

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	21/05/2026
Application number:	PL/2026/02191
Proposal:	Proposed extension and associated internal alterations to family dwelling. Proposed demolition of existing garage and extension of roof of existing outbuilding to form open sided car port.
Site address:	22 Woods Hill, Limpley Stoke, Bath, BA2 7GA
Case officer:	Andrew Thomas

Recommendations:

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

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 Roost Assessment, Abricon, October 2025
- Bat Survey Report, Abricon, October 2025
- Design and Access Statement, Molehill Design, March 2026
- Site Plan – As Existing, Molehill Design, April 2024
- Site Plan – As Proposed, Molehill Design, April 2024

The site comprises a detached property proposed for extension and internal alterations.

COMMENTS:

Bath and Bradford-on-Avon Bats Special Area for Conservation (SAC)

The site is located within multiple core roost buffers for Bechstein's, Lesser Horseshoe and Greater Horseshoe bats, associated with the Bath and Bradford-on-Avon SAC. The current proposal therefore has potential to result in significant adverse impact on the special features of the Bath and Bradford-on-Avon SAC.

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 will not result in the loss of an Annex II bat roost nor foraging or commuting habitat), there is no mechanism for adverse impact on the Conservation Objectives of the SAC, and the proposal can be screened out of Appropriate Assessment.

Protected species

Bats

During a preliminary roost assessment (March 2025), ~60 droppings were noted in the loft (later confirmed via DNA analysis as belonging to Serotine bats). The building possesses several suitable bat roosting features, including gaps under tiles, soffits and boarding. Two emergence surveys were subsequently conducted in July and August 2025, recording a peak count of three serotines emerging from the main loft space.

Roost characterisation surveys (see [Bat Survey Guidelines](#)) should be carried out until sufficient information has been gathered, which typically may necessitate more than two surveys. In this case, it is accepted that further survey is not likely to reveal any additional information, given the results methodology, and lack of further roosting opportunities.

The works will not directly impact the loft space, and therefore, the roost will not be lost. However, there is a risk that it will be disturbed. 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.

Nesting birds

Evidence of a bird nest was noted under the decking adjacent to the dwelling. 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. The precautions detailed in Section 5.3 of the bat survey report should be adhered to, as per a document compliance condition.

Ecological 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. Details of ecological enhancements – including full details of the bat survey report's recommended bat box, bird box, insect house and hedgehog nest box – should be provided and implemented, to be secured via a condition.

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 development which is subject of a householder application within the meaning of article 2(1) of the Town and Country Planning (Development Management Procedure) (England) Order 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.

CONDITIONS:

1. Compliance with submitted documents

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

- Bat Survey Report, Abricon, October 2025

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, bird boxes and invertebrate blocks or similar – 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 house at 22 Woods Hill 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 mitigation licence will be required before any work is undertaken to implement this planning permission. Future conversion of the roof space 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.

Informative – 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 GN08-18 "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 21/05/2026
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