

APPROPRIATE ASSESSMENT FOR APPLICATIONS FALLING WITHIN THE YELLOW ZONE AND GREY ZONE OF The Trowbridge and Westbury Bat Mitigation Strategy

Item	TWBMS criteria	Details provided for Application
1	Did the application seek pre-application advice to establish the extent to which the TWBMS will drive layout and design of the development. Note this is not crucial to a favorable AA.	Pre application advice has not been sought.
	<u>Greenfield sites in Yellow Zone</u>	

2	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 •	The PEA states that the site contains modified grassland, introduced shrubs, hedgerow and mature trees. The existing bungalow has low suitability for use by roosting bats, and no bats were recorded using the building during an emergence survey conducted in August 2025. Calls of common pipistrelle and noctule bats were recorded. The surrounding land is dominated by a mosaic of arable and pasture fields with connected hedgerow and patches of woodland, therefore, it is likely that qualifying bat species (e.g., horseshoe or Bechstein's bats) use the application site to some extent for foraging and commuting. The PEA concludes that the garden, including the boundary hedgerow and mature trees, may not represent a significant resource but nonetheless is likely to be used by foraging and commuting bats. Targeted bat activity surveys have not been undertaken to support this conclusion. In the absence of survey evidence demonstrating otherwise, this AA is conducted under the assumption that qualifying bat species are using the site for foraging and commuting and therefore represents core bat habitat.
3	Masterplan to be provided which covers entire allocation or large application	This is a minor application and a masterplan is not required.
4	<u>Outline applications on green field sites in Yellow Zone</u> , Ecological Parameters Plan (para 161) to be provided	This is a full planning application and an EPP is not required.
5	<u>Greenfield Sites in the Yellow Zone.</u> Statutory Biodiversity Metric demonstrating no net loss. The calculation is supported by pre and post development maps. The post development maps align with other plans and drawings.	A Statutory Biodiversity Metric has been provided and predicts significant loss of - 80.17% in habitat units and -16.23% in hedgerow units. The updated metric predicts a loss of 56.06% in habitat units and 0.26% in hedgerow units. Development in the yellow zone is expected to mitigate for habitat loss <u>on site</u> (see paragraph 146 of the TWBMS). Whilst it is recognised that this is a minor development, this level of loss is generally not acceptable. Changes to the layout that seek to deliver less on-site loss

		would be welcomed. In particular, a wider buffer is required; there could be scope to include greater habitat improvements in the northern section of the site, for example.
6	<u>For reserved matters and full applications on green field sites in Yellow Zone</u>, an Ecological Mitigation Plan to be submitted containing (para 162): (i) Scaled drawing to show • Details of replacement roosts. • Core bat habitat (foraging and commuting) to be retained, created and enhanced. • Location/extent and full landscape specifications for tree and shrub planting, wildflower grassland etc. (iv) proposals are in accordance with the standards for habitat mitigation and management as described at section 8.2 and Figure 6 in the TWBMS. (v) Wide swathes of unlit bat habitat with associated buffer zones ensuring landscape permeable to commuting bats. (vi) Retained core bat habitat connects to the wider habitat network.	An Ecological Mitigation Plan (EMP) has been provided. The retention and enhancement of hedgerows within wildlife corridors and tree planting is welcomed, however, the proposals will result in the significant urbanisation of the Site and, as a result, the current provisions within a 3m buffer are considered insufficient to demonstrate the sites functionality to bats will not be adversely affected. The revised Ecology Mitigation Plan denotes a buffer that is “<i>generally min. 5m</i>” and “<i>improved and maintained by management company</i>”. However, using the provided scale bar, the buffer appears to fall below 5m at all points bar the northeast corner. At present, the buffer appears to be inadequate, because: • The current provision does not demonstrate bat foraging and commuting functionality will be maintained. - <i>not addressed</i> • The new dwellings will introduce light spill onto the site including the boundary hedgerow. - <i>not addressed</i> • A significant proportion of the proposed trees are positioned in close proximity to residential dwellings. This is likely to result in future conflict with homeowners, creating a high risk of pressure for pruning or removal. As a consequence, the long-term delivery of any intended ecological and amenity benefits from these trees is uncertain and cannot be relied upon. - <i>not addressed</i> • Proposed rear elevations (facing the northern hedgerow) of Plots 4 and 5 appear to include a considerable amount of glazing, increasing the

		potential light spill from internal fixtures. - not addressed (it is acknowledged that the Cover Letter states that the level of glazing has been significantly reduced, however, the elevation plans appear to remain unchanged) Plots 4-6 are located very close to the northern boundary, and human disturbance here would increase notably. - not addressed (the setting-back of Plot 5 is welcomed, though Plots 4 and 6 remain in very close proximity to the boundary features) Overall, the submitted Ecological Mitigation Plan does not sufficiently address this criterion of the TWBMS and the current proposals are considered likely to result in the loss of functionality of habitat potentially used by SAC bats. The TWBMS makes clear that core habitat features should be expanded to 15m (Zone A), and then further buffered from development (as a dark buffer) by 15m (Zone B). Whilst professional judgement may be exercised and it is understood that a full 30m buffer area is not practical given the size of the site, the proposals in their current form (with <5m buffer areas) still do not appear to provide sufficient space to accommodate an appropriate level of mitigation. An alternative option would be to focus on adding a reasonable and wider buffer at least at one of the boundaries (e.g., northern boundary). Further, at present, the practicalities of long-term management of the buffer areas are unclear, and they will be subject to light spill and impacts of increased urbanisation.
7	<u>Applications on green field sites in Yellow Zone.</u> Lighting Impact Assessment, including lux contour plots, in line with Section 8.3 of TWBMS.	It is not known whether any new external lighting will be installed. - not addressed. This information is required prior to determination, and to inform AA. If new external lighting is proposed, then a lighting plan will be required to demonstrate: Location, type, number, and

		specification of all external light sources • A lux contour plan covering internal and external light spill • Demonstration that roost entrances and commuting/foraging corridors will remain unlit (≤ 0.5 lux) The approach to lighting for new development, including lighting survey, should be undertaken in accordance with Guidance Note 08/23 Bats and Artificial Lighting at Night (Bat Conservation Trust and Institution of Lighting Professionals, 2023)
8	<u>Reserved Matters and Full applications on green field sites in Yellow Zone</u> CEMP to set out: • Location of temporary work areas. • Schedule of works covering removal, enhancement and creation of habitat features in relation to construction works. • Details of compliance arrangements and how staff will interface with Council TWBMS Project Officer. • Management of habitats during the construction phase.	A CEMP will be required by condition. The CEMP must include drawings and details that demonstrate how the retained (and enhanced) boundary habitats, including hedgerow, will be protected during the construction works.
9	Application to demonstrate measures to ensure core bat habitat will remain relatively undisturbed by the effects of urbanisation.	Not achieved.
10	<u>Reserved Matters and Full application on green field sites in Yellow Zone</u>, LEMP to set out: • Plan showing extent of habitats which the Management Company will be responsible for • Management objectives for each habitat • 1 and 5 year schedules of management activities including replacement /restoration works where damage occurs. • Review mechanism	This is a minor application and a LEMP would not be proportionate to the proposals.
12	The applicant agrees that a financial Strategic Habitat Mitigation Contribution (yellow medium risk bat sensitivity zone) of £1,000/ dwelling or £30,000 per hectare will be	For this greenfield residential application within the yellow zone, the cost of mitigation via the Council's strategic TWBMS would be £5,000 (£1,000 per new dwelling; in this case, there is a gain of 5 dwellings).

	secured by S106.	Thank you for confirming agreement; please note the amended fees as per Fees set by Wiltshire Council 2026-27 .
	<u>Grey hatched recreational pressure zone</u>	
13	New residential development proposals in the grey hatched medium recreational risk zone will be expected to contribute towards the council's strategic recreational pressure mitigation scheme or Deliver sufficient natural recreational focused space/ Suitable Alternative Natural Greenspace (SANG) [depending on the number of residential dwellings proposed]. Major developments (≥50 dwellings) must now <u>deliver Suitable Alternative Natural Greenspace (SANG) on site</u>	For this residential application within the grey zone, the cost of mitigation via the Council's strategic TWBMS would be £4,625 (£925 per new dwelling; in this case, there is a gain of 5 dwellings). Thank you for confirming agreement

Other protected and notable species

The site is generally of low suitability for use by reptiles and amphibians, with no known ponds within 500m. The site does provide habitats that could be used by nesting birds, badgers and hedgehogs. To ensure the risk posed to these taxa is minimised, precautionary measures (such as appropriate timings of works to avoid the bird nesting season, and/or pre-commencement checks) should be detailed within the CEMP, which must be secured via a planning condition.

Biodiversity Net Gain

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, map and habitat condition assessments ('*Statutory Biodiversity Metric, Jacob Richardson, October 2025*'; '*Biodiversity Net Gain Design Stage Report, All Ecology Ltd, October 2025*') have been submitted. However, the baseline habitat scores are not shown in the statutory metric spreadsheet (an error code appears), neither on the headline results tab nor the on-site habitat baseline tab. The applicant will need to provide an updated/repaid spreadsheet.

Additionally, the proposed hedgerow creation and enhancement (as per the Ecological Mitigation Plan) is not reflected in the metric.

Thank you for providing an updated metric (Statutory Biodiversity Metric, Jacob Richardson, March 2026).

The pre-development (baseline) situation is summarised below.

On-site pre-development (baseline) biodiversity value	2.43 Habitat units
	0.38 Hedgerow units
	0.00 Watercourse units
Are there any <u>irreplaceable</u> habitats on-site?	No
Has any habitat <u>degradation</u> of occurred?	No

Confirmation of how the development will achieve BNG is a post-determination matter, however, consideration should be given to how any proposed BNG will be secured. The submitted metric indicates that 1.6 habitat units and 0.04 hedgerow units are required to meet the 10% BNG requirement.

In principle, the submitted BNG information is sufficient. However, as per the TWBMS, development in the yellow zone is expected to mitigate for habitat loss on-site, “to be demonstrated by use of an established metric (preferably the Statutory Biodiversity Metric)” [Paragraph 146]. Therefore, as advised above, alterations to the plans are needed to ensure that no net loss – *or otherwise sufficient compensation* – can be delivered on-site.

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 the protected site (Bath and Bradford on Avon Bat SAC) and protected 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 all issues have been resolved.

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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