

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	18/02/2026, 23/07/2026
Application number:	PL/2025/07147
Proposal:	Change of use of land to form overflow car park and recreational field with associated works. Change of use of public house car park to pub garden. Change of use of farm shop brewery to café and erection of extension. Change of use of part of Spa Barn (Sui Generis) to include learning and non-residential institute (Use Class F1)
Site address:	The Three Daggers and Hillside Cottage, Westbury Road, Edington, Westbury, Wiltshire, BA13 4PG
Case officer:	Helena Carney

Recommendations:

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

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date)
1.	BNG	Town and Country Planning Act 1990, Environment Act 2021	18/02/2026 -Condition assessment sheet for trees -Inclusion of all habitats within red line boundary	YES (23/07/2026) -Biodiversity Net Gain Statement, Providence Ecological, June 2026 -Condition assessment sheets -Statutory Biodiversity Metric, Alex Sams, December 2025, iteration 1

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:

- Planning Statement, Pegasus Group, August 2025
- Preliminary Ecological Appraisal, Providence Ecological, June 2025

- Ecological Impact Assessment, Providence Ecological, November 2025
- Biodiversity Net Gain Statement, Providence Ecological, December 2025
- Statutory Biodiversity Metric, Alex Sams, December 2021
- Farm Shop As Existing, Ashley Design, March 2025
- Farm Shop As Proposed, Ashley Design, March 2025
- Location Plan, Ashley Design, May 2025
- Biodiversity Net Gain Statement, Providence Ecological, June 2026
- Condition assessment sheets
- Statutory Biodiversity Metric, Alex Sams, December 2025, iteration 1

The site comprises an existing pub and associated car park and greenspace. It is proposed to change the use of land to form a car park and recreation field, and to convert some of the original car park into a pub garden. An extension to the site's farm shop is also proposed.

Thank you for re-consulting Ecology; my second comments are shown in blue.

COMMENTS:

Salisbury Plain Special Protection Area (SPA) 6.4km buffer

This application lies within the 6.4km zone of influence of the Salisbury Plain SPA and potential impact of recreational pressure on stone curlew, in combination with other plans and projects, must be considered.

A test of likely significance has been carried out by the relevant Competent Authority (Wiltshire Council) as required by Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended). This concluded that given the scale and nature of the development (there will be no additional overnight accommodation created), there is no mechanism for adverse effect, and any temporary construction impacts and operational impacts would be de-minimus. The HRA has concluded that the application is not likely to have significant impacts on Salisbury Plain SPA and subsequently the application is screened out of Appropriate Assessment.

Protected species

Suitable gaps for crevice-dwelling species were identified under the cladding of the farm shop. Subsequently, three bat emergence surveys were undertaken in August-September 2025. The surveys identified the presence of one individual soprano pipistrelle day roost, and another individual likely *Pipistrellus* sp. day roost.

Under the Conservation of Species and Habitat Regulations 2017, it is an offence to harm or disturb bats or damage or destroy their roosts. Planning permission for development does not provide a defence against prosecution under this legislation. The applicant is advised that a mitigation licence will be required before any work is undertaken to implement this planning permission.

The adults, young, eggs and nests of all species of birds are protected by the Wildlife and Countryside Act 1981 (as amended) while they are breeding. Please be advised that works should not take place that will harm nesting birds (such as vegetation clearance or building demolition) from March to August inclusive. The applicant is advised to check any structure or vegetation capable of supporting breeding birds and delay removing or altering such features until after young birds have fledged. The site was assessed as being unlikely to support other protected wildlife such as reptiles and great crested newts.

In line with the NPPF and with CP50, applications must ensure that no net loss of functional habitat for the benefit of wildlife in the local area will occur as a result of the proposed

development. Given the presence of roosting bats and surrounding suitable (dark) habitats, **a lighting condition has been recommended to manage any residual risk to light-sensitive species**. In addition, gains for biodiversity, relevant to local habitats and wildlife populations, should form part of the proposed development. The EclA report recommends the installation of three bat boxes, and two new crevice features on the northern elevations of the extended structure. **Biodiversity enhancements, including the new bat roosting opportunities, should be secured via a condition.**

Biodiversity Net Gain

A completed statutory metric calculation and map (*Biodiversity Net Gain Statement, Providence Ecological, December 2025; Statutory Biodiversity Metric, Alex Sams, December 2021*) confirming 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	3.44-5.48 Habitat units
	0.84-1.28 Hedgerow units
	0.00 Watercourse units
Are there any irreplaceable habitats on-site?	No
Has any habitat degradation of occurred?	No

Thank you for providing the condition assessment sheets. However, the condition assessments for the individual trees are missing/blank. These will need to be provided in support of the pre-development baseline, prior to the determination of the application.

Thank you for submission of the tree condition assessments, which appear to align with the BNG metric baseline entries.

Additionally, the redline boundary used for the BNG assessment is different from the redline boundary shown on other documents such as the Location Plan. Whilst it is acknowledged that the plot to the south is subject only to a “change of use” aspect of the proposal, the redline application boundary and site boundary used for the BNG assessment must match.

The BNG metric and report have been updated to include all areas within the redline boundary, in line with the BNG User Guide/guidelines. This has altered the baseline (as shown in the table above). Nonetheless, it is still proposed to achieve BNG on-site (in excess of the mandatory 10% gain) via the creation of habitats such as other neutral grassland, trees and hedgerow. The habitat proposals are welcomed.

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. A compliance condition should be applied to include the relevant BNG proposals/documents.

DRAFT CONDITIONS:

1. Compliance with submitted documents

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

- Preliminary Ecological Appraisal, Providence Ecological, June 2025
- Ecological Impact Assessment, Providence Ecological, November 2025
- Biodiversity Net Gain Statement, Providence Ecological, June 2026

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

2. 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 sensitive 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 wildlife-sensitive habitats, including habitat used by bats.

3. Enhancements for Biodiversity

Prior to the commencement of any works, including vegetation removal and demolition, details of the number, design and locations of ecological enhancements – such as bat roosts and nesting opportunities for birds – shall be submitted to the local authority for approval. Development shall be carried out in strict accordance with the approved enhancement plan.

REASON: To provide mitigation/enhancement for biodiversity.

Informative – Bats

The Three Daggers farm shop is used as a bat roost. Under the Conservation of Habitats and Species Regulations 2017 (as amended), it is an offence to harm or disturb bats or damage or destroy their roosts. Planning permission for development does not provide a defence against prosecution under this legislation. The applicant is advised that a European Protected Species Licence will be required before any work is undertaken to implement this planning permission. Future conversion of a roof space to living accommodation or replacing a roof could also breach this legislation and advice should be obtained from a professional bat ecologist before proceeding with work of this nature.

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

Ecologist Abi Gazzard	Date 23/07/2026
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