

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name: Mary Holmes

Date: 21/05/2026; **27/08/2026**

Application No: PL/2026/02164

Proposal: The Construction of a Small Steel-framed Building to Create an Indoor Gym for Members

Site Address: Trowbridge Rugby Football Club, Paxcroft, Hilperton, Trowbridge, BA14 6JB

Case Officer: Steven Vellance

Recommendations:

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

Table 1 : Further Information Required

	Issue	Policy / Legislative compliance	Date information requested & Summary of further information required	Satisfactorily addressed (Document & Date)
1.	Bath and Bradford-on-Avon Bat SAC	Habitat Regulations /TWBMS	21/05/2026: A plan showing the exact locations and specifications of luminaires. See below for further detail.	NO
2.	Biodiversity Net Gain	Environment Act 2021.	21/05/2026. The redline boundary used for the BNG assessment is different from the redline boundary submitted for planning. The size of the site submitted for planning is 0.33ha but the size of the site shown on the baseline habitat mapping/recorded in the small sites metric is 0.8ha. These two areas must match in size and location/area. 27/08/2026	27/08/2026 To be dealt with post-determination

			Comments below.	
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The outstanding document(s) listed above are needed to enable the council's ecology team to consider all the 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: Any changes to the documents previously submitted must be highlighted, otherwise they will not be considered.

Matters Considered

Thank you for consulting me on the above application in relation to ecology. I have reviewed the submitted information against various mapping (OS and aerial) of the surrounding areas together with a review of any relevant designated sites and existing records of protected/notable species.

Reports submitted in support of this application:

Design & Access Statement (TRFC, March 2026).

Lighting & Ecology Statement (TRFC, no date).

Small Sites Metric completed by Andrew Lunt on 31/03/2026.

The application site lies on the north-eastern side of Trowbridge beyond the settlement boundary within the grounds of the existing Rugby Football Club. The application site is located within the 'yellow risk' medium zone of the Trowbridge & Westbury Bat Mitigation Strategy (TWBMS) SPD (adopted July 2025). The 'yellow risk' medium zone represents the areas where habitat has been shown to be of importance associated with the Bath and Bradford-on-Avon Bat SAC. In addition, the application site is located in one of the core buffer zones for Bechstein's bats and the Council know all three qualifying SAC bats commute/forage in the vicinity of this site.

A small area of modified grassland will be lost, which has low suitability for commuting or foraging bats. However, adjacent boundary vegetation is known to be used by SAC bat species.

This application is one of many submitted in the last few years (most recent apps include: PL/2024/10898; PL/2024/02230; PL/2024/09978; PL/2024/02246).

Lighting

While the aforementioned submitted documents set out high-level lighting principles (directional, low-spill, warm LED lighting with PIR controls and no floodlighting), no detailed lighting layout or specifications have been provided.

Given the sensitivity of boundary habitats, any external lighting must comply with the Trowbridge and Westbury Bat Mitigation Strategy (2025) requirement for "completely dark" conditions (≤ 0.2 lux horizontal and ≤ 0.4 lux vertical).

While the applicant has confirmed there will be no flood lighting or mobile lighting, they must submit a plan showing the exact locations and specifications of luminaires.

This must be submitted prior to determination.

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 small sites metric calculation completed by Andrew Lunt on 31/03/2026. confirming the baseline and predicted post- development biodiversity units of the site has been submitted.

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

- The redline boundary used for the BNG assessment is different from the redline boundary submitted for planning. The size of the site submitted for planning is 0.33ha but the size of the site shown on the baseline habitat mapping/recorded in the small sites metric is 0.8ha. These two areas must match.

Biodiversity Net Gain Additional comments 27/08/2026

The red line site boundary should correspond with the BNG baseline habitat mapping boundary. However, in the interests of progressing the application, this issue can be addressed at the Biodiversity Gain Plan stage, which is a post determination matter.

The Biodiversity Gain Plan will need to be accompanied by a detailed habitat plan covering the entirety of the red line application boundary. This must include all hardstanding, structures and building footprints, for example, which should be mapped as "Urban - Developed Land; Sealed Surface", together with all other habitat/grassland areas and any other habitats present within the site boundary.

The submitted BNG habitat mapping and metric must accurately reflect the full extent of the development site.

Please note: Although submission of the Biodiversity Gain Plan is a post-determination matter, the Gain Plan document already submitted will not be acceptable and it needs to be changed in accordance with the above comments.

Please note:

It appears the applicant is proposing to deliver BNG off-site within the blue line boundary. However, any land outside the red line application boundary (including within the blue ownership boundary) is defined as off-site and will need to be secured via a Section 106 agreement (refer to information here: [Make off-site biodiversity gains as a developer - GOV.UK](#))

While confirmation of how the scheme achieves the required 10% BNG is a post-determination matter, consideration must be given at this stage to how any off-site provision will be secured and delivered. In addition, all off-site biodiversity gains must be registered on the national biodiversity gain site register. *Guidance on how to register a biodiversity gains site including a list of items required to apply can be found here - [Register a biodiversity gain site - GOV.UK](#)*. In order for the Biodiversity Gain Plan condition to be discharged all off-site gains must be shown on the Biodiversity Gain Plan as allocated to this development on the national biodiversity gains site register.

Off-site gains must be secured via a legal agreement for at least 30 years. This must be a planning obligation (Section 106 agreement) or conservation covenant. Wiltshire Council will not enter into a Section 106 agreement for off-site gains unless the off-site gain site has been verified.

Contact ecologychargeableservice@wiltshire.gov.uk to request further information on site verification.

Therefore, the applicant may wish to reconsider the red line boundary and review the use of the small sites metric. If the revised small sites metric demonstrates that 0.25 biodiversity units or less are required, and on-site delivery is not achievable, statutory biodiversity credits may be used/purchased without the need to demonstrate off-site options.

Final sign off – all matters addressed: NO

Ecologist	Date