

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jessica Cracknell
Date:	19/01/2026 03/08/2026 updated comments
Application Number:	PL/2025/09850
Proposal:	Erection of replacement clubhouse, replacement of reception building and erection of sauna after demolition of toilet/shower/pot wash building.
Site Address:	Blackberries Camping Park, Farleigh Rise, Monkton Farleigh, Bradford On Avon, BA15 2DY
Case Officer:	Steven Sims

Recommendations:

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

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date submitted)
1	Bath and Bradford Bats SAC	Habs Regs, WCA, NPPF, CP50	19/01/2026 Assessment of the impacts of Bats in relation to Bath and Bradford-on-Avon Bats SAC Surveys required to establish the likely impacts on Annex II bats, including potential effects on key foraging and commuting routes.	YES 03/08/2026 - Preliminary Ecological Appraisal & Preliminary Roost Assessment. 17 April 2026. Arbtech; - Habitat Regulations Assessment. 21 April 2026. Arbtech.
2	Bats/Lighting	Habs Regs, NPPF 2024, CP50	19/01/2026 03/08/2026 A review of proposed artificial lighting to reduce impacts on important bat habitat (trees, woodland). A plan with dark corridors along key bat habitat/ corridors clearly identified. (see comments in main text)	NO
3	Ecological Impact Assessment (EcIA)	Habs Regs, WCA, NPPF, CP50	19/01/2026 An Ecological Assessment has not been submitted in support of this application, assessing the potential impacts on protected habitats and	YES 03/08/2026 Preliminary Ecological Appraisal & Preliminary Roost

			species, including Priority Habitat Deciduous Woodland and Annex II bats associated with the Bats SAC.	Assessment. 17 April 2026. Arbtech.
4	Biodiversity Net Gain (BNG)	Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021)	19/01/2026 Clarification of BNG Exemption: The proposals must demonstrate that there will be no loss of integrity of trees or priority woodland habitats	YES 03/08/2026 • BNG Exemption Statement. 21 April 2026. Arbtech

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.

The following submitted documentation was reviewed to inform this response:

- [Preliminary Ecological Appraisal & Preliminary Roost Assessment. 17 April 2026. Arbtech;](#)
- [Habitat Regulations Assessment. 21 April 2026. Arbtech;](#)
- [BNG Exemption Statement. 21 April 2026. Arbtech;](#)
- GU10SPIKEBK. Knightsbridge. 230V IP65 GU10 Spike Light Black;
- Site Plan. November 2022. Willis & Co. Drawing No. JN-JH-02;
- Plans as Proposed. November 2025. Willis & Co. Drawing No. JN-JH-04;
- Plans as Existing. November 2025. Willis & Co. Drawing No. JN-JH-03;
- Location Plan. November 2022. Willis & Co. Drawing No. JN-JH-01.

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

The site lies within a consultation zone for Bechstein's bats, Greater Horseshoe bats and Lesser Horseshoe bats, associated with the Bath and Bradford-on-Avon Bats SAC. The proposal therefore has 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.

The Preliminary Ecological Appraisal (PEA) identifies that the site supports woodland, scrub, scattered trees and modified grassland, including areas of Priority Habitat Deciduous Woodland. These habitats provide potential commuting and foraging opportunities for bats and may function as supporting habitat for qualifying SAC species. The proposed development must ensure that key habitat features are retained and that any loss is mitigated through habitat creation and management, with measures to maintain ecological connectivity for bats. Retained habitat across the site must be buffered and enhanced where possible to reduce fragmentation and support bat movement. The PEA also identified a confirmed bat roost within the retained WWII pillbox, with evidence suggesting historical use by lesser horseshoe bat, a qualifying species of the SAC. Whilst the proposed development would largely be confined to previously developed areas, and the confirmed roost will not be impacted as part of the development proposals, the introduction of external lighting creates a potential impact pathway through disturbance of commuting and foraging bats using retained woodland, scrub and boundary habitats.

Whilst a lighting installation location plan has been submitted, insufficient information has been provided to demonstrate that all sensitive ecological features, including woodland edges, scrub, boundary vegetation and

potential bat commuting corridors, will remain below 0.5 lux. The submitted information does not include a detailed lux contour plan showing light spill across all retained ecological features, nor does it identify the extent of dark buffer zones between illuminated areas and retained bat habitat. To ensure ecological functionality for foraging and commuting bats is retained it is expected that an undeveloped continuous dark corridor is provided along key bat habitat. The new lighting scheme must be in line with the bats SAC guidance. Please see lighting section below for further information.

Insufficient information has so far been submitted to enable the AA to be undertaken, which must be completed and the conclusion agreed with Natural England prior to the application being determined. ~~No bat activity surveys or ecological surveys have been undertaken to assess the sites potential for foraging and commuting use. No assessment of the impacts upon the SAC have been considered. The applicant is advised to engage a suitably qualified bat ecologist to undertake surveys in accordance with current Bat Conservation Trust guidelines. In the absence of survey data, it must be assumed that Annex II bats associated with the SAC are utilising these habitats for both commuting and foraging. Any potential habitat loss or disturbance must therefore be fully assessed. The results should demonstrate that sufficient and proportionate mitigation will be delivered, with monitoring to be secured as necessary, in line with BNG requirements and the conservation objectives of the Bats SAC.~~

Further information in relation to the Bath and Bradford Bats SAC requirements can be found here:

[Bat SAC Developers Guidance inc Bath Bradford on Avon Chilmark and Mottisfont](#)

Priority Habitat Deciduous Woodland

Priority habitat woodland sits within the redline boundary of the site. This deciduous woodland is functionally linked to Ashely Wood Ancient Woodland and Brown's Folly SSSI associated with the Bath and Bradford-on-Avon Bats SAC to the north of the site through a network of woodland and hedgerows. The existing landscaping has the potential to support a number of protected species, including dormice, and is a known foraging and commuting route for bats and a local resource for those roosting on site. Wiltshire Core Strategy Core Policy 50 states *"All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development"*. In accordance with Core Policy 50, development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term.

~~Further information is required to confirm whether any works are proposed in close proximity to the priority habitat deciduous woodland and to demonstrate how woodland trees and habitats would be protected.~~ As outlined within the provided Preliminary Ecological Appraisal & Preliminary Roost Assessment, no development works, vegetation clearance, or ground disturbance are proposed within the priority woodland habitat. The woodland and associated boundary vegetation will be retained in situ and protected throughout the construction phase. Given the proximity of the development to sensitive receptors, there is potential for adverse effects arising from construction-related activities. Appropriate protection measures will be secured through the implementation of a Construction Environmental Management Plan (CEMP). This should include clear avoidance and protection measures to ensure no loss or degradation of the woodland during construction and subsequent occupation. ~~Additional information is required to ensure native boundary features and habitats are retained and protected during construction to ensure the existing features for bats are retained as in accordance with core policy 50, no net loss.~~ A tree root protection zone of at least 15m should also be maintained for priority woodland habitat to avoid degradation of roosting and foraging resources. Should proposals change such that tree or scrub removal within or adjacent to the woodland is required, further surveys would be necessary and mitigation measures would need to be reviewed and revised accordingly.

Protected Habitats and Species

~~No ecological information has been submitted in support of the application and therefore insufficient information to determine potential impacts on habitats and protected/ notable species has been provided. Should any be identified, additional information will be required to support the application including an impact assessment and where appropriate, avoidance and/or mitigation measures to minimise those impacts. 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 must therefore be submitted and reviewed by the LPA's ecology team prior to determination of the application.~~

Nesting Birds

Where possible, vegetation removal should be scheduled outside the bird breeding season (1st March–31st August) to avoid potential disturbance. If removal during this period is unavoidable, a pre-works nesting bird inspection must be conducted no more than two weeks before vegetation clearance begins. 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. Damage to extensive areas that could contain nests/breeding birds should be undertaken outside the breeding season.

Great Crested Newts (GCN) and Reptiles

The habitats within the proposed development area provide suitable terrestrial habitat, therefore, the potential for impacts on amphibians, cannot be ruled out. A precautionary method of working must be undertaken including a sensitive (phased) vegetation clearance methodology between the months of April and October. Reasonable avoidance measures should be included within a construction environmental management plan (CEMP) which can be secured by condition.

Badgers

Historical evidence of badger activity has been recorded within the Site, including a sett located within the southeast section of the woodland onsite. No signs of badger activity were identified during the updated 2026 site survey; however, the Site is considered to be of ecological value for badger. Any identified badger setts must be retained within the development proposals wherever possible, with a minimum 30m buffer from built form or construction activities. Where retention is not feasible, any active setts impacted by the scheme must be closed under a Natural England licence, following best practice protocols. Additional precautionary measures can be secured via a construction environmental management plan (CEMP).

Lighting

Some of the proposed lighting is close proximity to priority habitat deciduous woodland. The installation of these lights has the potential to impact trees associated with such woodlands. **The submitted information does not demonstrate that all sensitive ecological features, including boundary hedgerows, woodland edges, and potential commuting corridors will remain at ≤ 0.5 lux, with no dark buffer zones identified.**

An increase in artificial lux levels can deter bats which could result in roost abandonment and/or the severance of key foraging areas. This will likely result in a significant negative impact upon the health of bat populations across the region. Artificial light at night can have a substantial adverse effect on biodiversity. Any new lighting should be for the purposes for safe access and security and there is an expectation that all lighting provided on site would be in accordance with the appropriate Environmental Zone standards set out by the Institute of Lighting Engineers in their publication GN01:2021, 'Guidance for the Reduction of Obtrusive Light' (ILP, 2021), and Guidance note GN08/23 "Bats and artificial lighting at night", issued by the Bat Conservation Trust and Institution of Lighting Professionals.

A lighting plan that includes a Lux Plot, must be submitted to the LPA for approval. The plan will demonstrate that bat habitat (trees, scrub and hedgerows) on the perimeter of the site will remain below 0.5 lux. Dark buffers are not specified (m) on the plans or reports therefore the application does not demonstrate that they will be adequately buffered from the development to ensure functionality will be maintained. To ensure ecological functionality for foraging and commuting bats is retained it is expected that an undeveloped continuous dark corridor is provided along key bat habitat.

Biodiversity Net Gain (BNG)

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 the development meets the following criteria and is therefore below the de minimis threshold, meaning the development:

- does not impact an onsite priority habitat (a habitat specified in a list published under section 41 of the Natural Environment and Rural Communities Act 2006); and
- impacts less than 25 square metres of onsite habitat that has biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat (as defined in the statutory metric).

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.

~~This exemption does not apply where developments are impacting priority habitat, further clarification is required to determine whether any priority habitat identified within the site will be impacted by the development proposals. The proposals must demonstrate that there will be no loss of integrity of trees or priority woodland habitats.~~

Core Policy 50

Core Policy 50 of the Wiltshire Core Strategy requires all development to demonstrate:

- No net loss of local biodiversity resource and
- Secure the integrity of local ecological networks

Core Policy 50 of the Wiltshire Core Strategy requires all development to demonstrate no net loss of biodiversity and to seek opportunities to enhance biodiversity. The NPPF also encourages applications to deliver measurable net gains (para 186 d). It is anticipated that all developments will deliver no net loss of biodiversity. For this application, biodiversity measures should focus on delivering continued ecological functionality for birds, bats, and hedgehogs.

Integrated features are generally maintenance-free and seek to benefit a target species/s or group/s and should demonstrate viability in terms of position on the building, location and clustering in accordance with relevant guidance and the additional features. Locations should be chosen in consultation with a professional ecologist to ensure they are appropriately positioned, and the following details must be provided: location, number, type (include make/model, if appropriate) and positioning (height, aspect, surrounding habitat, as applicable). Ecological enhancements are provided through the installation of bird boxes and bat boxes, within the Preliminary Ecological Appraisal & Preliminary Roost Assessment. The location of ecological/biodiversity enhancements must be included in the site plan drawings (see condition below) and will become an enforceable part of the planning permission. Bird/bat boxes will continue to be available for bats/birds for the lifetime of the development.

~~Insufficient information to demonstrate no net loss of the local biodiversity resource has been submitted. Evidence demonstrating no net loss of local biodiversity resource and that the integrity of ecological networks must be submitted and reviewed by the LPA's ecology team prior to a planning permission being given.—~~

~~Insufficient information has been submitted. 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 must therefore be submitted and reviewed by the LPA's ecology team prior to determination of the application. I therefore maintain a holding objection until all the issues listed above have been suitably addressed.~~

CONDITIONS: these will be added once the issues above have been addressed

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

Ecologist	Date