

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Mary Holmes MCIEEM
Date:	21/07/2026
Application number:	PL/2026/02943
Proposal:	Outline application (with all matters reserved except for access) for the erection of up to 224 residential dwellings (Class C3), 72-bed care home (Class C2), with sports pitch provision, country park, allotments, landscaping and open space.
Site address:	Land off Trowbridge Road, Bradford-on-Avon
Case officer:	Steven Sims

Recommendations:

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

Summary of Further Information Required (detailed text below Table):

	Issue	Policy/Legislative Compliance	Date information requested & Further information required Leave blank if no information required	Satisfactorily addressed (Document & Date)
1	Watercourses	CP50; NPPF	21/07/2026 The pond/ditches and watercourses to be detailed on the EPP along with associated buffer zones as detailed in the EcIA	
2	Bats & Trees	Habs Regs; WCA; CP50	21/07/2026 The location of all trees containing PRFs and their likely suitability for maternity roosting bats needs to be detailed and mapped on the Ecological Parameters Plan, with suitable stand-off distances and protective measures where necessary	
3	Badgers	Protection of Badgers Act	21/07/2026 The location of all retained badger setts together with their protection buffers should be clearly identified on the Ecological Parameters Plan. Any commuting corridors linking retained setts should also be identified and maintained within the surrounding development framework.	

4	Birds – Skylark Sedge Warbler	WCA; NERC Act; CP50	21/07/2026 <u>Skylark</u> Further information to demonstrate that suitable skylark habitat can be retained and managed in the long-term. See below for additional details <u>Skylark & Sedge Warbler</u> Ecological Parameters Plan detail required Identify retained and enhanced habitats for both species, together with any associated buffer zones and dark corridors for both species.	
5	Birds - Barn Owl	WCA	21/07/2026 All trees containing cavities with potential roosting/breeding features for barn owl should be identified on the Ecological Parameters Plan	
6	Beavers & Otter	Habs Regs/WCA.	21/07/2026 The proposed retention of riparian habitats and 10 m buffer zones must be clearly identified and secured on the EPP.	
7.	Bats & Trees	Habs Regs; WCA	21/07/2026 All important bat commuting and foraging habitats should be protected by a minimum 10 m dark buffer and clearly identified on the Ecological Parameters Plan (EPP), with compliance demonstrated through a site-wide lighting assessment to maintain habitat connectivity for bat species associated with the Bath and Bradford-on-Avon Bats SAC.	
8	Bats & Lighting	Habs Regs	21/07/2026 Site-wide Lighting Strategy including lux contours to demonstrate that lighting mitigation measures can be achieved along Important bat commuting and foraging habitats. Information to be detailed on the EPP.	
9	Biodiversity Net Gain	Environment Act	21/07/2026 Clarification on Watercourse entry in the Statutory Metric – see below for details All veteran trees to be included in the metric.	

Please Note: 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.

When resubmitting a revised document, ALL changes must be highlighted to enable review.

Matters Considered

Thank you for consulting me on the above outline application in relation to ecology. I have reviewed the relevant submitted information as detailed below against 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.

Ecological Impact Assessment (GE Consulting Services (UK) Limited, 22 April, 2026).

Illustrative Layout. Drwg.. no. 250310 L 02 03. Rev E. (Clifton Emery Design, Feb 2026).

Shadow Habitat Regulations Assessment. (GE Consulting Services (UK) Limited, 22 April, 2026).

Statutory Biodiversity Metric completed by Ryan Yeates 22.04.2026.

Biodiversity Net Gain Statement and Assessment. (GE Consulting Services (UK) Limited, 22 April, 2026).

Arboricultural Impact Assessment. GE Consulting Services (UK) Limited, 17 April, 2026)

Parameter Plan. Drwg. No. 250310 PP 02 01. Rev C. (Clifton Emery Design, March 2026).

Introduction/Context

The site comprises a network of predominantly sheep-grazed modified grassland fields, together with native hedgerows/species-rich hedgerows/hedgerows with trees, tree lines, mature individual trees, two veteran trees, a pond and associated areas of scrub and tall ruderal vegetation. The site is bounded by a number of important ecological features, including the River Avon County Wildlife Site (CWS) corridor to the north, Wid Brook and Widbrook Wood Local Wildlife Site (LWS) to the east, the Kennet and Avon Canal (CWS) to the south and broadleaved woodland immediately adjoining the southern boundary. These habitats provide strong ecological connectivity within the wider landscape and support a range of ecological receptors including Annex II bat species associated with the Bath and Bradford-on-Avon Bats SAC, breeding birds, otter and beaver.

Baseline

Ponds/Ditches/Watercourses

There is one pond on-site that will be retained and protected within the development. In addition, two SuDS basins (c. 0.54ha) will also be created within the site and although they will not be permanently wet, they will still hold water and comprise a variety of aquatic and marginal vegetation. With the proposed mitigation and compensation measures no significant impacts are anticipated on ponds, with the measures proposed considered to represent a significant enhancement for pond habitat within the site.

The ponds/ditches and all watercourses to be detailed on the EPP along with associated buffer zones as detailed in the EclA.

Bats & Trees (including Veteran Trees)

The Arboricultural Impact Assessment identifies two veteran field maples (T11 and T13) as the most significant trees on site. Veteran trees are considered irreplaceable habitats under the National Planning Policy Framework. However, the ecological assessment identifies potential roost features (PRFs) within a number of trees (T1–T6), and it is currently unclear whether any of these features could support maternity roosts or other significant bat roosting opportunities. Whilst it is anticipated at this outline stage that all trees will be retained, the location of all trees containing PRFs and their likely suitability for maternity roosting bats needs to be detailed and mapped on the Ecological Parameters Plan, with suitable stand-off distances and protective measures where necessary.

Further bat roost assessment should be undertaken at the detailed design stage where impacts to trees with PRFs cannot be ruled out

Badgers

The EcIA identifies five badger setts within the site, of which three were confirmed active during monitoring surveys undertaken between May and June 2025. As these are features of potential ecological constraint, the location of all retained badger setts together with their protection buffers should be clearly identified on the Ecological Parameters Plan. This will ensure that future detailed design/reserved matters application, including the siting of development, access routes, public open space, landscaping and lighting, are designed to avoid impacts on retained badger interests and maintain the integrity of the proposed mitigation strategy.

Please note: Any commuting corridors linking retained setts should also be identified and maintained within the surrounding development framework

Birds

The breeding bird surveys recorded a number of notable species within the site, including skylark and sedge warbler. Skylark is on the Birds of Conservation Concern Red List and is also listed under Section 41 of the NERC Act 2006. The skylark was recorded breeding within the central grassland fields that form part of the developable area.

Whilst the EcIA proposes the provision of two skylark plots within the proposed area of Public Open Space (POS), insufficient information has been provided to demonstrate that this mitigation will be effective in the long term. Skylark are a ground-nesting species associated with open and relatively undisturbed grassland habitats and can be sensitive to recreational activity and regular human disturbance. As the proposed skylark plots are located within accessible POS, it is unclear how these areas will continue to function as suitable breeding habitat following occupation of the development.

Further information should therefore be provided to demonstrate that suitable skylark habitat can be retained and managed in the long term, including details of plot design, management prescriptions, access arrangements and measures to minimise recreational disturbance.

Sedge warbler was recorded as a confirmed breeding species associated with the riparian habitats along the River Avon corridor. Whilst not a Schedule 1 species, it forms part of the breeding bird assemblage that the EcIA assesses as being of Local importance. The retention and enhancement of riparian habitats associated with the River Avon CWS and Wid Brook are therefore welcomed.

The Ecological Parameters Plan should clearly identify retained and enhanced habitats for both species, together with any associated buffer zones and dark corridors for both species.

Barn Owl

Whilst the EcIA concludes that the cropped and closely grazed grassland within the site is of limited value for foraging barn owl, the riparian corridor associated with the River Avon CWS to the north, the Kennet and Avon Canal CWS to the south, and the woodland edge and boundary habitats associated with Widbrook Wood LWS are all likely to provide suitable foraging and commuting habitat for barn owl. In addition, mature, veteran and cavity-bearing trees within and adjacent to these habitats may provide opportunities for roosting or nesting.

Given the presence of local barn owl records and the suitability of these boundary habitats, sufficient information should be provided at outline stage to identify any potential roosting or nesting features and demonstrate that they can be appropriately accommodated within the development framework. Therefore, as a minimum, both veteran trees and trees containing cavities with potential roosting/breeding features for barn owl should be identified on the Ecological Parameters Plan to inform future Reserved Matters applications.

Beavers

The EcIA identifies a breeding population of beaver associated with the River Avon CWS and evidence of beaver activity along Wid Brook CWS. Whilst the retention of a 10 m riparian buffer and associated habitat enhancement is welcomed, these areas form a key component of the mitigation strategy and should therefore be clearly identified and secured on the Ecological Parameters Plan (EPP).

Otter

Surveys have confirmed evidence of otter was recorded along Wid Brook CWS and the River Avon CWS, and Wid Brook corridors provide suitable commuting and foraging habitat. Whilst the proposed 10 m riparian buffers and habitat enhancements are welcomed, these measures must be clearly marked up with dimensions on the EPP.

Ecological Parameters Plan (EPP)

The application is located in a sensitive location and must therefore submit an Ecological Parameters Plan (EPP). An EPP is required to be submitted with all outline applications. The EPP must clearly identify those areas of the site which are unconstrained, those areas where sensitive design or restrictions may be required, and any areas of the site which are to be retained, remain undeveloped, enhanced, form part of the landscaping for the purposes of protecting and enhancing biodiversity and any areas to be used as compensatory habitat in line with the submitted ecology documents, including the Biodiversity Net Gain Calculator spreadsheet. The EPP will become an 'approved document' of any outline permission granted and any reserved matters application must be in compliance with the plan.

Figure 2 of the EcIA (Mitigation and Enhancement Plan) is a useful and welcomed illustration of the proposed ecological mitigation and enhancement measures. However, this information should be transferred to the stand-alone EPP to avoid confusion, ensure all ecological constraints and mitigation measures are presented in a single document, and provide a clear framework for any future reserved matters application/detailed design. It should also be noted that only one veteran tree is identified on Figure 2, and the tree numbering does not correspond with the Arboricultural Impact Assessment and Tree Constraints Plan. For consistency and clarity, all veteran trees, trees containing potential roost features (PRFs) and other key ecological constraints should be numbered and referenced in accordance with the Arboricultural Report and associated Tree Constraints Plan.

Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC) Habitat Regulations Assessment (HRA)

The application site is located within core buffer zones for lesser and greater horseshoe bats associated with the Bath and Bradford-on-Avon Bats SAC and the Council are aware that Bechstein's bats use habitats in the wider landscape. The core buffer zones for greater horseshoe bats are associated with Gripwood Quarry SSSI, Winsley Mines SSSI and Iford Manor SSSI, and the lesser horseshoe bat core roost areas associated with Belcombe Court and a small location within Bradford-on-Avon.

The application therefore has potential to result in significant adverse impact either alone or in combination with other projects on the statutorily designated (Insert name of European Site). As required by the Conservation of Habitats and Species Regulations 2017 (as amended) an Appropriate Assessment must therefore be completed by the LPA with a favourable conclusion.

The following information is considered as part of the HRA and requested further detail will feed into a bespoke AA.

Bat Activity/Lighting Constraints

The site was assessed as providing high suitability for commuting and foraging bats and surveys have recorded at least ten bat species. The bat activity surveys demonstrate that the most important habitats for Annex II bat species, particularly greater and lesser horseshoe bats, are concentrated around the site's boundary features. Survey results indicate that activity is focussed along the River Avon CWS corridor, Wid Brook corridor, Widbrook Wood CWS woodland edge, retained hedgerows and tree lines, which provide important commuting and foraging habitat and form part of the wider ecological network associated with the Bath and Bradford-on-Avon Bats SAC. The EclA also identifies trees with PRFs which contribute to this habitat network which could be used by Bechstein's bats.

These important habitats should be protected by a minimum 10 m dark buffer zone and be evidenced by a site-wide lighting assessment and principles for detailed design. The Ecological Parameters Plan should clearly identify all bat habitats and detail the dark corridors and associated buffer zones, with measurements stated to ensure these features are embedded within the development framework and safeguarded through any future reserved matters/detailed design application.

The shadow Habitat Regulations Assessment (sHRA) relies upon the retention of dark corridors and the avoidance of habitat fragmentation to conclude no adverse effect on integrity for the Bath and Bradford-on-Avon Bats SAC. However, no site-wide Lighting Strategy, lux contours or Ecological Parameters Plan have been provided to demonstrate that these mitigation measures can be achieved. Important bat commuting and foraging habitats, together with a minimum 10 m dark buffer, should be identified on an Ecological Parameters Plan and supported by a lighting strategy demonstrating compliance with BCT/ILP Guidance Note 08/23 and achievement of ≤ 0.5 lux across sensitive bat habitats.

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 statutory metric calculation completed by Ryan Yeates on 22nd April 2026 confirming the baseline and predicted post- development biodiversity units of the site has been submitted.

The baseline cannot be accepted and the following issues must be addressed prior to determination:

- Watercourses - The River Avon CWS runs along the northern boundary and is within 10m of the application boundary. Wid Brook runs along the eastern boundary and is also within 10m of the application boundary. The Statutory Biodiversity Metric guidance states that the watercourse metric should be considered where a river or stream lies within the red-line boundary or within 10 m of it. The submitted BNG assessment records watercourse units as N/A. Clarification is therefore required as to the basis for excluding the watercourse module, supported by plans showing the relationship between the red-line boundary and the River Avon.
- Veteran Trees – One tree is detailed in the metric but there are two on-site. All veteran trees must be entered as individual trees separately on a single data entry row and marked as irreplaceable habitat.

Bird and Bat Integrated Features

It is currently expected that all new developments will provide the ratio of 1:1 feature to building in line with *BS 42021:2022 Integral nest boxes – Selection and installation for new developments*. Integral features are generally maintenance-free and seek to benefit a target species/s or group/s and demonstrate viability in terms of position on building, location and clustering in accordance with relevant guidance and the additional features.

All details on exact locations and specifications for integrated features for birds and bats must be added to all working documents at the reserved matters/detailed design stage to avoid oversight and to ensure consistency and enforceability.

Final sign off – all matters addressed:

Ecologist	Date
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