

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Rachel Whyte; Mary Holmes
Date:	29/04/2025; 30/06/2025; Final Comments 17/07/2025; 31/07/2025 Comments added following adoption of the Trowbridge and Westbury Bat Mitigation Strategy. 22/06/2026
Application number:	PL/2025/02846; PL/2026/02779 (S73)
Proposal:	Demolition of The Old Vicarage with replacement building and extension to Staverton House, providing 13 Bedrooms on Lower Ground Floor, 12 Bedrooms on Ground Floor, all with auxiliary space & together with the Existing Care Home would provide 46 bedrooms total and associated works. Variation of conditions 2 (approved plans) and 3 (ecology) on PL/2025/02846 -Demolition of The Old Vicarage with replacement building and extension to Staverton House, providing 13 Bedrooms on Lower Ground Floor, 12 Bedrooms on Ground Floor, all with auxiliary space & together with the Existing Care Home would provide 46 bedrooms total and associated works.
Site address:	Staverton House, 51A, Staverton, Trowbridge, BA14 6NX
Case officer:	David Cox

Recommendations:

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

Further Information Required: all comments in Table below relate to PL/2025/02846

	Issue	Policy/Legislative Compliance	Date Information Requested & Further Information Required	Satisfactorily Addressed (Document & Date)
1.	Bats	Habs Regs. NPPF 2024. CP50.	28/04/2025 - Confirmation is required on whether works to Staverton House will require a Bat Mitigation (development) licence and mitigation/compensation for roosting bats. The response should be supported by sufficient evidence.	30/06/2025 Update Bat Survey Report (Focus Environmental Consultants, June 2025) provides update surveys and confirms a NE Bat Mitigation Licence will be

				required.
2.			28/04/2025 – Results of update bat surveys and updated bat mitigation/compensation strategy (as required). Bat mitigation/compensation measures must also be incorporated on enforceable plans e.g., architects' elevations.	30/06/2025 Completed surveys and updated mitigation/compensation strategy provided in Update Bat Survey Report (Focus Environmental Consultants, June 2025). 31/07/2025. Details now added to: Proposed Elevations: West Elevation, South Elevation. Rev D. (Carless & Adams, 16 July.2025). Proposed Elevations: East Elevation, North Elevation. Rev D. (Carless & Adams, 16 July.2025). Proposed Sections H, J & K. Rev C. (Carless & Adams, 14.03.2025).

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 and aerial photography of the site and surrounding area, together with GIS layers of statutory and non-statutory sites and existing records of protected species.

The application is supported by a Bat Survey Report (July 2023), Update Preliminary Roost Assessment (February 2025) and Biodiversity Net Gain Assessment (March 2025) by Focus Environmental Consultants.

The 2023 surveys confirmed the presence of a common pipistrelle maternity roost, a brown long-eared day roost and four common pipistrelle day roosts in the Old Vicarage (B1). No bat roosts were recorded roosting in the adjoining buildings (B2 and B4). Staverton House (B3) was not included in the surveys.

The Update Preliminary Roost Assessment (February 2025) report states that conditions have not changed since the 2023 survey but that two nocturnal bat surveys will be carried out to "confirm the characteristics and number of bat roosts within the structure in order to inform a Bat Mitigation (development) licence". Staverton House was discounted from the assessment despite likely impacts to the exterior (including the roof) during the construction of the new extension to this building. Confirmation is required on whether works to Staverton House will require a Bat

Mitigation (development) licence and mitigation/compensation for roosting bats. The response should be supported by sufficient evidence.

All bat mitigation/compensation measures must be incorporated into enforceable plans for the development e.g. architect's elevations drawings.

The Old Vicarage and B4 have potential for nesting birds. The proposed locations of six swift bricks have been shown on the Proposed Elevations Drawings (ref: A-1075 30B and A-1075 31B). This number of bricks is consistent with previous applications and whilst welcomed it is noted that Salisbury & Wilton Swifts have recommended at least 10 swift/universal integrated bricks.

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 (completed 17 March 2025) confirming the baseline and predicted post- development biodiversity units of site has been submitted (including the condition assessment sheets and maps).

Information in the completed on-site baseline habitat tabs is accepted as accurate based on the information submitted. The pre-development (baseline) situation is summarised below.

On-site pre-development (baseline) biodiversity value	2.16 Habitat units
	0.06 Hedgerow units
	0 Watercourse units
Are there any irreplaceable habitats on-site?	No
Has any habitat degradation of occurred?	Yes

A monitoring fee and condition to secure a Habitat Management and Monitoring Plan for on-site BNG will not be required. Although this is a major application the creation of new habitat within the site is minimal and of lower value/distinctiveness, with the majority of the habitat creation/enhancement required to meet the 10% BNG objective located outside of the site.

Habitat Regulations Assessment

The application site is located within a 4 km 'core area' for greater horseshoe around a core roost at Gripwood. The application site is also within the grey zone of the Trowbridge Bat Mitigation Strategy.

The current application, with updated/revised plans, is very similar to that submitted under PL/2023/04128 and PL/2021/10237. An Appropriate Assessment (AA) under the Habitats Regulations was carried out by Wiltshire Council LPA for applications PL/2023/04128 and PL/2021/10237. The AA was concluded favourably and NE agreed with the LPAs conclusion on the AAs for both applications. As the proposals have not changed significantly between the previous applications and this application, the AA for PL/2023/04128 (completed 16/8/2023) can still be relied upon. **This may change depending on the results of the ongoing nocturnal bat surveys.**

Further Comments 30/06/2025

The documents detailed below have been submitted to address the information requested by my colleague Rachel Whyte:

Update Bat Survey Report (Focus Environmental Consultants, June 2025).

Draft Mitigation and Enhancement Elevation Plan I. (Focus Environmental Consultants, June 2025).

Draft Mitigation and Enhancement Elevation Plan II. (Focus Environmental Consultants, June 2025).

Draft Mitigation and Enhancement Elevation Plan III. (Focus Environmental Consultants, June 2025).

Mitigation and Enhancement Site Plan (Focus Environmental Consultants, June 2025).

Surveys including those completed this month (June 2025) confirmed the Old Vicarage has the following bats roosts:

- Common pipistrelle maternity roosts and four common pipistrelle day roosts
- Brown Long-eared bat maternity roost
- Whiskered bat day roost

Development works must be programmed to avoid the bat maternity season (May – August inclusive) and hibernation period (November – March inclusive).

The development works cannot be commenced until a Natural England Bat Mitigation Licence is granted.

Habitat Regulations Assessment

As previously stated, in terms of the Bath and Bradford-on-Avon Bats SAC, I have considered the revised proposals under the Habitat Regulations Assessment, and as the proposals have not changed significantly between the previous applications and this application, and no qualifying bats have been recorded roosting/foraging/commuting onsite, the AA for PL/2023/04128 (completed 16/8/2023) can still be relied upon.

Further information outstanding:

While the Updated Bat Report provides sufficient detail on mitigation/compensation and this has been incorporated onto the ecological plans, this detail must be provided on the architect's drawings to ensure consistency and enforceability.

31/07/2025

Additional comments added to address the Trowbridge and Westbury Bat Mitigation Strategy (TWBMS) which was adopted on 22 July 2025.

Developer contributions for strategic recreational pressure mitigation

The application is within the grey hatched medium risk zone of the TWBMS and the changes reflected in this document detail that contributions of previously collected by CIL can no longer take place and are replaced by the following:

Any new residential development Move less than 50 dwellings located within the grey hatched medium risk sensitivity zone must, where appropriate, expect to contribute to strategic recreational pressure mitigations via section 106 agreement a section 111 agreement or unilateral undertaking in brackets legal fees will apply as follows:

- For residential development calculated at £925.00 per dwelling which will be payable through s106, s111 or a unilateral undertaking.

22/06/2026

Relevant revised documents:

Landscape Proposals Plan including hard landscaping details. Rev B. (MHP, Feb 2026).
Proposed Elevations: East Elevations; North Elevations. Rev A. (Carless-adams, 27/04/2026).
Proposed Elevations: West Elevations; South Elevations. Rev A. (Carless-adams, 27/04/2026).
Proposed Sections: H, J, & K. Rev A. (Carless-adams, 27/04/2026).
Proposed Sections: E & F Rev A. (Carless-adams, 27/04/2026).
Statutory metric calculation completed by J Jamieson (V5 revised April 2026)

Trowbridge & Westbury Bat Mitigation Strategy (TWBMS)

The application site is located within the 'grey hatched' recreational zone of the TWBMS and therefore has potential to result in significant adverse impact on the special features of the Bath & Bradford on Avon Bats Special Area of Conservation (SAC). Appropriate Assessment (AA) under Section 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) must be carried out by the relevant Competent Authority (the LPA) to determine the potential significant effects and the suitability of any measures proposed to avoid or mitigate those effects.

However, as the development proposals are for a Care Home specialising in dementia care, no additional recreational pressure is anticipated, and as such the mitigation payment is not required.

Bath & Bradford-on-Avon Bats SAC Habitat Regulations Assessment

The application site is located within a 4 km 'core area' for greater horseshoe around a core roost at Gripwood and therefore must be considered under the Habitat Regulations.

As stated under the comments for PL/2025/02846 dated 30/06/2025, in terms of the Bath and Bradford-on-Avon Bats SAC, as the proposals have not changed significantly between the previous applications and this S73 application, the Appropriate Assessment for PL/2023/04128 (completed 16/8/2023) can still be relied upon.

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 (V5 revised April 2026) confirming the baseline and predicted post- development biodiversity units of site has been submitted (including the condition assessment sheets and maps).

Information in the completed on-site baseline habitat tabs is accepted as accurate based on the information submitted. The pre-development (baseline) situation is summarised below.

On-site pre-development (baseline) biodiversity value	2.16 Habitat units
	0.06 Hedgerow units
	0 Watercourse units
Are there any <u>irreplaceable</u> habitats on-site?	No
Has any habitat <u>degradation</u> of occurred?	Yes

A monitoring fee and condition to secure a Habitat Management and Monitoring Plan for on-site BNG will not be required. Although this is a major application the creation of new habitat within the site is minimal and of lower value/distinctiveness, with the majority of the habitat creation/enhancement required to meet the 10% BNG objective located outside of the site.

Revised CONDITIONS:

1. The development will be carried out in strict accordance with the following documents:
 - Arboricultural Method Statement. Rev A (Arbtech, 29 March 2025).
 - Arboricultural Impact Assessment. Rev A. (Arbtech, 28/03/2025).
 - Tree Protection Plan. Rev A. (Arbtech, March 2025).
 - Landscape Proposals Plan including hard landscaping details. Rev B. (MHP, Feb 2026).

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

2. 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.

3. The development will be carried out in strict accordance with the following plans (or otherwise superseded by the European Protected Species Mitigation Licence obtained from Natural England):
 - Draft Mitigation and Enhancement Elevation Plan I. (Focus Environmental Consultants, June 2025).
 - Draft Mitigation and Enhancement Elevation Plan II. (Focus Environmental Consultants, June 2025).
 - Draft Mitigation and Enhancement Elevation Plan III. (Focus Environmental Consultants, June 2025).

- Mitigation and Enhancement Site Plan (Focus Environmental Consultants, June 2025).

The roost and access point opportunities for bats, as detailed in the above plans shall be implemented prior to the completion of the development hereby permitted under the supervision of an appropriately qualified ecologist. The details shall be maintained in for the lifetime of the development, unless otherwise agreed in writing by the Local Planning Authority.

The condition will be discharged when photographic evidence of installed features have been submitted to and approved in writing by the local planning authority

REASON: To mitigate for impacts to bats arising from the development.

Final sign off – all matters addressed:

Ecologist	Date
Mary Holmes	17/07/2025
	updated 31/07/2025
	Revised 22/06/2026