

Council Planning Consultation Response

ECOLOGY

Officer name:	Elizabeth Burrows, Senior Ecologist
Date:	16/02/2026, 06/08/2026 (red text)
Application No:	PL/2025/07781
Proposal:	Proposed Glamping Pods (4 No.)
Site Address:	Home Farm, Rood Ashton, West Ashton, Trowbridge, BA14 6BL
Case Officer:	Andrew Thomas

Recommendations:

☐	No Comment
☐	Support
☐	No objection
☒	Condition (no objection subject to conditions)
☐	Objection - further information required
☐	Objection in principle
☒	HRA completed – Bath and Bradford on Avon Bat SAC

The AA has been sent to Natural England (06/08/2026), who must agree the conclusion (within 21 days) prior to this application being permitted.

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date submitted)
1	Bath and Bradford on Avon Bat SAC	Habitats Regulations, CP50, NPPF	Bat Mitigation Scheme TWBMS contributions: Grey hatched recreation pressure zone £3,700 (£925 per cabin). Yellow Zone habitat mitigation £3,888.12 (£972.03 per cabin)	Yes Site Plan – Proposed. LCP 5894 PR101 A. (LPC, June 2025). Preliminary Ecological Appraisal. (Herdwick Ecology, July 2025, updated March 2026).
2	Priority Habitat Deciduous Woodland	CP50, NPPF	Wildlife mitigation and enhancement plan/ or alternative	Yes Preliminary Ecological Appraisal. (Herdwick Ecology, July 2025, updated March 2026).

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:

- Proposed Glamping Pods On Land at Home Farm, Rood Ashton, Trowbridge, Wiltshire, BA14 6BL. (IPC Town and Country Planning Development Consultants, September 2025).

- ~~Pod Plan and Elevations. Drawing Number LPC 5894 PR 102 A. (IPC Town and Country Planning Development Consultants, October 2024).~~
- ~~Location Plan. Drawing Number LPC 5894 EX 101 A. (IPC Town and Country Planning Development Consultants, June 2025).~~
- ~~Preliminary Ecological Appraisal. (Herdwick Ecology, July 2025).~~
 - Site Plan – Proposed. LCP 5894 PR101 A. (LPC, June 2025).
 - Preliminary Ecological Appraisal. (Herdwick Ecology, July 2025, updated March 2026).
 - Location Plan. Drawing Number LPC 5894 EX 101 B. (IPC Town and Country Planning Development Consultants, June 2025).
- Pod Plan and Elevations. Drawing Number LPC 5894 PR 102 A. (IPC Town and Country Planning Development Consultants, October 2024).
- Biodiversity Net Gain Report. (Herdwick Ecology, March 2026 Update).

COMMENTS:

I have been advised by the Case Officer and the applicant's ecologist that the layout is being revised; therefore, it is not appropriate to provide detailed comments on the submitted plans as they are to be superseded. The comments below are provided in anticipation of amendments to the layout and highlight the key ecological constraints and the mitigation measures that will need to be addressed.

Please reconsult Ecology once the revised plans have been submitted.

The Preliminary Ecological Appraisal identifies the affected habitats as modified grassland of low ecological value and considers significant impacts on protected species, other than bats, to be unlikely. The site does lie adjacent to habitat functionally linked to areas of high bat value, including qualifying species of the Bath and Bradford on Avon Bat SAC.

In the absence of detailed bat activity surveys, the existing woodland, tree scrub and connecting grassland must be treated as core bat habitat under the TWBMS, and precautionary mitigation must ensure no net loss of bat foraging or commuting habitat is required.

The applicant must also address the issues raised in Natural England's response.

Habitats Regulation Assessment (HRA)

Salisbury Plain SPA

This application lies within the 6.4km zone of influence of the Salisbury Plain SPA and in light of the HRA for the Wiltshire Core Strategy and the HRA for the Wiltshire Housing Site Allocations Plan it is screened into Appropriate Assessment due to the potential impact of recreational pressure on stone curlew in combination with other plans and projects.

A strategic Appropriate Assessment (AA) has been prepared pertaining to development within the 6.4km zone of influence that could result in a likely significant effect on the SPA as a result of an increase in recreational / visitor pressure. The AA reached a conclusion of no adverse effects on the integrity of the SPA or its qualifying features provided that the council's mitigation strategy continues to be implemented. Annual stone curlew monitoring and protection measures continue to be secured by the Council.

In January 2026 Natural England (NE) confirmed that the 2026 strategic AA for Salisbury Plain SPA continues to be supported by NE.

Bath & Bradford on Avon Bats SAC

The application site is within multiple consultation zones 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.

The application site is located within the 'grey hatched' recreational 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) due to increased recreational impact on woodland habitats known to support SAC qualifying species of bat.

~~New residential development proposals within the grey hatched medium recreational risk zone will be expected to provide a financial contribution of £925 per dwelling towards the council's strategic recreational pressure mitigation scheme. This is to be secured via section 106 agreement (s106), a section 111 (s111) agreement or unilateral undertaking (UU) (legal fees will apply).~~ **The development does not include residential dwellings, is only for four cabins and there are recreational opportunities within the immediate vicinity. Recreational impacts on the woodland habitats are not expected.**

The application site is located within the yellow medium risk zone of the Trowbridge & Westbury Bat Mitigation Strategy (TWBMS). The yellow medium risk zone represents the areas where habitat has been shown to be of importance, or is highly likely to be of importance for bats associated with the Bath and Bradford-on-Avon Bat SAC, and in particular the yellow zone takes into consideration the foraging areas and flightlines of horseshoe species 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.

Given the low level of impact these payments are not required, please refer to text below and Appropriate Assessment.

All greenfield site residential apps within this zone are subject to S106 contributions as follows:

~~Each dwelling contributes £972.03 per dwelling (index linked from 2018) to be paid before commencement towards habitat mitigation detailed in Section 9 of the TWBMS.~~

The cost of mitigation via the Council's strategic Trowbridge and Westbury Bat Mitigation Strategy would be:

Grey hatched recreation pressure zone £3,700 (£925 per dwelling cabin).

Yellow Zone habitat mitigation £3,888.12 (£972.03 per cabin)

~~The mitigation is required prior to the commencement of development and must be secured by planning obligations.~~

~~Where a Section 106 agreement is not in place, mitigation can alternatively be secured under Section 111. Where the applicant elects to use a S111, the strategic mitigation must be secured upon the granting of planning permission by completion of S111 process.~~

The site and adjacent habitats (woodland and tree belts) are very likely to be of high value for foraging and commuting bat SAC qualifying species due to their location within a Bechstein's bat 1.5 km Core Roost Buffer (approximately 770 m from Biss Wood, which supports a Bechstein's bat maternity colony), within 560 m of a known lesser horseshoe bat maternity roost, and directly adjoining high-quality foraging and commuting habitat.

The introduction of human disturbance, including but not exclusively artificial lighting and recreational activity, has the potential to result in the loss or degradation of foraging and commuting habitat used by qualifying SAC bat species.

In the absence of detailed bat activity surveys, the existing woodland and tree scrub must be treated as core bat habitat (as defined by the TWBMS) and the precautionary principle should therefore be applied to ensure no net loss of bat foraging and commuting habitat. **A bat mitigation scheme demonstrating that the**

development would not result in adverse impact on the foraging and commuting functionality of these habitats is required.

The scheme must include a plan showing how existing bat habitat will be buffered from the development and how connectivity across the site to habitats and features in the wider landscape will be maintained in accordance with the TWBMS. The buffers must be in broad accordance with Figure 6 of the TWBMS, proportionate to the development impacts and managed to benefit bats. The plan must clearly specify the location, extent, and environmental requirements of these buffers.

The Preliminary Ecological Assessment has been updated to include mitigation for impacts on bat habitat. The submitted Site Plan – Proposed (LPC, June 2025) provides the recommended 10m dark corridor and new native hedgerow planting linking the woodland blocks to the east and west. Subject to appropriate management, these measures will provide bat foraging and commuting habitat, buffer existing woodland from disturbance, and enhance ecological connectivity across the site. The long-term management of the woodland buffers and native hedgerow must therefore be secured through the recommended Wildlife Mitigation and Enhancement Plan condition.

If lighting is proposed a sensitive lighting strategy to demonstrate that there will be no increase in lighting, including from within the glamping pods must be submitted or required by condition.

The Pod Plan and Elevations demonstrate minimal fenestration on elevations facing the woodland and proposed native hedgerow to the south. No external lighting is shown on the submitted plans and it is therefore assumed that none is proposed. To safeguard bat habitat and maintain the integrity of the dark corridor, the installation of external lighting must be controlled by condition.

Overall given the scale of the development and assuming the mitigation is secured impacts on the Bath and Bradford on Avon Bat SAC is not predicted (please refer to Appropriate Assessment).

The application has potential to result in significant adverse impact either alone or in combination with other projects on the statutorily designated (Bath and Bradford on Avon Bat SAC). As required by the Conservation of Habitats and Species Regulations 2017 (as amended) an Appropriate Assessment has been completed by the LPA with a favourable conclusion.

Priority Habitat (Deciduous woodland)

Kennel Wood lies adjacent to the site and is mapped as Priority Habitat Deciduous woodland. The introduction of human disturbance, including but not exclusively artificial lighting and recreational activity, has the potential to result in the loss or degradation of this woodland.

Mitigation that ensures no adverse impact on this habitat must be provided. It would be acceptable for this mitigation to be specified on the requested bat mitigation scheme.

Habitat creation and enhancement measures that improve connectivity between existing woodland and tree belts and other measure that seeks to deliver biodiversity enhancement as recommended in the PEA would be welcomed. It would be acceptable for these measures to be shown on the requested bat mitigation scheme or separate wildlife mitigation and enhancement plan.

Mitigation to ensure no adverse mitigation on deciduous woodland is provided.

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.

Text that is no longer relevant and has been removed for brevity, please refer to previous consultation response if reference to this is required.

A completed statutory metric calculation (Biodiversity Net Gain Metric Calculation, submitted May 2026) confirming the baseline and predicted post- development biodiversity units of the site has been submitted (with maps in the Biodiversity Net Gain Report).

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	2.60 Habitat units
	0.00 Hedgerow units
	0.00 Watercourse units
Are there any <u>irreplaceable</u> habitats on-site?	No
Has any habitat <u>degradation</u> of occurred?	No

Note: The LNRS has been published since the metric was submission. Strategic significance must be updated to reflect the priorities of the LNRS in order to discharge the BGP.

DRAFT CONDITIONS:]

Compliance with Submitted Documents

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

- Site Plan – Proposed. LCP 5894 PR101 A. (LPC, June 2025).
- Location Plan. Drawing Number LPC 5894 EX 101 B. (IPC Town and Country Planning Development Consultants, June 2025).
- Pod Plan and Elevations. Drawing Number LPC 5894 PR 102 A. (IPC Town and Country Planning Development Consultants, October 2024).
- Sections 5.1 – 5.1 and Plate 2 of the Biodiversity Net Gain Report. (Herdwick Ecology, March 2026 Update).

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

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 bat 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 habitat used by bats and to ensure lighting meets the requirements of the Trowbridge Bat Mitigation Strategy and the Habitat Regulations Assessment

Wildlife Mitigation and Enhancement Plan

Prior to the start of construction, a Wildlife Mitigation and Enhancement Plan shall be submitted to and approved in writing by the Local Planning Authority. The plan will specify long term objectives for each ecological feature (woodland buffers, native hedge and grassland) to benefit biodiversity specifically bats along with planting specifications and management schedules required to the stated objectives.

The Wildlife Mitigation and Enhancement Plan shall be implemented in full and for the lifetime of the development in accordance with the approved details.

REASON:

To ensure the long-term management of ecological features retained and created by the development, for the benefit of biodiversity for the lifetime of the scheme.

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Informative:

General Protected Species

The applicant should note that under the terms of the Wildlife and Countryside Act (1981) and the Conservation of Habitats and Species Regulations 2017 (as amended) it is an offence to disturb or harm any protected species including for example, breeding birds and reptiles. The protection offered to some species such as bats, extends beyond the individual animals to the places they use for shelter or resting. Please note that this consent does not override the statutory protection afforded to any such species. In the event that your proposals could potentially affect a protected species you should seek the advice of a suitably qualified and experienced ecologist and consider the need for a licence from Natural England prior to commencing works. Please see Natural England’s website for further information on protected species.

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

Ecologist	Date
Elizabeth Burrows	06/08/2026