

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jessica Cracknell
Date:	15/05/2026 11/08/2026 updated comments
Application Number:	PL/2026/00168
Proposal:	Change of use of Hazelbury Manor (Grade I listed), Dower House (Grade I listed) and The Granary (Grade II listed) from mixed used, residential (C3) and agricultural, to hotel use (C1) with ancillary parking.
Site Address:	Hazelbury Manor, Bradford Road, Hawthorn, Corsham, SN13 8HX
Case Officer:	Lucie Turner

Recommendations:

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

An Appropriate Assessment for impacts on the Bath and Bradford on Avon Bats SAC has been completed and sent to Natural England for their agreement that the HRA can be favourably concluded. There is a statutory 21-day response window. The application must not be approved until NE have endorsed the conclusion of the AA.

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date submitted)
1	Biodiversity Net Gain (BNG)	Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021)	15/05/2026 Submission of statutory metric calculation with the correct baseline habitats, redline boundary and associated plans and condition assessment sheets.	YES 11/08/2026 Clarification of proposed works and exemption from BNG (see email dated 11 August 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.

The following submitted documentation was reviewed to inform this response:

- Shadow Habitat Regulations Assessment. June 2026. Ethos Environmental Planning. Project No. ETH26-357;
- RE: Hazelbury Manor HRA. 30 July 2025. Ethos Environmental Planning;
- Ecological Impact Assessment. 12 March 2026. BSG Ecology. Project No. P25-359;
- Preliminary Ecological Appraisal. 15 August 2025. BSG Ecology. Project No. P25-359;
- Biodiversity Net Gain Assessment. 12 March 2025. BSG Ecology. Project No. P25-359;
- The Statutory Biodiversity Metric. 09 January 2026;
- Figure 1: Baseline Habitats. 09 January 2026. BSG Ecology. Job Ref. P25-359. Version. 1.2;
- Figure 2: Proposed Habitats. 09 January 2026. BSG Ecology. Job Ref. P25-359. Version. 1.2;
- Statutory_Biodiversity_Metric_Condition_Assessments_-_July_2025 – Hazelbury. 26 June 2025. 30 July 2025. 10 December 2025;
- Proposed Site Plan. 08 January 2026. Yiangou Architects. Drawing No. 2956-055. Rev. H;
- Proposed Granary Plans and Elevations. 15 December 2025. Yiangou Architects. Drawing No. 2956-2050. Rev. P8;
- Site Location Plan. 09 January 2026. Yiangou Architects. Drawing No. 2956-0010. Rev. P7;
- Existing Granary Plans and Elevations. 04 November 2025. Yiangou Architects. Drawing No. 2956-2000. Rev. P1;
- Planning Statement. January 2026. Rural Solutions.

Following communication with the case officer, it has been confirmed that this application relates solely to a change of use, with no internal or external alterations proposed as part of the development, despite the inclusion of documents referring to such works. This consultation response has therefore been based on the change of use of Hazelbury Manor, Bradford Road, Hawthorn, Corsham, SN13 8HX only. **Should any works be proposed that involve alterations to the buildings (internal or external) or affect habitats and species identified within the site, the Council's ecology team must be reconsulted.**

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

The application site is located within a consultation zone for Greater Horseshoe bats, Lesser Horseshoe bats and Bechstein's bats associated with the Bath and 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 site lies within a sensitive core sustenance zone for Annex II bat species and supports habitats suitable for roosting, foraging, and commuting. Submitted plans and reports identify the presence of bat roosts within the on-site buildings, confirm use of the site by bats, and reference internal and external works, however, it has been clarified that the current proposal relates solely to a change of use. The assessment has therefore been undertaken on this basis. **Any future amendments to the proposals, particularly those involving works to buildings or habitats with potential to support Annex II bats, will require further ecological survey, a review of mitigation and management measures, and will be subject to reassessment under the Habitats Regulations.**

The roof space of Hazelbury Manor, Bradford Road, Hawthorn, Corsham, SN13 8HX is used as a bat roost. Under the Conservation of Habitat Regulations, 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 Natural England licence would be required if any works are to affect the identified roosts before any work is undertaken to implement this planning permission.

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. The AA has been sent to Natural England (11/08/2026) and the application must not be determined until they have agreed with the LPAs conclusion.

Any future proposals, works or applications for this site must provide sufficient information relating to direct and indirect impacts on bat species, including Annex II bats associated with the Bath and Bradford-on-Avon Bats SAC, assessment of both direct and indirect impacts, and any potential effects on Box Mine SSSI.

Box Mine SSSI

The LPA have a duty to consult NE prior to determining a planning application that is in or likely to affect a SSSI (Schedule 4 (w) of The Town and Country Planning (Development Management Procedure) (England) Order 2015 and section 28i of The Wildlife and Countryside Act 1981).

This application lies within Box Mine Site of Special Scientific Interest (SSSI). Given the scale and nature of the proposed works, which comprises a change of use only with no internal or external alterations to the buildings and no works proposed adjacent or within the SSSI, it is concluded that there is no mechanism for potential effect.

Please note that the developer has a responsibility to protect the qualifying features of this site and must seek approval (assent) from Natural England prior to carrying out any works likely to damage the qualifying features of sites special scientific interest. Further advice can be found here: [Sites of special scientific interest: public body responsibilities - GOV.UK](#)

Priority Habitat Traditional Orchard

Priority Habitat Traditional Orchard lies within the site. 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. Where it has been demonstrated that such features cannot be retained, removal or damage shall only be acceptable in circumstances where the anticipated ecological impacts have been mitigated as far as possible and appropriate compensatory measures can be secured to ensure no net loss of the local biodiversity resource.

Nesting Birds

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 from March to August inclusive. All British birds, their nests and eggs are protected under Section 1 of the Wildlife and Countryside Act 1981 (as amended) and the Countryside and Rights of Way Act 2000 while birds are nesting, building nests and sitting on eggs. 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. This season is usually taken to be the period between 1st March and 31st August but some species are known to breed outside these limits.

Reptiles

A precautionary method of working must be undertaken including a sensitive (phased) vegetation clearance methodology between the months of April and October, carried out under the supervision of a suitably qualified ecologist. Reasonable avoidance measures have been proposed and are welcomed, this will be secured by 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 (09 January 2026) confirming the baseline and predicted post-development biodiversity units of the site has been submitted (including the condition assessment sheets and maps).~~

The following issues must be addressed in the baseline prior to determination:

- ~~• The redline boundary within the Biodiversity Net Gain Assessment (12 March 2025, BSG Ecology, Project No. P25-359) and Figure 1: Baseline Habitats (09 January 2026, BSG Ecology, Job Ref. P25-359, Version. 1.2) used for the BNG assessment is different from the redline boundary shown on other~~

documents such as the Site Location Plan (09 January 2026. Yiangou Architects. Drawing No. 2956-0010. Rev. P7). The redline application boundary and site boundary used for the BNG assessment must match within all provided documentation.—

- The Biodiversity Net Gain Baseline Assessment identifies the grassland as *g3c Other Neutral Grassland*, however the evidence provided does not demonstrate compliance with the UKHab definition. This habitat type must meet at least three of four criteria. Further survey evidence is required to justify the classification of *other neutral grassland (g3c)*. The information presented suggests that the habitat is more characteristic of *modified grassland (g4)*.
- The classification of the area as “vegetated garden” may be acceptable where the land is demonstrably managed as amenity grounds associated with the built use. However, in this case it appears that the use of the *vegetated garden* classification has been applied extensively across the site. While some areas may reasonably fall within this category, the submitted baseline shows that this habitat type comprises the majority of the application site, which raises concerns regarding its appropriateness. Sufficient evidence and justification must be provided to support the classification across all mapped areas.

~~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.~~

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). Following communication with the case officer and agent, it has been confirmed that the current application relates solely to a change of use and that no operational development, engineering works, excavation, construction activities, habitat removal, or other physical alterations are proposed as part of this application. 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.

CONDITIONS:

1. Compliance with submitted documents

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

- Shadow Habitat Regulations Assessment. June 2026. Ethos Environmental Planning. Project No. ETH26-357;
- RE: Hazelbury Manor HRA. 30 July 2025. Ethos Environmental Planning;
- Ecological Impact Assessment. 12 March 2026. BSG Ecology. Project No. P25-359;
- Preliminary Ecological Appraisal. 15 August 2025. BSG Ecology. Project No. P25-359;

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

2. Construction Environmental Management Plan (CEMP)

Prior to the commencement of works, including demolition, ground works/excavation, site clearance, vegetation clearance and boundary treatment works, a Construction Environmental Management Plan (CEMP) shall be submitted to the local planning authority for approval in writing. The Plan shall provide details

of the avoidance, mitigation and protective measures to be implemented before and during the construction phase, including but not necessarily limited to, the following:

- a. Identification of ecological protection areas/buffer zones and tree root protection areas and details of physical means of protection, e.g. exclusion fencing.
- b. Working method statements for protected/priority species, such as nesting birds, bats, badgers and reptiles.
- c. Mitigation strategies already agreed with the local planning authority prior to determination, such as for nesting birds, Priority Habitat Traditional Orchard, Box Mine SSSI, Woodland, hedgerows and bats; this should comprise the pre-construction/construction related elements of strategies only.
- d. Work schedules for activities with specific timing requirements in order to avoid/reduce potential harm to ecological receptors; including details of when a licensed ecologist and/or ecological clerk of works (ECoW) shall be present on site.
- e. Key personnel, responsibilities and contact details (including Site Manager and ecologist/ECoW).

Development shall be carried out in strict accordance with the approved CEMP.

REASON: To ensure adequate protection and mitigation for ecological receptors prior to and during construction, and that works are undertaken in line with current best practice and industry standards and are supervised by a suitably licensed and competent professional ecological consultant where applicable.

3. Landscape and Ecological Management Plan (LEMP)

Prior to the start of construction, a Landscape and Ecology Management Plan (LEMP) shall be submitted to and approved in writing by the Local Planning Authority. The LEMP will include long term objectives and targets, management responsibilities and maintenance schedules for each ecological feature within the development, together with a mechanism for monitoring success of the management prescriptions, incorporating review and necessary adaptive management to attain targets.

The LEMP 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 landscape and ecological features retained and created by the development, for the benefit of visual amenity and biodiversity for the lifetime of the scheme.

4. 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.

INFORMATIVES:

Bat Roosts

The roof space of Hazelbury Manor, Bradford Road, Hawthorn, Corsham, SN13 8HX 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 the roof space to living accommodation or replacing the roof could also breach this legislation and advice should be obtained from a professional bat ecologist before proceeding with work of this nature.

Artificial Lighting

The habitat within the proposed development site and the surrounding area is suitable for roosting, foraging and commuting bats. 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 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.

Final sign off – all matters addressed:

Ecologist	Date
Jessica Cracknell	11/08/2026