

## Wiltshire Council Planning Consultation Response

### ECOLOGY

|                            |                                                                                                                                                                                                                 |
|----------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Officer name:</b>       | Jessica Cracknell                                                                                                                                                                                               |
| <b>Date:</b>               | 15/05/2026                                                                                                                                                                                                      |
| <b>Application Number:</b> | PL/2026/00168                                                                                                                                                                                                   |
| <b>Proposal:</b>           | Change of use of Hazelbury Manor (Grade I listed), Dower House (Grade I listed) and The Granary (Grade II listed) from mixed used, residential (C3) and agricultural, to hotel use (C1) with ancillary parking. |
| <b>Site Address:</b>       | Hazelbury Manor, Bradford Road, Hawthorn, Corsham, SN13 8HX                                                                                                                                                     |
| <b>Case Officer:</b>       | Lucie Turner                                                                                                                                                                                                    |

### Recommendations:

|                                     |                                                |
|-------------------------------------|------------------------------------------------|
| <input type="checkbox"/>            | No Comment                                     |
| <input type="checkbox"/>            | Support                                        |
| <input type="checkbox"/>            | No objection                                   |
| <input type="checkbox"/>            | Condition (no objection subject to conditions) |
| <input checked="" type="checkbox"/> | Objection - further information required       |
| <input type="checkbox"/>            | Objection in principle                         |
| <input checked="" type="checkbox"/> | <b>HRA.</b>                                    |

### Further Information Required:

|   | Issue                       | Policy/Legislative Compliance                                                                                  | Date information requested & Further information required                                                                                                                  | Satisfactorily addressed (Document & Date submitted) |
|---|-----------------------------|----------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| 1 | Biodiversity Net Gain (BNG) | Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) | <b>15/05/2026</b><br>Submission of statutory metric calculation with the correct baseline habitats, redline boundary and associated plans and condition assessment sheets. | <b>NO</b>                                            |

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.

The following submitted documentation was reviewed to inform this response:

- Ecological Impact Assessment. 12 March 2026. BSG Ecology. Project No. P25-359;
- Biodiversity Net Gain Assessment. 12 March 2025. BSG Ecology. Project No. P25-359;
- The Statutory Biodiversity Metric. 09 January 2026;
- Figure 1: Baseline Habitats. 09 January 2026. BSG Ecology. Job Ref. P25-359. Version. 1.2;
- Figure 2: Proposed Habitats. 09 January 2026. BSG Ecology. Job Ref. P25-359. Version. 1.2;

- Statutory\_Biodiversity\_Metric\_Condition\_Assessments\_-\_July\_2025 – Hazelbury. 26 June 2025. 30 July 2025. 10 December 2025;
- Proposed Site Plan. 08 January 2026. Yiangou Architects. Drawing No. 2956-055. Rev. H;
- Proposed Granary Plans and Elevations. 15 December 2025. Yiangou Architects. Drawing No. 2956-2050. Rev. P8;
- Site Location Plan. 09 January 2026. Yiangou Architects. Drawing No. 2956-0010. Rev. P7;
- Existing Granary Plans and Elevations. 04 November 2025. Yiangou Architects. Drawing No. 2956-2000. Rev. P1;
- Planning Statement. January 2026. Rural Solutions.

Following communication with the case officer, it has been confirmed that this application relates solely to a change of use, with no internal or external alterations proposed as part of the development, despite the inclusion of documents referring to such works. This consultation response has therefore been based on the change of use of Hazelbury Manor, Bradford Road, Hawthorn, Corsham, SN13 8HX only. **Should any works be proposed that involve alterations to the buildings (internal or external) or affect habitats and species identified within the site, the Council's ecology team must be reconsulted.**

### **Bath and Bradford on Avon Bat Special Area of Conservation (SAC): Habitat Regulations Assessment (HRA)**

The application site is located within a consultation zone for Greater Horseshoe bats, Lesser Horseshoe bats and Bechstein's bats associated with the Bath and Bradford on Avon Bats Special Area of Conservation (SAC) 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.

The site lies within a sensitive core sustenance zone for Annex II bat species and supports habitats suitable for roosting, foraging, and commuting. Submitted plans and reports identify the presence of bat roosts within the on-site buildings, confirm use of the site by bats, and reference internal and external works, however, it has been clarified that the current proposal relates solely to a change of use. The assessment has therefore been undertaken on this basis. **Any future amendments to the proposals, particularly those involving works to buildings or habitats with potential to support Annex II bats, will require further ecological survey, a review of mitigation and management measures, and will be subject to reassessment under the Habitats Regulations.**

A test of likely significance has been carried out by the relevant Competent Authority (Wiltshire Council) as required by Regulation 63 Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. This concluded that, given the scale and nature of the proposal (change of use only, with no internal or external works as part of the proposal), there is no mechanism for adverse effect. The Habitat Regulation Assessment (HRA) has concluded that the application will not result in any mechanism for adverse effect on Annex II bats, or on the conservation objectives of the SAC and subsequently is screened out of Appropriate Assessment.

Any future proposals, works or applications for this site must provide sufficient information relating to direct and indirect impacts on bat species, including Annex II bats associated with the Bath and Bradford-on-Avon Bats SAC, assessment of both direct and indirect impacts, and any potential effects on Box Mine SSSI.

### **Box Mine SSSI**

The LPA have a duty to consult NE prior to determining a planning application that is in or likely to affect a SSSI (Schedule 4 (w) of The Town and Country Planning (Development Management Procedure) (England) Order 2015 and section 28i of The Wildlife and Countryside Act 1981).

This application lies within Box Mine Site of Special Scientific Interest (SSSI). Given the scale and nature of the proposed works, which comprises a change of use only with no internal or external alterations to the buildings and no works proposed adjacent or within the SSSI, it is concluded that there is no mechanism for potential effect.

Please note that the developer has a responsibility to protect the qualifying features of this site and must seek approval (assent) from Natural England prior to carrying out any works likely to damage the qualifying features of sites special scientific interest. Further advice can be found here: [Sites of special scientific interest: public body responsibilities - GOV.UK](#)

### **Priority Habitat Traditional Orchard**

Priority Habitat Traditional Orchard lies within the site. In accordance with Core Policy 50, development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term. Where it has been demonstrated that such features cannot be retained, removal or damage shall only be acceptable in circumstances where the anticipated ecological impacts have been mitigated as far as possible and appropriate compensatory measures can be secured to ensure no net loss of the local biodiversity resource.

### **Nesting Birds**

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 from March to August inclusive. All British birds, their nests and eggs are protected under Section 1 of the Wildlife and Countryside Act 1981 (as amended) and the Countryside and Rights of Way Act 2000 while birds are nesting, building nests and sitting on eggs. 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. Damage to extensive areas that could contain nests/breeding birds should be undertaken outside the breeding season. This season is usually taken to be the period between 1st March and 31st August but some species are known to breed outside these limits.

### **Reptiles**

A precautionary method of working must be undertaken including a sensitive (phased) vegetation clearance methodology between the months of April and October, carried out under the supervision of a suitably qualified ecologist. Reasonable avoidance measures have been proposed and are welcomed, this will be secured by 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 (09 January 2026) confirming the baseline and predicted post-development biodiversity units of the site has been submitted (including the condition assessment sheets and maps).

### **The following issues must be addressed in the baseline prior to determination:**

- The redline boundary within the Biodiversity Net Gain Assessment (12 March 2025. BSG Ecology. Project No. P25-359) and Figure 1: Baseline Habitats (09 January 2026. BSG Ecology. Job Ref. P25-359. Version. 1.2) used for the BNG assessment is different from the redline boundary shown on other documents such as the Site Location Plan (09 January 2026. Yiangou Architects. Drawing No. 2956-0010. Rev. P7). The redline application boundary and site boundary used for the BNG assessment must match within all provided documentation.
- The Biodiversity Net Gain Baseline Assessment identifies the grassland as *g3c Other Neutral Grassland*, however the evidence provided does not demonstrate compliance with the UKHab definition. This habitat type must meet at least three of four criteria. Further survey evidence is required to justify the classification of *other neutral grassland (g3c)*. The information presented suggests that the habitat is more characteristic of *modified grassland (g4)*.
- The classification of the area as “vegetated garden” may be acceptable where the land is demonstrably managed as amenity grounds associated with the built use. However, in this case it appears that the use of the *vegetated garden* classification has been applied extensively across the site. While some areas may reasonably fall within this category, the submitted baseline shows that this habitat type comprises the majority of the application site, which raises concerns regarding its

appropriateness. Sufficient evidence and justification must be provided to support the classification across all mapped areas.

**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 habitats 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: these will be added once the issues above have been addressed**

#### **INFORMATIVES:**

##### **Bat Roosts**

The roof space of Hazelbury Manor, Bradford Road, Hawthorn, Corsham, SN13 8HX is 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. Future conversion of the roof space to living accommodation or replacing the roof could also breach this legislation and advice should be obtained from a professional bat ecologist before proceeding with work of this nature.

##### **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 GN08/23 "Bats and artificial lighting at night", 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 | Date |
|-----------|------|
|           |      |