

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	22/07/2026
Application number:	PL/2026/02926
Proposal:	Proposed warehouse extension to Unit 19c with associated works
Site address:	Unit 19c, Dunkirk Business Park, Frome Road, Southwick , Trowbridge, BA14 9NL
Case officer:	Steven Vellance

Recommendations:

☐	No Comment
☐	Support
☐	No objection
☐	Condition (no objection subject to conditions)
☒	Objection - further information required
☐	Objection in principle
☒	HRA completed. Appropriate Assessment with a positive conclusion has been sent to Natural England, who must agree the conclusion (within 21 days) prior to the application being permitted.

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date)
	GCN	Habitat Regs; CP50	22/07/2026 -Signed and countersigned Impact Assessment Conservation Payment Certificate (IACPC) for District Level Licencing	

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, 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:

- Existing Site Plan, Ashford Homes, May 2025
- Proposed Site Plan, Ashford Homes, May 2025
- Proposed Elevations, Ashford Homes, June 2025
- Planning, Design and Access Statement, PlanningSphere, May 2026
- Landscape Plan, Greenhalgh, April 2026
- Ecological Impact Assessment, GE Consulting, May 2026
- Biodiversity Net Gain Statement and Assessment, GE Consulting, April 2026
- Statutory Biodiversity Metric, Hamish Kidd, April 2026

The site comprises an area of modified grassland to the northwest of an existing warehouse, where it is proposed to construct a large extension. The site is bordered by an industrial area to the southeast, with grassland in all other directions.

COMMENTS:

Bath and Bradford on Avon Bat Special Area of Conservation (SAC)

The application site is located within the **yellow** zone of the Trowbridge & Westbury Bat Mitigation Strategy (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). The application must be considered under the Habitats Regulations.

The yellow medium risk zone represents areas where habitat has been shown to be of importance, and in particular takes into consideration the foraging areas and flightlines of horseshoe 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 TWBMS. 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. In order to conclude the AA favourably, applications impacting greenfield land and bat habitat (such as the present application) are expected to provide a S106 contribution prior to commencement of £30,000.00 per hectare towards habitat mitigation detailed in Section 9.1 of the TWBMS. The application should also demonstrate no net loss of bat habitat as per paragraph 146 of the TWBMS.

As required by the Conservation of Habitats and Species Regulations 2017 (as amended) an Appropriate Assessment must be carried out by the LPA, and in this case, against the TWBMS criteria (see below). **The AA has been sent to Natural England (22/07/2026) and the application must not be determined until they have agreed with the LPA's conclusion.**

APPROPRIATE ASSESSMENT FOR APPLICATIONS FALLING WITHIN THE YELLOW ZONE OF The Trowbridge and Westbury Bat Mitigation Strategy

Item	TWBMS criteria	Details provided for Application
1	Did the application seek pre-application advice to establish the extent to which the TWBMS will drive layout and design of the development. Note this is not crucial to a favorable AA.	Pre-application advice was sought (ENQ/2025/01302).
	<u>Greenfield sites in Yellow Zone</u>	
2	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 of the TWBMS	<i>Roosting bats</i> The existing warehouse was found to have negligible potential for use by roosting bats. <i>Bat activity</i> In the absence of any activity surveys, the ecology report states that " <i>the existing ditch and hedgerow are likely to serve as a commuting and foraging route for bats</i> ". The scrub, grassland and tall forbs are also

		assumed to provide some foraging opportunities.
3	Masterplan to be provided which covers entire allocation or large application	This is not an allocated site.
4	<u>Outline applications on green field sites in Yellow Zone</u> , Ecological Parameters Plan (para 161) to be provided	This is a full planning application and an EPP is not required.
5	<u>Greenfield Sites in the Yellow Zone.</u> Statutory Biodiversity Metric demonstrating no net loss. The calculation is supported by pre and post development maps. The post development maps align with other plans and drawings.	A Statutory Biodiversity Metric has been provided and predicts a gain of 0.22 habitat and 0.32 hedgerow units, on-site. There will be a loss of 0.13 ha tall forbs, 0.19 ha modified grassland and 0.08 ha scrub. The proposed habitat creation includes 0.06 ha scrub, 0.04 ha modified grassland, 0.05 ha other neutral grassland and 74 trees. Additionally, 0.05 km of native hedgerow is proposed. The habitat gains are considered appropriate and will help to improve the site for bats.
6	<u>For reserved matters and full applications on green field sites in Yellow Zone</u> , an Ecological Mitigation Plan to be submitted containing (para 162): (i) Scaled drawing to show • Details of replacement roosts. • Core bat habitat (foraging and commuting) to be retained, created and enhanced. • Location/extent and full landscape specifications for tree and shrub planting, wildflower grassland etc. (iv) proposals are in accordance with the standards for habitat mitigation and management as described at section 8.2 and Figure 6 in the TWBMS. (v) Wide swathes of unlit bat habitat with associated buffer zones ensuring landscape permeable to commuting bats. (vi) Retained core bat habitat connects to the wider habitat network.	An Enhancements and Mitigation plan is provided on page 21 of the ecology report. The figure states “ <i>fully integrated bat boxes to be installed [...] on the southeastern or southwestern elevations</i> ”. The exact details and locations can be confirmed post-determination, and secured by an enhancements condition. The landscape plan shows areas of new tree planting, native scrub and hedgerow, and should be secured via a compliance condition. An 8.5 m habitat buffer is proposed along the southwestern boundary. Although unlit habitat is not identified on the plans, no lighting is proposed, and any changes to this should be further secured via a lighting condition.
7	<u>Applications on green field sites in</u>	The planning statement notes that “ <i>the</i>

	<u>Yellow Zone</u>. Lighting Impact Assessment, including lux contour plots, in line with Section 8.3 of TWBMS.	<i>proposal does not have any external lighting or glazing” and that “the existing surrounding perimeter landscape will remain dark”.</i> A lighting condition should be applied to ensure that, in the event any lighting scheme is required, it is designed to be wildlife-sensitive.
8	<u>Reserved Matters and Full applications on green field sites in Yellow Zone</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 Construction Method Statement will be required by condition.
9	Application to demonstrate measures to ensure core bat habitat will remain relatively undisturbed by the effects of urbanisation.	The site is not within an urban area and this application does not relate to residential development/development that will increase urban-related pressures on core bat habitat.
10	<u>Reserved Matters and Full application on green field sites in Yellow Zone</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	Given the proposed scale of landscaping and presence within the Yellow Zone, a LEMP should be secured via condition.
11	The applicant agrees that a financial Strategic Habitat Mitigation Contribution (yellow medium risk bat sensitivity zone) of £1000.00/ dwelling or £30,000.00 per hectare will be secured by S106.	For this greenfield application within the yellow zone, the cost of mitigation via the Council’s strategic TWBMS would be based on the price per hectare, which is currently £30,000.00 per hectare. The site size is 0.69 ha. However, as per the BNG metric, 0.40 ha of greenfield habitat will be lost. As such, based on the latter figure, the

		contribution required would be $0.4 \times £30,000 = £12,000$. It is noted that the ecology report acknowledges the financial contribution requirement. The applicant should confirm agreement with the calculated contribution.
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Great Crested Newts (GCN)

GCN are a European Protected Species afforded stringent protection under the Conservation of Habitats and Species Regulations 2017 (as amended) and as such are a material consideration within the planning consultation process. Sufficient and appropriate mitigation measures to ensure that GCN are not adversely affected as a result of the proposed development must be submitted as part of the proposal.

There are records of GCN within 500m of the site, and the site offers suitable habitats for GCN during their terrestrial phase. As such, the ecology report states that registration under Natural England's District Level Licensing (DLL) scheme will be sought. Once the scheme is accepted under DLL for Great Crested Newts, the Impact Assessment and Conservation Payment Certificate (IACPC), which must be signed by the applicant and countersigned by Natural England, should be submitted to the LPA. Please note, 'Annex 3: Site Location' must also be submitted with the IACPC and correspond with the red line site boundary submitted with the planning application. This information is required prior to determination of the application (please see [Great crested newts: district level licensing for local planning authorities - GOV.UK](#)).

Other species and enhancements

The site provides some suitable habitats for other protected or notable fauna, such as reptiles, nesting birds, hedgehogs and badgers. Precautionary measures for these species must be detailed within a Construction Method Statement, to be secured via condition.

In line with CP50 and NPPF, enhancements for biodiversity should form part of the development. The ecology report's recommendations of integrated bat and bird boxes, as well as hibernacula, are welcomed. Exact specifications and locations should be shown on a biodiversity enhancement plan, to be secured via 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, condition assessments and pre-development plan (Biodiversity Net Gain Statement and Assessment, GE Consulting, April 2026; Statutory Biodiversity Metric, Hamish Kidd, April 2026) confirming the baseline and predicted post-development biodiversity units of the site has been submitted.

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	2.09 Habitat units
	1.82 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.

IN SUMMARY: 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 (the IACPC certificate) must therefore be submitted and reviewed by the LPA's ecology team prior to determination of the application.

CONDITIONS: wording to be provided once the above issues have been addressed

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

Ecologist	Date
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