

Council Planning Consultation Response

ECOLOGY

Officer name:	Elizabeth Burrows
Date:	12/08/2026
Application No:	PL/2026/02837
Proposal:	Proposed 2 New Dwellings (1 x Self Build) with Landscaping
Site Address:	3 Little Common, North Bradley, Trowbridge, BA14 0TX
Case Officer:	Steven Sims

Recommendations:

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

Appropriate Assessment with a positive conclusion has been sent to Natural England, who must agree the conclusion (within 21 days) prior to this application being permitted.

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:

- Ecology and BNG Assessment (BNGA). (ABR Ecology Ltd., 30th April 2026).
- Proposed Block Plan. Drawing No AH2026/29 Sheet 1 of 3. (A Herlow and Son, 5th June 2026).

COMMENTS:

Habitats Regulation Assessment (HRA)

Salisbury Plain Special Protected Area (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 strategic AA for Salisbury Plain SPA continues to be supported by NE until end of December 2026.

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

The application site is located within the 'grey hatched' recreational zone and yellow medium risk 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). 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.

In order to conclude the AA favorably, 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. This is to be secured via section 106 agreement (s106), a section 111 (s111) agreement or unilateral undertaking (UU) (legal fees will apply). Where the applicant elects to use the S111 process the fee must be paid and S111 signed by both the applicant and the council on the granting of planning permission.

The cost of mitigation via the Council's strategic Trowbridge and Westbury Bat Mitigation Strategy (Grey hatched recreation pressure zone) would be £ 1850 (£925 per dwelling) plus legal and admin fees of 5%. The mitigation is required prior to the commencement of development and must be secured by planning obligations.

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 TBMS. 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.

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

Each residential unit contributes £1,000 per dwelling (index linked from 2018) to be paid before commencement towards habitat mitigation as detailed the TWBMS.

The total financial contribution to mitigate via the Council's strategic Trowbridge and Westbury Bat Mitigation Strategy (habitat loss) would be £2000 plus legal and admin fees of 5%.

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).

Plot 1

Based on the information available the biodiversity gain planning condition is not considered to apply to Plot 1 as shown on the Baseline Habitats Plan embedded in the Ecology and BNG Assessment (BNGA) (ABR Ecology Ltd.) this application as the application 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).

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.

Plot 2

Under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) Plot 2 of 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 (The Statutory Metric, 30 April 2026) confirming the baseline and predicted post- development biodiversity units of the site has been submitted (including the maps embedded in the Ecology and BNG Assessment (BNGA). (ABR Ecology Ltd., 30th April 2026).

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	0.10 Habitat units
	0.24 Hedgerow units
	0.01 Watercourse units
Are there any irreplaceable habitats on-site?	No
Has any habitat degradation of occurred?	No

CONDITIONS:

The following, or similarly worded, conditions are recommend:

COMPLIANCE WITH SUBMITTED DOCUMENTS

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

- Section 5 and Appendix G of Ecology and BNG Assessment (BNGA). (ABR Ecology Ltd., 30th April 2026). (name of ecology report giving recommendations for mitigation or enhancement).

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.

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

Ecologist	Date
Elizabeth Burrows	12/08/2026