

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jessica Cracknell
Date:	11/08/2026
Application Number:	PL/2026/01343
Proposal:	Construction of replacement outbuilding to create additional guest accommodation and restaurant dining area, window repairs and new surfacing to forecourt.
Site Address:	The Burford Brown, 22 Church Street, Lacock, Chippenham, SN15 2LB
Case Officer:	Peter Crozier

Recommendations:

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

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:

- Bat Survey. 15 September 2025. Envirotech. Report Ref. 8483. Version. 2;
- As Proposed Re-development of Outbuilding Site Plan. 12 February 2026. HPA Chartered Architects. Drawing No. 2397-050. Rev. B;
- As Proposed Re-development of Outbuilding Floor Plans & Roof Plan. 16 July 2026. HPA Chartered Architects. Drawing No. 2397-051. Rev. E;
- As Proposed Re-development of Outbuilding Elevations. 16 July 2026. HPA Chartered Architects. Drawing No. 2397-052. Rev. D;
- As Existing Site Plan. 13 February 2026. HPA Chartered Architects. Drawing No. 2397-002. Rev. D;
- As Existing Floor Plans & Roof Plan. 16 April 2025. HPA Chartered Architects. Drawing No. 2397-010. Rev. C;
- As Existing Elevations. 25 February 2026. HPA Chartered Architects. Drawing No. 2397-011. Rev. E;
- As Existing Outbuilding Plans, Sections and Elevations. 08 September 2025. HPA Chartered Architects. Drawing No. 2397-012. Rev. A;
- Design and Access Statement. 24 February 2026. HPA Chartered Architects. Rev. A;
- Planning Statement. February 2026. Steven Abbott. Ref. 202512.

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 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.

In 2023, the building was assessed as having negligible potential to host roosting bats. In 2025, the building was re-surveyed and was found to have been soft stripped and scaffolded. It was concluded to have negligible potential to support roosting bats. The Bat Survey recommends that any works are undertaken in accordance with precautionary measures, which is welcomed. Any future amendments to the proposals that would affect features with potential bat roosting value may require further survey work, and a review of mitigation and management measures will be required and will be subject to reassessment under the Habitats Regulations. Subject to retention of key boundary features and implementation of a sensitive lighting strategy, it is likely that the functionality of the habitats within the site and their availability to bats will not be adversely affected.

A test of likely significance has been carried out by the relevant Competent Authority (Wiltshire Council) as required by Regulation 63 Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. This concluded that given the scale and nature of the development there is no mechanism for adverse effect. The Habitat Regulation Assessment (HRA) has concluded that the application will not result in any mechanism for adverse effect on Annex II bats, or on the conservation objectives of the SAC and subsequently is screened out of Appropriate Assessment.

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. Suitable lighting to ensure dark foraging and commuting routes can be retained could be secured via condition.

Nesting Birds

There are multiple records of swifts associated with the area. 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. The inclusion of ecological enhancements as part of the proposed development should focus on delivering ecological functionality for swifts, see comments below.

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 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.

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 swifts, bats and hedgehogs.

It is currently expected that all new developments will provide the ratio of 1:1 feature to building in line with *BS 42021:2022 Integral nest boxes – Selection and installation for new developments*.

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). All details on exact locations and specifications must be added to all working plans to avoid oversight and to ensure consistency and enforceability. Bird/bat boxes will continue to be available for birds/bats for the lifetime of the development. See condition below.

CONDITIONS:

1. Compliance with submitted documents

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

- Bat Survey. 15 September 2025. Envirotech. Report Ref. 8483. Version. 2.

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

2. Ecological Enhancements

Prior to the commencement of any works, including vegetation removal and demolition, details of the number, design and locations of ecological enhancement features including bat boxes, bird or swift boxes, and hedgehog hibernacula shall be submitted to the Local Authority for approval. The approved details shall be implemented for the lifetime of the development and before completion of the final works.

REASON: To provide mitigation /enhancement for biodiversity.

3. 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.

Final sign off – all matters addressed:

Ecologist	Date
Jessica Cracknell	13/08/2026