

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	08/07/2026
Application number:	PL/2026/02955
Proposal:	Proposed Agricultural Building
Site address:	Conkwell Grange, Conkwell, Limpley Stoke, Bath, BA2 7FD
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

Appropriate Assessment regarding the Bath and Bradford-on-Avon bat SAC has been sent to Natural England (14/07/2026) who must agree the conclusion prior to determination.

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:

- Proposed Site Plan, Holland Green, April 2026
- Preliminary Ecological Appraisal and Preliminary Roost Appraisal, Wildwood Ecology, 2026
- Statutory Biodiversity Metric, Jessica Boddy, April 2026
- Pre-development habitat plan, Wildwood Ecology, April 2026
- Post-development habitat plan, Wildwood Ecology, April 2026
- Condition assessment sheets
- Biodiversity Gain Plan

The site comprises a grassland field adjacent to a building and treeline, within a rural setting. It is neighboured by woodland to the south and further grassland to the north and east. It is proposed to construct an agricultural building.

COMMENTS:

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

The site lies within 11 roost buffers for Greater Horseshoe, Lesser Horseshoe and Bechstein's bats associated with the Bath and Bradford-on-Avon Bats SAC. It therefore may have the potential to result in significant adverse impact on the special features of that site. Appropriate Assessment (AA) under Section 63 of the Habitats Regulations 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.

An Appropriate Assessment has been completed by the LPA with a favourable conclusion, subject to suitable mitigation measures (a Construction Method Statement, habitat mitigation and lighting condition) being secured by condition and implemented. The AA has been sent to Natural England (14/07/2026) and the application must not be determined until they have agreed with the LPAs conclusion.

Protected species and habitats

As noted above, a Construction Method Statement (CMS) is necessary and must include precautionary measures for bats, nesting birds, herpetofauna, badgers and hedgehogs. The proposed building will be connected to an existing off-site building to the west. During emergence surveys undertaken for 18/07078/FUL, two possible pipistrelle emergences were observed from the existing building.

The ecological appraisal submitted presently (Wildwood Ecology, 2026) states that this adjacent building now has no obvious potential roosting opportunities; the internal space is exposed and there are limited access points. It is now assessed as having negligible roosting potential. The proposed connected building will sit below the existing roofline of the adjacent building, and the existing roof structure will be retained. In any case, a precautionary approach should be taken and detailed within the CMS.

The site is 85m east of Conkwell Wood, an ancient woodland County Wildlife Site (CWS). CP50 requires that CWSs are protected from the effects of development, and that proposals must demonstrate how features of nature conservation can be protected. Protective measures with regard to the CWS must therefore also be included in the Construction Method Statement.

In line with the NPPF and with CP50, applications must also ensure that proposals include gains for biodiversity. The ecology report's recommendations of hibernacula, bat boxes and bird boxes are welcomed, and 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, maps (*Statutory Biodiversity Metric, Jessica Boddy, April 2026; Pre-development habitat plan, Wildwood Ecology, April 2026; Post-development habitat plan, Wildwood Ecology, April 2026*) and condition assessment sheets estimating 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	4.26 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 deliver BNG onsite through the planting of ~57 trees and a hedgerow, as well as grassland enhancement.

CONDITIONS:

1. Compliance with submitted documents

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

- Proposed Site Plan, Holland Green, April 2026
- Preliminary Ecological Appraisal and Preliminary Roost Appraisal, Wildwood Ecology, 2026
- Post-development habitat plan, Wildwood Ecology, April 2026

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

2. Artificial 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.

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, nesting birds, badgers, reptiles and Conkwell Wood. 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. Enhancements for Biodiversity

Prior to the commencement of any works, details of the number, design and locations of ecological enhancements – including the type and locations of bat roosting and bird nesting opportunities – 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.

Sign off by WC Ecologist will only be given once ALL outstanding information has been submitted and agreed sufficient.

Ecologist Abi Gazzard	Date 14/07/2026
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