

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	05/03/2026, 24/03/2026 , 18/05/2026
Application number:	PL/2026/00028
Proposal:	Part demolition of existing buildings and erection of two self-build dwellings (use class C3) including parking, landscaping and associated works.
Site address:	Land adjacent 36, Bath Road, Bradford on Avon, BA15 1SR
Case officer:	Andrew Thomas

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)
a)	HRA assessment for bat SAC	Habitat Regulations, NPPF, Wiltshire CP50	05/03/2026 --A clear statement of any vegetation proposed for removal -Clarification of whether any lighting is proposed -Proposed mitigation, as relevant	24/04/2026 Yes Technical Note: Ecology Update Response, Crossman Acquisitions, March 2026

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 Survey for Bats, All Ecology, September 2025
- Design & Access Statement, Angus Meek Architects, January 2026
- Existing Site Plan, Angus Meek Architects, June 2025
- Site Plan Proposed, Angus Meek Architects, June 2025, [Revision F](#)
- [Technical Note: Ecology Update Response, Crossman Acquisitions, March 2026](#)

- Statutory Biodiversity Metric, Crossman Acquisitions, May 2026

The site comprises a plot of land adjacent to an existing dwelling. The site contains a number of buildings used for garaging and storage, as well as paddock at the rear. It is proposed to part-demolish the buildings and erect two dwellings.

Thank you for re-consulting Ecology; my second comments are shown in blue. My third comments are shown in red, following the submission of a BNG metric.

COMMENTS:

Bath & Bradford on Avon Bats Special Area of Conservation (SAC)

This site is located within multiple Lesser Horseshoe and Greater Horseshoe bat roost buffers associated with the Bath and Bradford-on-Avon SAC. The site's grassland area is linked to grassland and woodland in the wider landscape, potentially providing important foraging and commuting habitats. There are a number of historical records of Lesser Horseshoe bats roosting approximately 260-280m south of the site. 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.

In the absence of bat activity surveys, it is assumed that Annex II bats may be using the site and the surrounding areas. 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:

- Further details of the habitat to be lost; it is currently unclear if any hedgerow will be removed
- Confirmation of whether any new external lighting is proposed and, if so, what type/where
- Details of the mitigation proposed for the loss of potential bat foraging habitat. Whilst some green space is shown on the proposed site plan, it will be helpful to know what species are proposed (for, e.g., the hedgerows and sections of grassland fronting the new dwellings). The design and locations of bat roosting features would also be welcomed.

The submitted technical note clarifies that no hedgerow will be removed. The loss of a small area of species-poor grassland – at the edge of the site and bordered by hardstanding – will arguably have no impact on core foraging habitat. Further, the technical note states that no external lighting is proposed. No Annex II bat species were recorded during the emergence survey.

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 given the scale and nature of the currently proposed development which (i) involves no overall loss of a roost of a qualifying species, (ii) does not propose removal of any core bat habitat, and (iii) does not propose any additional external lighting, there is no mechanism for adverse impact on the Conservation Objectives of the SAC, and the proposal can be screened out of Appropriate Assessment.

Bat surveys

Overall, roosting opportunities on site are considered minimal, with many of the buildings comprising metal shed-like constructions, or being single-storey flat roof outbuildings/garages. A preliminary bat roost assessment found that three buildings (denoted in the Preliminary Ecological Appraisal as Buildings 1-3 and 7) had low bat roosting potential, with the remaining buildings not possessing any suitable features. As such, a single dusk emergence survey was undertaken in July 2025 in accordance with best practice guidelines. No bats were recorded emerging from any building. A low number of foraging passes of Common Pipistrelle, Serotine and Noctule bats were recorded.

The bat survey report recommends a number of suitable precautionary working measures as well as lighting requirements, and potential enhancements for bats. Enhancements for bats – such as integrated bat boxes or similar – would be in line with the NPPF and with CP50, which indicate that applications must ensure that gains for biodiversity, relevant to local habitats and wildlife populations, should form part of the proposed development. Biodiversity enhancements should therefore be secured via a condition.

The grassland/paddock to the rear of the site is described as “poor semi-improved grassland” that does not appear to be regularly managed, and with a species-poor sward. The grassland will be lost to accommodate the development. There is a hedge along part of the northern boundary that may or may not be retained (it is unclear on plans), though will form part of the boundary of Plot 1 and will be subject to increased levels of human disturbance and potentially light spill. These habitats connect to good bat foraging and commuting habitat in the wider landscape, with grassland areas to the south, west and north, interspersed with lines of trees and hedgerow. Therefore, considering potential disturbance impacts on foraging and commuting bats, as above, confirmation of habitat mitigation and lighting plans is required.

As above, it has been confirmed that no new lighting is proposed. The minor loss of an area of species-poor grassland will be compensated for via the creation of 41m of new hedgerow and vegetated garden. The existing hedgerow is to be retained.

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 (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.

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 it is for self and Custom Build Development, meaning development which:

- consists of no more than 9 dwellings;
- is carried out on a site which has an area no larger than 0.5 hectares; and
- consists exclusively of dwellings which are self-build or custom housebuilding (as defined in section 1(A1) of the Self-build and Custom Housebuilding Act 2015)

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.

It has been determined that self-build status will not apply and, as such, the application is not exempt from BNG, and a BNG metric has been submitted. The baseline habitats comprise artificial surfaces, poor-condition modified grassland and hedgerow, as summarised below:

On-site pre-development (baseline) biodiversity value	0.10 Habitat units
	0.04 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

A habitats map has not been submitted. However, the metric was reviewed against the Preliminary Ecological Appraisal and updated ecology technical note, and the recorded habitat types align with that included in the baseline. The baseline is therefore accepted as accurate.

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 metric proposes a gain in units through hedgerow and grassland, but the applicant should note that the grassland may need to be entered as “vegetated garden”, given it will be primarily contained within a private residential garden where BNG cannot be monitored.

CONDITIONS:

1. Compliance with submitted documents

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

- Section 6.6 to 6.10 (Mitigation) of ‘Dusk Emergence Survey for Bats, All Ecology, September 2025’
- Technical Note: Ecology Update Response, Crossman Acquisitions, March 2026

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

2. Enhancements for Biodiversity

Prior to the commencement of any works, including vegetation removal and demolition, details of the number, design and locations of ecological enhancements – including the type and locations of bat roosting opportunities, and other enhancements for wildlife – shall be submitted to the local authority for approval. The approved details shall be implemented before occupation of the final works.

REASON: To provide mitigation/enhancement for biodiversity.

Informative – Artificial Lighting

The habitat within 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 18/05/2026
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