

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jessica Cracknell
Date:	28/05/2026
Application Number:	PL/2026/00089
Proposal:	External works to the church and hall comprising the installation of a photovoltaic array with associated battery storage, new access ramp and handrails to the main church entrance, reconfiguration of a ground floor window and entrance door to the south-east elevation of the hall, infilling of a redundant boiler room door, removal of redundant mechanical services and installation of new ductwork and terminals, together with the provision of Sheffield cycle stands, protective bollards and associated planting.
Site Address:	United Reformed Church, The Street, Holt, BA14 6RS
Case Officer:	Angela Ellis

Recommendations:

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

Thank you for your consultation on the above application. I have reviewed the submitted documents against OS maps, aerial photographs of the site and surrounding area, together with GIS layers of statutory and non-statutory designated sites and existing records of protected species.

The following submitted documentation was reviewed to inform this response:

- Bat & Bird Survey and Assessment. 15 October 2024. Alder Ecology UK Ltd;
- Proposed Site Plan. 06 May 2026. O'LearyGoss Architects. Drawing No. 3343_PA_105_A;
- Proposed Church Southwest Elevation. 06 May 2026. O'LearyGoss Architects. Drawing No. 3343_PA_170_A;
- Proposed Church Southeast Elevation. 15 January 2026. O'LearyGoss Architects. Drawing No. 3343_PA_169_A;
- Proposed Church Northwest Elevation. 22 December 2025. O'LearyGoss Architects. Drawing No. 3343_PA_167_;
- Proposed Church Northeast Elevation. 22 December 2025. O'LearyGoss Architects. Drawing No. 3343_PA_168_;
- Proposed Hall Elevations. 22 December 2025. O'LearyGoss Architects. Drawing No. 3343_PA_166_;
- Existing Site Plan. 22 December 2025. O'LearyGoss Architects. Drawing No. 3343_PA_104_;
- Existing Church Southeast Elevation. 22 December 2025. O'LearyGoss Architects. Drawing No. 3343_PA_128_;
- Existing Church Southwest Elevation. 22 December 2025. O'LearyGoss Architects. Drawing No. 3343_PA_129_;
- Existing Church Northeast Elevation. 22 December 2025. O'LearyGoss Architects. Drawing No. 3343_PA_127_;
- Existing Church Northwest Elevation. 22 December 2025. O'LearyGoss Architects. Drawing No. 3343_PA_126_;

- Existing Hall Elevations. 22 December 2025. O’LearyGoss Architects. Drawing No. 3343_PA_125_;
- Design & Access and Heritage Statement [Rev. A]. February 2026. O’LearyGoss Architects. 3343_URC Holt.

The proposed site does not lie within or adjacent to any sites designated for conservation and there are no areas of significant ecological importance within a zone of influence, it is expected that any adverse impacts on protected species or habitats could be suitably mitigated through an appropriate design scheme and timing of works.

Bat Species

Alder Ecology UK Ltd undertook a Preliminary Internal Assessment of the buildings, which identified evidence of bat use within the church. Three dusk emergence surveys of the buildings were carried out which identified a number of potential roosting and access features, along with evidence of recent bat activity, confirming that the church building functions as a confirmed day roost supporting low numbers of brown long-eared bats. The Bat & Bird Survey and Assessment concludes that the proposed internal renovation works will not impact roosting bats, as no works are planned within the area of the church that supports the roost. However, should access to this area be required at any stage, a pre-works inspection and supervision by a Licensed Bat Ecologist will be necessary. As a precautionary approach, works should be undertaken in accordance with a construction method statement to avoid impacts on bats. This should include appropriate mitigation measures, such as the installation of bat boxes, secured by planning condition. Should the proposals be amended in future, particularly where works may affect the roost area, further survey work and a review of mitigation and management measures would be required.

The roof space of United Reformed Church, The Street, Holt, BA14 6RS is used as a bat roost. Under the Conservation of Habitat Regulations, 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 Natural England licence may be required if any works are to affect the identified roosts before any work is undertaken to implement this planning permission.

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 GN08/23 “Bats and artificial lighting at night”, issued by the Bat Conservation Trust and Institution of Lighting Professionals. Suitable lighting to ensure dark foraging and commuting routes can be retained could be secured via condition.

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 from March to August inclusive. All British birds, their nests and eggs are protected under Section 1 of the Wildlife and Countryside Act 1981 (as amended) and the Countryside and Rights of Way Act 2000 while birds are nesting, building nests and sitting on eggs. 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. Damage to extensive areas that could contain nests/breeding birds should be undertaken outside the breeding season. This season is usually taken to be the period between 1st March and 31st August but some species are known to breed outside these limits.

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 the development meets the following criteria and is therefore below the de minimis threshold, meaning the development:

- does not impact an onsite priority habitat (a habitat specified in a list published under section 41 of the Natural Environment and Rural Communities Act 2006); and
- impacts less than 25 square metres of onsite habitat that has biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat (as defined in the statutory metric).

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.

Core Policy 50

Core Policy 50 of the Wiltshire Core Strategy requires all development to demonstrate no net loss of biodiversity and to seek opportunities to enhance biodiversity. The NPPF also encourages applications to deliver measurable net gains (para 186 d). It is anticipated that all developments will deliver no net loss of biodiversity. For this application, biodiversity measures should focus on delivering continued ecological functionality for birds, bats and hedgehogs.

The Bat & Bird Survey and Assessment proposes the inclusion of bat boxes. All details on exact locations and specifications must be added to all working plans (see condition below) and will become an enforceable part of the planning permission to avoid oversight and to ensure consistency and enforceability. Integrated features are generally maintenance-free and seek to benefit a target species/s or group/s and should demonstrate viability in terms of position on the building, location and clustering in accordance with relevant guidance and the additional features.

CONDITIONS:

1. Compliance with submitted documents

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

- Bat & Bird Survey and Assessment. 15 October 2024. Alder Ecology UK Ltd.

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

2. Construction Method Statement

No development shall commence on site (including any vegetation removal or works to existing structures), until a Construction Method Statement has been submitted to, and approved in writing by the Local Planning Authority. The Construction Method Statement shall include all precautionary measures to be implemented during the construction period, for the protection of sensitive habitats and species known to be present within or adjacent the site, with particular reference to bats and known bat roosts.

The development shall be carried out in strict accordance with the approved Construction Method Statement.

REASON: To ensure adequate protection, mitigation and compensation for protected species and priority habitats throughout the construction period.

3. Ecological Enhancements

Prior to the commencement of any works, including vegetation removal and demolition, details of the number, design and locations of ecological enhancement features including bat boxes and bird boxes shall be submitted to the Local Authority for approval. The approved details shall be implemented for the lifetime of the development and before completion of the final works.

REASON: To provide mitigation /enhancement for biodiversity.

4. 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.

INFORMATIVES:

Bat Species

The roof space of United Reformed Church, The Street, Holt, BA14 6RS 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 European Protected Species Licence will be required before any work is undertaken to implement this planning permission. Future conversion of the roof space to living accommodation 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.

Final sign off – all matters addressed:

Ecologist	Date
Jessica Cracknell	28/05/2026