

Council Planning Consultation Response

ECOLOGY

Officer name:	Patrick Olshansky
Date:	20/08/2026
Application No:	PL/2026/03436
Proposal:	Intensification of use of existing residential caravan site to allow standing of an additional two residential caravans
Site Address:	Land At 2 The Holdings, Ashton Common, Steeple Ashton, BA14 6DT
Case Officer:	Steven Sims

Recommendations:

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

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date submitted)
	Confirmation of sites position relative to residential curtilage.	CHSR	Statement.	No
	Survey and mitigation requirements of the TWBMS not satisfied.	CHSR	Ecology survey report, impact assessment and mitigation proposals.	No

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:

- Block Plan (uploaded 1 Jun 2026)
- Location Plan (uploaded 1 Jun 2026)
- Proposed elevations / Floor Plans (uploaded 1 Jun 2026)

COMMENTS:

Habitats Regulation Assessment (HRA)

The proposed development lies within the following consultation zones for bats associated with the Bath & Bradford on Avon Bats SAC:

- Bechstein's 1.5 km Core Roost Buffer
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The site is also located within the red high-risk zone of the Trowbridge and Westbury Bat Mitigation Strategy (TWBMS, adopted July 2025).

A comparable application (PL/2023/10772) for additional residential caravans and associated works was approved by ecology on 19/11/2025. The current proposal is materially similar. An Appropriate Assessment under Section 63 of the Habitats Regulations was completed for that application, concluding no adverse effect on site integrity subject to secured mitigation. Natural England raised no objection (email dated 25/11/2025).

Under the TWBMS, new development within the red zone is highly unlikely to be permitted, and no net increase in residential curtilage or light levels is acceptable. The previous assessment treated the proposal as occurring within an existing curtilage, with lighting and habitat compensation/enhancement secured by condition, alongside a Section 111 contribution for strategic recreational mitigation.

- **Upon review it is unclear if the site qualifies as an existing curtilage. Confirmation of this point is required to complete assessment for reasons stated above.**

Review of the previous application shows that the earlier approval appears to have been granted on the basis of insufficient supporting evidence when assessed against the requirements of the TWBMS. Each application must be assessed on a case-by-case basis, and all relevant policy and guidance, including the TWBMS, must be fully applied going forward.

The TWBMS sets out survey requirements for proposals, including surveys by a licensed ecologist and baseline lighting assessments. These are essential to undertake a proportionate Appropriate Assessment. The TWBMS also sets out on-site mitigation requirements. No such information has been submitted for the current application.

- **The above information is therefore requested. The applicant is advised to consult the TWBMS to ensure all criteria and survey and mitigation requirements are met ([Biodiversity and development - Wiltshire Council](#)).**

The application has potential to result in significant adverse impact on the Bath & Bradford on Avon Bats 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.

Insufficient information has so far been submitted to enable the AA to be undertaken, which must be completed and the conclusion agreed with Natural England prior to the application being determined.

Compliance with CP50 (no net loss etc)

The submitted Block Plan (uploaded 1 Jun 2026) includes new hedge planting but provides not detail such as composition. Further details on hedge planting can be secured by condition but must be provided upfront if required to support AA.

The proposal may introduce or increase illuminance of boundary habitat. A suitable lighting strategy can be secured by condition but must be provided upfront if required to support AA.

Protected Species

See Habitats Regulation Assessment (HRA) above.

Biodiversity Net Gain (BNG)

This application was submitted after Biodiversity Net Gain (BNG) became mandatory however information required for applications subject to the biodiversity gain condition has not been submitted.

Applications subject to the biodiversity gain condition must be accompanied by minimum information set out in [Article 7 of The Town and Country Planning \(Development Management Procedure\) \(England\) Order 2015](#), which includes:

- [the completed metric calculation tool](#) showing the calculations of the pre-development biodiversity value of the onsite habitat on the date of application (or proposed earlier date) including the publication date of the biodiversity metric used to calculate that value;
- a description of any [irreplaceable habitat](#) (as set out in [column 1 of the Schedule to the Biodiversity Gain Requirements \(Irreplaceable Habitat\) Regulations 2024](#)) on the land to which the application relates, that exists on the date of application, (or an earlier date); and
- plan(s), drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application (or earlier proposed date), including any irreplaceable habitat (if applicable).

Note: this is a summary, please refer to Paragraph: 011 [Biodiversity net gain - GOV.UK](#) for full details.

If the applicant considers that the development would not be subject to the biodiversity gain condition, Schedule 7A of the Town and Country Planning Act 1990 the applicant must provide a statement as part of the planning application setting out the reasons why they believe this is the case. Submission of a completed metric calculation tool may be necessary to evidence the statement.

Photographs from the site visit (carried out on 19/02/2024) shows that boundary hedgerows and trees have been cut back. If this took place without authorisation following 30 January 2020 the pre-development baseline for BNG must be set to its value immediately before any habitat degradation occurred.

IN SUMMARY:

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

DRAFT CONDITIONS (TBD):

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

Ecologist	Date