

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	2/05/2026
Application number:	PL/2026/02097
Proposal:	Redevelopment of ancillary barn and function building, together with works to the public house, to provide spa and gym facilities in association with the pub's enhanced attraction.
Site address:	The Holford Arms, Knockdown, Tetbury, GL8 8QY
Case officer:	James Webster

Recommendations:

☐	No Comment
☐	Support
☐	No objection
☐	Condition (no objection subject to conditions)
☒	Objection - further information required
☐	Objection in principle
☐	HRA completed

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date)
1	Bats	Conservation of Habitats and Species Regulations 2017 Wiltshire Core Policy 50	21/05/2026 Bat mitigation shown on separate, enforceable plans	

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:

- Planning Statement, LPC, March 2026
- Existing Site Plan, Verity & Beverley, January 2026
- Pub Garden, Sarah Henderson, December 2025
- Spa Garden, Sarah Henderson, December 2025
- Barn Elevations As Proposed, 1-2, Verity & Beverley, October 2025
- Preliminary Ecological Appraisal, Herdwick Ecology, October 2025

- Biodiversity Net Gain Report, Herdwick Ecology, October 2025
- Statutory Biodiversity Metric, Cari Griffiths, March 2026

The site comprises a public house and outbuildings where it is proposed to convert a barn into a spa facility, involving an extension and landscaping. The site is bordered by a large commercial building to the southwest, green spaces with trees to the northeast and southeast, and a grassland field to the northwest. Works to the site (to provide function space/renovation) were also previously approved under 19/03888/FUL.

COMMENTS:

Protected species and habitats

The site contains buildings, lawn and ornamental garden plantings, including shrubs and fruit trees. The site is therefore of limited value to wildlife such as badgers, amphibians and reptiles, and no evidence of such taxa was noted.

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. Structures or vegetation capable of supporting breeding birds should be checked prior to commencement, and any removal or altering of such features should be delayed until after young birds have fledged.

A preliminary roost assessment of the barn was undertaken in 2017 and 2019, alongside bat activity surveys. Low numbers of Lesser Horseshoe and Brown Long-eared bats were recorded using the west side of the building for night roosting. In 2025, a small number of droppings was observed adjacent to the open barn door, again on the west site of the building. DNA analysis confirmed them to be from Brandt's bats. The building is considered largely unsuitable for use by day-roosting bats as it is open to the elements and disturbed regularly. As such, it is reasonably concluded that the barn has been used as a night roost by Lesser Horseshoe, Brown Long-eared, and Brandt's bats.

Under the Conservation of Species and Habitat Regulations 2017, 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 mitigation licence will be required before any work is undertaken to implement this planning permission.

The preliminary ecological appraisal recommends the adaptation of mitigation previously agreed for (19/03888/FUL), as set out in sections 5.8-5.13. The mitigation strategy includes a dedicated roosting area on the western elevation of the barn, allowing direct flight access into the roof void, as well as the provision of a bat box, toolbox talk and sensitive lighting design. Compliance with these recommendations should be secured via condition/s. However, the replacement roost, as shown in Appendix 2 of the report, is not shown on the submitted plans. **Please could these plans be submitted as separate, enforceable documents, that can then be secured via a condition?**

Biodiversity enhancements

In line with the NPPF and with CP50, applications must ensure that gains for biodiversity, relevant to local habitats and wildlife populations, should form part of the proposed development. The ecology report's suggestions of bird boxes and features for invertebrates and other wildlife are welcomed. **Biodiversity enhancements should be secured via a 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 and map ('*Biodiversity Net Gain Report, Herdwick Ecology, October 2025; Statutory Biodiversity Metric, Cari Griffiths, March 2026*') confirming the baseline and predicted post-development biodiversity units of the site have been submitted.

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

On-site pre-development (baseline) biodiversity value	0.98 Habitat units
	0.00 Hedgerow units
	0.00 Watercourse units
Are there any irreplaceable habitats on-site?	No
Has any habitat degradation 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. It is proposed to achieve a net gain by enhancing a grassland verge and incorporating new trees and shrubs.

IN SUMMARY: Whilst there is no objection to the principle of the proposal, the information outlined above (plans showing integrated roost features) must be submitted and reviewed by the LPA's ecology team prior to determination of the application.

DRAFT CONDITIONS:

1. Compliance with submitted documents

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

- Section 5 of the Preliminary Ecological Appraisal, Herdwick Ecology, October 2025
- Biodiversity Net Gain Report, Herdwick Ecology, October 2025
- Bat roost provisions as shown on elevation plans "xxx"

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

2. Lighting

No external light fixture or fitting will be installed within the application site unless details of existing and proposed new lighting have been submitted to and approved by the Local Planning Authority in writing. The submitted details will demonstrate how the proposed lighting will impact on bat habitat compared to the existing situation. The plans will be in accordance with the appropriate Environmental Zone standards set out by the Institution of Lighting Professionals (ILP) Guidance Notes on the Avoidance of Obtrusive Light (GN 01/2021) and Guidance note GN08/23 "Bats and artificial lighting at night", issued by the Bat Conservation Trust and Institution of Lighting Professionals.

REASON: To avoid illumination of habitat used by bats and other wildlife.

3. 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 – such as bat and bird boxes – 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 – bats

The barn at Holford Arms is used as a night 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 mitigation licence will be required before any work is undertaken to implement this planning permission. Future works to the building could also breach this legislation and advice should be obtained from a professional bat ecologist before proceeding with work of this nature.

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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