

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	26/01/2026, 06/08/2026
Application number:	PL/2025/09842
Proposal:	The conversion of existing stable and erection of a new building to form a self-build dwelling.
Site address:	Stables at Palmers Close, Trowbridge Road, Hilperton, BA14 7QQ
Case officer:	Steven Sims

Recommendations:

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

Appropriate Assessment regarding the Bath and Bradford-on-Avon bat SAC and TWBMS has been sent to Natural England (26/01/2026), who must agree with the conclusion on 30/01/2026.

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:

- Preliminary Ecological Appraisal and Bat Survey Report, Stark Ecology Ltd, December 2025
- Site Plan – Proposed, Tea Architects, 17/12/2025
- Roof Plan – Proposed, Tea Architects, 17/12/2025
- East and West Elevations – Proposed, Tea Architects, 17/12/2025
- North and South Elevations – Proposed, Tea Architects, 17/12/2025
- Site Plan – Proposed, Tea Architects, 15/06/2026
- East and West Elevations – Proposed, Tea Architects, 15/06/2026
- Roof Plan – Proposed, Tea Architects, 15/06/2026
- North and South Elevations – Proposed, Tea Architects, 15/06/2026

The site comprises an open-fronted barn and stables proposed for conversion and extension into a dwelling. It is neighboured by a residential area to the northeast, with grassland fields to the south and west. The fields are enclosed by further residential areas.

Thank you for re-consulting Ecology; my second comments are shown in blue. The plans have been amended to primarily reduce the proposed building height. The addition of increased planting shown on the proposed site plan is welcomed. However, the biodiversity enhancements are no longer shown on the plans; these must be added to ensure a compliance condition can be used.

COMMENTS:

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

The application site is located within the **grey** and **yellow** zones of the Trowbridge & Westbury Bat Mitigation Strategy (TWBMS), associated with the Bath & Bradford on Avon Bats Special Area of Conservation (SAC). The site is also within a core roost buffer (associated with the bat SAC) for a Bechstein's bat maternity roost (~1km southeast). Therefore, the plans have the potential to result in significant adverse impact on the special features of the 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. At the current site, it is only the section of existing road at the western border that falls within the yellow zone. **As such, there will be no loss of bat habitat within the yellow risk zone, and the yellow zone is not considered further.**

The grey medium risk zone represents an area where new residential development is likely to result in increased recreational use of important woodland bat sites. In order to conclude the AA favourably, new residential development proposals for 49 dwellings or less 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 detailed in section 9.2 of the TWBMS.

For this development, the cost of mitigation via the Council's strategic scheme would be £925 for the 1 dwelling. 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.

Overall, the AA concludes no adverse effects on the SAC site, **subject to the contribution listed above as well as conditions securing mitigation including sensitive lighting and a replacement roost.** This AA has been sent to Natural England (26/01/2026) and the application must not be determined until they have agreed with the LPA's conclusion.

Bat surveys

The open-fronted barn at the south of the site was concluded as having negligible potential to support roosting bats. Conversely, although no evidence of roosting bats was observed, several potential roosting features were noted on the stables. The stables were, overall, assessed as having high potential to host roosting bats, and were subject to three emergence surveys between July-September 2025. No bats were recorded emerging from the building. Some passes and foraging activity by Lesser Horseshoe and unidentified *Myotis* bats were recorded, albeit limited.

A static detector was deployed for four nights of monitoring in September 2025, after it was found that the barn door was now open, allowing bats to fly through the open doorway. Greater Horseshoe bats were recorded on 3 out of 4 nights several hours away from sunset/sunrise, indicating potential use as a night roost or feeding perch. Social calls of Brown Long-eared bats were also recorded within the stables.

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 ecology report states that a bat loft will be created in the garden store to the north of the site, as marked on Figure 9 of the report. This compensation is considered acceptable given that (i) no activity within the building was recorded during the emergence surveys; (ii) bat activity (low level) was only recorded after the door had been blown open, i.e., the stables were not used previously as a permanent a roosting structure, and (iii) further enhancement for bats will be secured through the proposed tree and hedgerow plantings. The mitigation detailed in the report must be adhered to (including measures to reduce accessibility of the building to bats prior to works commencing, and monitoring potential presence with a static recorder). The proposed bat loft will be 2.8m by 3.8m in width and length, and 2.5m in height to the ridge. The bat access tunnel is indicated on the roof plans and northern elevation plans. **Compliance with these plans, and said mitigation, should be secured via a condition.**

The bat features are not shown on the amended plans. These must be added back in, to ensure mitigation is enforceable and can be secured through a compliance condition.

Other protected and notable species

The site could be used by badgers and hedgehogs. Therefore, the ecology report recommends measures to avoid adversely affected these species, such as the covering of any trenches left overnight. These recommendations should be adhered to.

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.

In line with the NPPF and with CP50, gains for biodiversity, relevant to local habitats and wildlife populations, should form part of the proposed development. **Three swift boxes, two house martin nests and new hedgerow are shown in the site plans (as well as the bat loft and bat access feature); these should be secured via a compliance condition.** The new plantings should be native-species and pollinator-friendly.

As above, the enhancement features are not shown on the amended plans. These must be added back in, to ensure mitigation and compensation is enforceable and can be secured through a compliance condition.

Biodiversity Net Gain

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 it is for self and Custom Build Development, meaning development which:

- consists of no more than 9 dwellings;
- is carried out on a site which has an area no larger than 0.5 hectares; and
- consists exclusively of dwellings which are self-build or custom housebuilding (as defined in section 1(A1) of the Self-build and Custom Housebuilding Act 2015), as indicated in the Planning Statement.

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.

IN SUMMARY:

S106 requirements

1. £925.00 per dwelling to contribute towards the council's strategic recreational pressure mitigation scheme

Conditions:

1. Compliance with submitted documents

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

- 'Discussion and Conclusions' section of the Preliminary Ecological Appraisal and Bat Survey Report, Stark Ecology Ltd, December 2025 (including details of the bat loft, as marked on Figure 9)
- Bat roosting and bird nesting features, and new plantings, shown on: (PLANS REQUIRE UPDATING)
 - o Site Plan – Proposed, Tea Architects, 17/12/2025
 - o Roof Plan – Proposed, Tea Architects, 17/12/2025
 - o East and West Elevations – Proposed, Tea Architects, 17/12/2025
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REASON: For the avoidance of doubt and for the protection, mitigation and enhancement of biodiversity.

2. Artificial Lighting

No external lighting shall be installed on site until plans showing the type of light appliance, the height and position of fitting, illumination levels and light spillage have been submitted to and approved in writing by the Local Planning Authority. 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. The approved lighting shall be installed and maintained in accordance with the approved details and no additional external lighting shall be installed.

REASON: In the interests of the amenities of the area, to minimise unnecessary light spillage above and outside the development site and to ensure lighting meets the requirements of the Trowbridge & Westbury Bat Mitigation Strategy.

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

Ecologist Abi Gazzard	Date
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