

Council Planning Consultation Response

ECOLOGY

Officer name:	Elizabeth Burrows
Date:	12/03/2026, 15/07/2026 (red text)
Application No:	PL/2025/09486
Proposal:	Reserved Matters Application for a) The scale of the development; b) The layout of the development; c) The access road and the 'foot-cycleway' connecting the housing with the A361: including kerbing, any cutting/embankment/retaining structures, camber, surfacing, drainage and the stream crossing; d) The external appearance of the development; e) The landscaping of the site following outline planning consent 20/00379/OUT
Site Address:	Land South of Trowbridge
Case Officer:	Jemma Foster

Recommendations:

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

Appropriate Assessment is required. Further information is required in order to conclude the AA positively.

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date submitted)
1	Impact Assessment	CP50, NPPF	Update survey/s. Updated impact assessment.	No
2	Bath and Bradford of Avon Bat SAC Habitat Regulations Assessment	CP50, Habitats Regulations	Update survey/s. Updated impact assessment. Updated metric calculation. Detailed design of bridge over Lambrook Stream and footpaths in northern boundary to confirm resulting width of gaps in vegetation.	No
3	LEMP	Condition 12	Amended LEMP to addressing the issues raised.	Please refer to comments on DoC application PL/2026/01153 for further comments on the LEMP.

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 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.

Information considered:

- Composite Planning Layout. Wain Homes.
- Section 278 Agreement Site Access, Highway Improvements and Emergency Access General Arrangement
- Planting Plan, Schedule and Specification Notes. Drawing Number PP01.00. Rev P4. (PGLA Landscape Architects, Nov 2025).
- Planting Plan Sheet 1 – 29. Drawing Number PP01.01. Rev P4. (PGLA Landscape Architects, 10/01/2025).
- ~~Landscape and Ecological Management Plan. Southwick Court Far, Trowbridge. (ge consulting, 28th November 2025).~~
- Planning Layout sheets 1-3. Drawing Number 0844-102030-COL. (Focus on Design, September 2025).
- Landscape and Ecological Management Plan V3. Southwick Court Far, Trowbridge. (ge consulting, 28th November 2025).
- Culvert Sections Dwg Ref: 0844-108 (Wain Homes, May2026)
- Typical Return Detail Dwg Ref: IN5100_GG_XX_XX_DR_X_006 (GeoGrow, 08/06/2026).

COMMENTS:

In accordance with the outline permission this application is for 180 dwellings. It is noted that the Composite Planning Layout and Planting Plans broadly accord with the approved Green Infrastructure Plan (Drawing Ref: 15002 PP 03 Rev U), as endorsed at Appeal APP/Y3940/W/23/3321957. In particular, they generally adhere to the required Ecology Buffer Zones.

The exception is along the northern boundary, where the Composite Planning Layout shows Ecology Buffer Zones A and B being crossed in three locations by 900mm-wide paths and in one location by a 1,200mm-wide path. The resulting breaks in vegetation indicated on the Landscape Plans would not, in principle, raise concern. However, it is noted that the Section 278 Agreement Site Access, Highway Improvements and Emergency Access General Arrangement identifies the “New Emergency and Shared Pedestrian/Cycle Access to Westmead Crescent” as 3.2 m wide, rather than 1.2m. **Detailed design of bridge over Lambrok Stream and paths in northern boundary to confirm the required extent of vegetation and resulting width of gaps in vegetation is required to demonstrate that Ecology Buffer Zones A and B will not be fragmented to a degree that would adversely affect bat foraging and commuting functionality.**

The submitted Landscape and Ecological Management Plan V3 confirms the breaks in vegetation at the northern boundary are acceptable. It is stated that the culvert will be 9500mm however according to the Culvert Sections Dwg Ref: 0844-108 (Wain Homes, May2026) and Typical Return Detail Dwg Ref: IN5100_GG_XX_XX_DR_X_006 (GeoGrow, 08/06/2026) the gap in tree and shrub vegetation along Lambrok Stream will exceed this once the grass road verges, retained wall and head walls are taken into account. The actual gap in tree and shrub vegetation associated with the culvert must be confirmed and it must be demonstrated that bat foraging and commuting functionality will not be adversely affected.

Specific measures to enhance the stream corridor and maintain ecological connectivity for other species are not shown on the submitted plans. It must be demonstrated that Lambrok Stream will continue to function as a corridor to aquatic species and be navigable by associated protected and notable species. Specifically features designed to facilitate safe passage of otter and water vole through and over the culvert must be provided. In accordance with the Ecological Assessment Report (engain, 2 February 2021) submitted with the parent application it is anticipated that features designed to facilitate safe wildlife passage through the culvert, such as provision of a dry ledge or passage, barriers along the deck to discourage wildlife from crossing at road level, and appropriate landscaping to funnel animals towards the culvert will be provided. These features must be specified on plans.

The application is not supported by updated surveys. **To ensure the baseline, associated impact assessment, and biodiversity change calculations remain accurate, an updated walkover survey is required. Where this survey identifies significant changes in site conditions, an updated impact assessment supported by updated detailed surveys must be provided. As detailed landscape plans are now available, the biodiversity metric must also be updated to confirm that the development will result in no net loss of biodiversity.**

Landscape and Ecological Management Plan

The Landscape and Ecological Management Plan (LEMP) is welcomed and whilst it provides detailed management regimes it does not include the following information required by condition 12 (my emphasis):

- Requirement to preclude the use of glyphosate
- Distinguishing between land required to meet mitigation and BNG objectives.
- Details of how habitats are created will be managed to achieve predicted BNG gains for the duration of the development.

To safeguard on-site habitat Zones A and B in accordance with the TWBMS on-site mitigation standards the LEMP must be amended to state the ongoing requirement to maintain compliance with the TWBMS standards. To provide clarity the main principles and objectives of the TWBMS standards should be included.

Lambrook Stream should be identified as a feature of value to biodiversity including associated protected and notable species. **To provide clarity the main principles and objectives for the protection and enhancement of this feature should be emphasised.**

The protected and notable species otter, water vole, reptiles, rooting bats, amphibians and birds are known and or anticipated to be present on site. **The LEMP must be amended to identify operations that may result in harm to these species, specify measures required to avoid harm and deliver enhancements.** To provide clarity habitats and features considered likely to support these species should be specified and ideally identified on a plan. These areas should then be subject to management that seeks to benefit them.

The number of Ecological Enhancement Features displayed on Figure 1 of the LEMP are welcomed. **The Management Schedule must be amended to include these features. Confirmation that these features have been included on an enforceable plan and technical drawings is required.**

The LEMP must be amended to address the issues raised and re-submitted to the LPA for approval.

Please refer to comments on DoC application PL/2026/01153 for further comments on the LEMP.

Habitats Regulation Assessment (HRA) – Bath and Bradford on Avon Bat SAC

The application site is within a consultation zone for bats associated with the Bath & Bradford on Avon Bats Special Area of Conservation (SAC) and therefore has potential to result in significant adverse impact on the special features of that site. 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.

Insufficient information has so far been submitted to enable the AA to be concluded positively. Further information required is highlighted in bold in the draft AA below.

PART A: INFORMATION REVIEWED	
Information about the plan or project	PL/2025/09486 Reserved Matters Application for a) The scale of the development; b) The layout of the development; c) The access road and the 'foot-cycleway' connecting the housing with the A361: including kerbing, any cutting/embankment/retaining structures, camber, surfacing, drainage and the stream crossing; d) The external appearance of the development; e) The landscaping of the site following outline planning consent 20/00379/OUT.

	Site Location: Land South of Trowbridge. The site benefits from outline consent for with all matters reserved except access for the erection of up to 180 residential dwellings (Use Class C3); site servicing; laying out of open space and associated planting; creation of new roads, accesses and paths; installation of services; and drainage infrastructure. The layout broadly reflects the plans approved under the parent outline consent (20/00379/OUT), permitted at Appeal APP/Y3940/W/23/3321957. The LPA, Natural England and Inspector reached a positive conclusion on the Appropriate Assessment in respect of potential impacts on the Bath and Bradford on Avon Bats SAC for 20/00379/OUT.
European Site	Bath and Bradford on Avon Bats Special Area of Conservation (SAC)
List of European Site interest features	This development is screened into appropriate assessment in relation to the Bath and Bradford on Avon Bats SAC as it lies within both the yellow and grey zones where the Council has identified a potential for development to lead to an increase in recreational pressure at woodlands in south Trowbridge and to reduce bat habitat in a zone beyond the woodlands. Background information for this appropriate assessment is contained in the Trowbridge Bat Mitigation Strategy (TBMS) and Trowbridge & Westbury Bat Mitigation Strategy (TWBMS) which was adopted as of July 22nd 2025. The SAC's qualifying Features are as follows: 1. Bechstein's bat <i>Myotis bechsteinii</i> 2. Greater horseshoe bat <i>Rhinolophus ferrumequinum</i> 3. Lesser horseshoe bat <i>Rhinolophus hipposideros</i> The conservation objectives for the site are: "To ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; • The extent and distribution of the habitats of qualifying species; • The structure and function of the habitats of qualifying species; • The supporting processes on which the habitats of qualifying species rely • The populations of qualifying species; and • The distribution of qualifying species within the site." Publication Date: 27th November 2018 – version 3. This document updates and replaces an earlier version dated 30 June 2014 to reflect the consolidation of the Habitats Regulations 2017. CHECK
Information about the site	Supplementary advice was published by Natural England last updated on 20 March 2019 and sets out further details of the requirements needed to achieve the conservation objectives. Of particular relevance to the Trowbridge area is the need to "Maintain the presence, structure and quality of any linear landscape features which function as flightlines. These should remain unlit functioning as dark corridors." In the Site Improvement Plan dated 1 April 2015, the lack of knowledge about the roosting habits of Bechstein's and the foraging / commuting habitats of all three SAC species is judged by Natural England to be a threat to achieving the conservation objectives of the SAC. Bat ringing data has shown the same bats using Green Lane Wood (and surrounding woodlands) and the SAC. The woodlands are therefore considered to be functionally linked to the SAC and it is possible the conservation objectives for the SAC may not be met if the bats are disturbed or prevented from breeding there. Studies have shown that Bechstein's bats are not confined to the woodlands but travel to find additional foraging and roosts outside them. Consequently, the

	TWBMS recognises the importance of both the woodlands and their surrounding habitats through 2 buffer zones. - Extending 600m from the woodland edge, the red zone is an area of development restraint due to the high probability that this zone is of current and future importance for maintaining the breeding colonies. ii) Beyond this the yellow zone, which takes into consideration the foraging areas and flightlines of horseshoe bats, is anticipated to be able to accept a degree of development pressure provided applications are designed in accordance with the principles in the TWBMS. - The grey hatched zone identifies the distance within which 75% of visitors to Green Lane Wood, Biss Wood, Picket and Clanger Woods are expected to come from and a package of mitigation measures is identified in the TWBMS to accommodate the anticipated growth within this zone.
Other relevant plans or projects	- Wiltshire Core Strategy adopted January 2015 - Trowbridge & Westbury Bat Mitigation Strategy (adopted 2025) - Outline planning permission with all matters reserved except access for the erection of up to 180 residential dwellings (Use Class C3); site servicing; laying out of open space and associated planting; creation of new roads, accesses and paths; installation of services; and drainage infrastructure. 20/00379/OUT. Permitted. 20/09659/FUL Erection of 50 dwellings and associated access and landscaping works. Permitted. 18/10035/OUT Outline application for residential development (up to 55 dwellings) with the creation of new vehicular access off Frome Road and removal/ demolition of all existing buildings (all matters aside from the formation of the new vehicular access are reserved). Permitted.

Assessment against TWBMS criteria

Item	TWBMS/ TBMS criteria	Details provided for Application
1	Surveys should be completed: - In accordance with Council pre-application advice if provided - In accordance with BCT Good Practice Guidelines and the specifications described in Section 6 (p25-28) of the TWBMS	The parent application 20/00379/OUT was supported by an acceptable level of bat survey carried out between 2016 and 2020. The current application isn't supported by survey. An update survey confirming current conditions of the site is required.
2	Masterplan to be provided which covers entire allocation (referenced in WHSAP housing policies) and identifies: - Core Bat Habitat features - Retention and provision of wide swathes of core bat habitat.	The masterplan titled "<i>Coordinated Strategy Masterplan – H2.4/ H2.5/ H2.6 Allocation</i>" (Greenhalgh, 21/04/2021) prepared to support the adjacent application (20/09659/FULL) covers the application site and shows core bat habitat features. The Green Infrastructure Plan (Drawing Ref: 15002 PP 03 Rev U), approved at Appeal APP/Y3940/W/23/3321957 was consistent with this masterplan.
3	<u>For outline applications</u>, Ecological Parameters Plan incorporating TWBMS standards for habitat mitigation.	Not applicable for this is a full application.
4	Biodiversity Net Gain Calculations demonstrate no net loss of habitat has been provided for all habitat lost where the yellow zone and the application boundary overlap.	The BNG assessment submitted with the parent application predicted benefits in habitat units of 13.74%, hedgerow units of 14.60% and River units of 10.29%. This calculation was based on baseline survey carried out in 2016 and therefore no longer considered valid.

		To confirm the validity of the BNG calculations an update metric calculation using the requested updated baseline survey and detailed landscape plans is required.
5	For reserved matters and full applications, an Ecological Mitigation Plan to be submitted.	Condition 4 of the outline permission requires the development to be in accordance with the approved Green Infrastructure Plan (Drawing Ref: 15002 PP 03 Rev U) and Lighting plan (Drawing Ref: 150203 PP 04 Rev R). These plans specify required ecological parameters (buffers, landscaping, zones A and B and lighting, limit of built development). The composite Planning Layout broadly accords with the approved Green Infrastructure Plan (Drawing Ref: 15002 PP 03 Rev U) demonstrating the layout broadly accords with the required habitat delivery and buffers. Detailed design of bridge over Lambrook Stream and footpaths in northern boundary required to confirm the width of gaps created in vegetation by these features. Further details secured by Conditions 4 (compliance), 7 (lighting), 8 (access road lighting), 10 (CEMP) and 12 (LEMP).
7	For <u>Reserved Matters and Full applications</u> , CEMP to set out: • Location of temporary work areas. • Schedule of works covering removal, enhancement and creation of habitat features in relation to construction works. • Details of compliance arrangements and how staff will interface with Council TWBMS Project Officer. • Management of habitats during the construction phase.	A CEMP is required by condition 10 of the outline permission. The application for discharge of the CEMP condition will be subject to AA.
9	Application to demonstrate measure to ensure core bat habitat will remain relatively undisturbed by the effects of urbanisation.	The Composite Planning Layout indicates that core bat habitat will be delivered in accordance with the approved plans and the TWBMS standards for on-site habitat mitigation. Further the conditions require the development to be undertaken in compliance with the Zone A and Zone B standards, ensuring that disturbance arising from urbanisation is minimised.
10	For <u>Reserved Matters and Full applications</u> , LEMP to set out: • Plan showing extent of habitats which the Management Company will be responsible for • Management objectives for each habitat • 1 and 5 year schedules of management activities including replacement /restoration works where damage occurs. • Review mechanism	A LEMP is required by condition 12 of the outline permission. The application for discharge of the LEMP condition will be subject to AA.
11	The potential impacts of lighting are adequately modelled and assessed with appropriate mitigation included to minimise the effects artificial	Condition 4 of the outline permission requires the development to be in accordance with an approved Lighting plan (Drawing Ref: 150203 PP 04 Rev R).

	lighting across the site in accordance with section 8.3.	Condition 7 requires further details on light appliance, illumination levels and light spillage to be approved by the LPA prior to the installation of lighting. Condition 8 specifies that the proposed access road and foot-cycleway shall not be illuminated. These DoC will be subject to AA.
12	An appropriate lighting monitoring regime has been provided.	Condition 4 of the outline permission requires submission of a post-installation lighting survey to be submitted to and approved by the LPA within 1 month of its use. This DoC will be subject to AA.
14	Yellow Zone: The applicant agrees that a financial contribution towards the Council led scheme for mitigating residual effects from loss / degradation of bat habitat will be secured by S106.	Bat Mitigation Contribution for mitigating residual effects from loss / degradation of bat habitat has been secured by S106. The payment is for 180 dwellings and the RM application is for 180 dwellings. The trigger for payment of the contribution is on commencement of development.
15	Grey Hatched Zone:	This is a WHSAP site and therefore covered by the strategy set out in the TBMS. The Council would contribute £641.48 per dwelling from the Community Infrastructure Levy receipts towards management of recreational pressures

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 this is an approval of reserved matters and the application for outline planning permission was made before 12 February 2024.

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:

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

Ecologist	Date