

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	20/05/2026
Application number:	PL/2026/00531
Proposal:	Outline planning application for development of 9no self build dwellings. All matters reserved except for Access and Layout.
Site address:	Land to the East of Yarnbrook Road, West Ashton, Trowbridge, BA14 6AP
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)
a)	Bats and protected sites (Bath and Bradford on Avon Bat SAC, TWBMS)	Habitat Regulations, CP50, NPPF	20/05/2026 -Information required for AA (see table below)	
b)	Ecological Parameters Plan	Wiltshire CP50; NPPF	20/05/2026 -Provision of an Ecological Parameters Plan (EPP)	
c)	GCN	Habitat Regulations, CP50, NPPF	20/05/2026 -Clarification of suitability of Pond 1, and survey attempts/evidence of unsuitability	

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:

- Design and Access Statement, Millen, January 2026
- Preliminary Ecological Appraisal, Arborweald, November 2025

- Site Layout/Location Plan, Millen, June 2025
- Site Context Plan, Millen, June 2025

The site comprises two fields and a gravel track, with a field shelter, scrub and hedgerow. It is proposed to construct up to 9 dwellings.

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 January 2026 Natural England (NE) confirmed that the 2026 strategic AA for Salisbury Plain SPA continues to be supported by NE.

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), 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. This is required prior to commencement of development and must be secured via section 106 agreement (s106), a section 111 (s111) agreement or unilateral undertaking (UU) (legal fees will apply).

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 (such as the present application) are expected to provide a S106 contribution prior to commencement of £1,000 per dwelling (index linked from 2018) towards habitat mitigation detailed in Section 9.1 of the TWBMS.

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).

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 ecology report states that the site contains grassland, scrub, hedgerow and a building. There are no potential roosting opportunities on-site. The ecology report states “<i>the site provides limited opportunities for foraging and commuting bats</i>”, though later considers the likelihood of presence as “<i>moderate</i>”. No bat activity surveys have been undertaken. However, the surrounding land is dominated by a mosaic of arable and pasture fields with connected hedgerow and patches of woodland. The site was previously grazed, and also possesses linear features that may be of some value to commuting bats. <u>There are multiple records of Bechstein’s bat roosts 130m southwest, 200m southwest (maternity roost), and 400m northeast, and a Greater Horseshoe roost 260m northeast.</u> These records are not considered within the ecology report. In the absence of any bat survey data, it is considered that qualifying bat SAC species are likely using the application site to some extent for foraging and commuting.
3	Masterplan to be provided which covers entire allocation or large application	A masterplan is not considered necessary, but an EPP should be submitted (please see the point below).
4	<u>Outline applications on green field sites in Yellow Zone</u> , Ecological	An Ecological Parameters Plan (EPP) has not been provided. The EPP must clearly identify

	Parameters Plan (para 161) to be provided	those areas of the site which are unconstrained, those areas where sensitive design or restrictions may be required (i.e., core habitat features), and any areas of the site which are to be retained, remain undeveloped, or be enhanced.
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 not been submitted, as this application may be exempt from mandatory BNG. Nonetheless, habitat mitigation has not been sufficiently demonstrated in the plans (it is not clear what habitats will be lost, created, enhanced, etc.). Development in the yellow zone is expected to mitigate for habitat loss <u>on site</u> (see paragraph 146 of the TWBMS).
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 has not been provided. The layout plan implies the retention of the scrub border at the southwest boundary, which is welcomed. However, plans for the remaining scrub and hedgerow are unclear. At present, the habitat retention appears to be inadequate, because: • The proposals will result in the significant urbanisation of the site, and the retention of the scrub at the southwest is considered insufficient to demonstrate the site's functionality to bats will not be adversely affected. • It is not clear how the scrub will be managed/secured away from the residential properties • There are no habitat buffers provided on any other boundary. 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). • The new dwellings will introduce light spill onto the site, including the boundary vegetation Overall, the proposed site 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.
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. 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.
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	Insufficient details of habitat mitigation (i.e., management, retention, enhancement and creation) have been provided. Whilst a LEMP will be required by condition, some level of detail is required at this stage to inform the AA.

	replacement /restoration works where damage occurs. • Review mechanism	
12	The applicant agrees that a financial Strategic Habitat Mitigation Contribution (yellow medium risk bat sensitivity zone) of £1,000 per dwelling or £30,000 per hectare will be secured by S106.	For this greenfield residential application within the yellow zone, the cost of mitigation via the Council's strategic TWBMS would be £9,000 (£1,000 per new dwelling; in this case, there is a gain of up to 9 dwellings). The applicant should confirm agreement with this.
	<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 £8,325 (£925 per new dwelling; in this case, there is a gain of up to 9 dwellings). The applicant should confirm agreement with this.

Ecological Parameters Plan

An Ecological Parameters Plan (EPP) is required to ensure required ecological features are integrated into the development. The EPP must clearly identify those areas of the site which are unconstrained, those areas where sensitive design or restrictions may be required, and any areas of the site which are to be retained, remain undeveloped, enhanced, form part of the landscaping for the purposes of protecting and enhancing biodiversity and any areas to be used as compensatory habitat in line with the submitted ecology documents, including the Biodiversity Net Gain Calculator spreadsheet. The EPP will become an 'approved document' of any outline permission granted and any reserved matters application must be in compliance with the plan.

The EPP must include:

1. A scaled drawing showing existing ecological features, distinguishing between those to be retained and those which will be lost e.g. hedgerows, trees, scrub, etc.
2. The buffer distance from light sensitive ecological features where the increase in lux levels will be zero or, if lux contours have been modelled, show contour lines for 1, 0.5 or 0.1 lux depending on the sensitivity of ecological features
3. Identify where habitat creation and enhancement will be incorporated on-site, denoting habitat types and including SuDS

Protected species

Reptiles and Great Crested Newts (GCN)

GCN are known to occur in the wider landscape, and the site may contain habitats suitable for use by GCN during their terrestrial phase (scrub and hedgerow). There is a large pond approximately 100m northwest of the site. The ecology report states that this pond has not been present for the last five years, based on historic aerial imagery. It is not clear how this conclusion was drawn, as recent aerial imagery still shows the shape and structure of a pond – further information is required.

Dependent on the above, the precautionary mitigation outlined in the report may be sufficient. In any case, **a Construction Environment Management Plan (CEMP) will need to be secured via planning condition**, to include full details of mitigation for reptiles and amphibians.

Appropriate enhancements, such as hibernacula, should be incorporated into the scheme, given that slow worm have been recorded locally.

Breeding 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.

There are records of kestrel and barn owl within 290m of the site. Provisions for breeding birds, such as kestrel nest boxes, would be welcomed, and should be considered within an enhancement scheme (see below).

Other species

No evidence of badgers or dormice was observed, and given the site's location abutting existing residential development, the site is not considered to be connected to areas of dormice habitat to the north or west. There may be some habitats within the wider landscape suitable of supporting dormice. As such, precautions for these species should be included within the CEMP.

Enhancements

In line with the NPPF and with CP50, applications must ensure that no net loss of functional habitat for the benefit of wildlife in the local area will occur as a result of the proposed development. Further, gains for biodiversity, relevant to local habitats and wildlife populations, should form part of the proposed development. **Enhancements should be secured via a planning condition.** The ecology report's recommendations of nest boxes, bee bricks and mammal gaps are welcomed, though the scheme should also include areas of habitat improvements (ensuring no net loss).

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), as indicated in the application form.

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.

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 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: wording to be provided once above issues addressed.

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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