

Objection (Ecology and Procedural Grounds) – Planning Application PL/2026/00390

I wish to object to this application on ecological grounds, with particular reference to Wiltshire Council's duties as the competent authority under the Conservation of Habitats and Species Regulations 2017 (as amended), and relevant policies within the Wiltshire Core Strategy.

1. Timing of ecological consultation response

I note that the Ecology Officer's response is dated **12 March 2026**, shortly after the public consultation deadline of **11 March 2026**.

Given that this response includes a Habitats Regulations screening assessment and conclusions regarding potential impacts on the Bath and Bradford-on-Avon Bats SAC, it would be helpful to ensure that interested parties have had a reasonable opportunity to consider and comment on this information.

I would therefore respectfully request that this is taken into account in the determination process, and that, if necessary, additional time is allowed for representations on this material.

2. Conflict with Core Strategy Policy CP50 (Biodiversity and Geodiversity)

Core Policy **CP50** requires that development:

- protects, maintains and enhances biodiversity; and
- ensures that there is **no adverse effect on the integrity of European sites**, including SACs.

The application site lies within the zone of influence of the **Bath and Bradford-on-Avon Bats SAC**, with confirmed roosts in very close proximity.

The current screening conclusion—that there is no likely significant effect—is not supported by sufficient evidence, particularly given:

- the intensification of use from a dwelling to a 5-bedroom HMO;
- increased night-time activity; and
- proximity to known roosts.

In the absence of robust evidence demonstrating no adverse effect, the proposal appears to conflict with CP50 and the requirements of the Habitats Regulations.

3. Conflict with Core Strategy Policy CP51 (Landscape)

Core Policy **CP51** seeks to protect and conserve landscape character, including features that contribute to ecological networks and habitat connectivity.

Bats associated with the SAC rely on dark corridors and sensitive foraging routes. The potential for increased disturbance and lighting associated with intensified residential use has not been fully assessed.

Without sufficient information, it cannot be concluded that the proposal would conserve the ecological function of the surrounding landscape, contrary to CP51.

4. Habitats Regulations – insufficient basis for screening out Appropriate Assessment

Wiltshire Council, as competent authority, must apply the **precautionary principle** under Regulation 63.

The conclusion to screen out Appropriate Assessment is based on:

- no physical alterations; and
- a minimal increase in bedrooms.

However, this does not fully consider the **intensification of use** and associated disturbance. There is no clear evidence to demonstrate, beyond reasonable scientific doubt, that the proposal will not affect the qualifying features of the SAC.

As such, it is not evident that the screening conclusion is sufficiently robust.

5. Lighting impacts – reliance on condition

The Ecology Officer recommends a lighting condition but does not assess likely lighting impacts at application stage.

Given the known sensitivity of horseshoe bats to artificial lighting, and Wiltshire Council's emphasis on protecting bat habitats, it would be preferable for this issue to be **fully assessed upfront**, rather than addressed solely by condition.

6. Lack of ecological survey information

No ecological surveys have been submitted.

Core Policy **CP50** and Wiltshire Council guidance require that applications are supported by **sufficient ecological information** to allow proper assessment.

In the absence of survey data, it is difficult to be certain that there will be no adverse effects on protected species or the SAC.

7. Biodiversity Net Gain – need for verification

The Ecology response suggests the proposal falls below the de minimis threshold for mandatory Biodiversity Net Gain.

However, this should be clearly evidenced to ensure compliance with:

- **CP50**, and
- statutory BNG requirements under the Environment Act 2021.

8. Conclusion

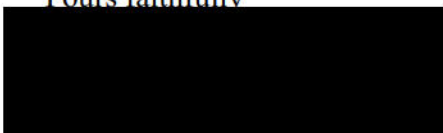
In summary:

- There are concerns regarding the timing of the Ecology Officer's response and the opportunity for public comment;
- The proposal raises potential conflict with **Core Policies CP50 and CP51**; and
- The Habitats Regulations screening is not supported by sufficient evidence.

Wiltshire Council must be satisfied that the proposal will not adversely affect the integrity of the Bath and Bradford-on-Avon Bats SAC before granting permission.

I therefore request that these matters are carefully considered, and that further ecological information is provided if necessary prior to determination.

Yours faithfully

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