

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name: Mary Holmes MCIEEM

Date: 16/06/2026

Application No: PL/2026/01921

Proposal: Proposed Replacement Outbuilding & Timber Fencing

Site Address: Framfield, Church Lane, Trowbridge, BA14 0EH

Case Officer: Steven Vellance

Recommendations:

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

Further Information Required

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date)
1.	Bats	Habitat Regulations/TWBMS	16/06/2026. PRA to be undertaken by a 'competent bat ecologist.' Further bat activity (emergence) surveys likely Further detail below	NO
2.	Bats	Habitat Regulations/TWBMS	16/06/2026. Confirmation on whether there will be any 'any' habitat removal.	NO

The outstanding document(s) listed above are needed to enable the council's ecology team to consider all the 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: Any changes to the documents previously submitted must be highlighted, otherwise they will not be considered.**

Matters Considered:

Thank you for consulting me on the above application in relation to ecology. I have reviewed the relevant submitted information as listed below and looked at the scheme against various mapping (OS and aerial) of the surrounding areas together with a review of designated sites and existing records of protected/notable species.

Preliminary Bat Roost Assessment (Harlow & Son Planning & Building Consultants, May 2026).
Existing & Proposed Site Plan. Drwg. No. AH2026/30. (A Harlow & Son, 18th March 2026).

Trowbridge & Westbury Bat Mitigation Strategy (TWBMS)

The application site is located within the yellow medium risk zone and grey hatched recreational zone of the Trowbridge & Westbury Bat Mitigation Strategy (TWBMS). The application must therefore be considered under the Habitats Regulations. The yellow medium risk zone represents the areas where habitat has been shown to be of importance, or is highly likely to be of importance for bats associated with the Bath and Bradford-on-Avon Bats SAC, and in particular the yellow zone takes into consideration the foraging areas and flightlines of horseshoe species 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 TBMS. 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.

The grey hatched recreational zone represents the areas where new residential development is expected to result in increased recreational pressure on key woodland bat sites.

As this is not an application for a residential dwelling there will be no payment for the grey hatched zone.

In terms of the yellow zone, the agent/applicant must confirm what habitat (if any) will be removed under these proposals.

Submitted report: Preliminary Bat Roost Assessment (Harlow & Son Planning & Building Consultants, May 2026).

A Preliminary Bat Roost Assessment has been submitted in support of this application however this contains insufficient information to determine potential impacts on bats for the following reasons:

- It appears the Preliminary Roost Assessment (PRA) survey was undertaken by a Planning Building Consultant and not a competent ecologist.

The report states that the survey has been undertaken in accordance with the BCT Guidelines (2023). The BCT Guidelines states that a PRA should be undertaken by an ecologist with the appropriate level of competence. In addition, some of the gaps and cracks in this building should be checked using an endoscope, as this would likely provide a valuable oversight into whether the building may be being used by roosting bats/and or the potential of the building to support roosting bats. In this case a licensed bat worker must undertake the survey. As the building is located within the TWBMS yellow zone close to the Lambrook Stream which is likely to be used by horseshoe bats and potentially Bechstein's bats, this increases the likelihood of the structure being used by roosting bats.

- The conclusions made by the Planning & Building consultant for a building with low potential are incorrect. A building classed as having low potential would require a minimum of one additional emergence survey.

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.

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 application 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.

Final sign off – all matters addressed:

Ecologist	Date