

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jenna Buss
Date:	02/09/2026
Application number:	PL/2025/09565
Proposal:	Conversion of the Existing Listed Building for 2No Two Bed Apartments and 4No 1 Bed apartments in a new 4 storey building at the rear
Site address:	3 Fore Street, Trowbridge, BA14 8HY
Case officer:	Verity Giles-Franklin

Recommendations:

	No Comment
	Support
	No objection
	Condition (no objection subject to conditions)
x	Objection - further information required
	Objection in principle
	HRA completed/required

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date)
1	Protected Species	Habitat Regulations, CP50, NPPF	Bat emergence survey data and where appropriate an impact assessment and mitigation strategy	

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.

I have reviewed the application and supporting documents against OS Maps and aerial photography of the site and surrounding area, together with GIS layers of statutory and non-statutory sites and existing records of protected species.

The following submitted documentation was reviewed to inform this response:

- Preliminary Ecological Appraisal. October 2025. Origin Environmental
- Proposed Site Plan 3903.201 Rev E. February 2026. BHPH

Protected and Notable Species

The existing building proposed for conversion is a mid-terrace, two storey building situated in the centre of Trowbridge within an urban environment. No evidence of protected or notable species were recorded on site. However, the mid terrace section of the building was assessed as holding

moderate potential to support bats likely crevice roosting, specifically the first floor level internal masonry and roof void space. Further surveys to include emergence surveys are recommended within the ecology report but no additional information has been submitted to support the application.

The information provided therefore contains insufficient information to determine potential impacts on protected species: bats.

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.

Nesting by feral pigeons on the first floor of the main building has occurred as access via the rear door was possible, with detritus from the pigeons making it difficult to determine if bat activity has occurred on site. Measures will need to be put in place to ensure nesting bird checks are undertaken prior to works commencing, this could be secured by condition.

A single tree exists on site, this should be protected during construction. Urban trees should be retained wherever possible due to their significant ecological value, providing habitat, foraging opportunities and connectivity for a wide range of wildlife, while contributing to biodiversity, climate resilience and the overall health of the urban environment.

Trowbridge & Westbury Bat Mitigation Strategy (TWBMS)

The application site is located within the grey zone of the Trowbridge & Westbury Bat Mitigation Strategy (TWBMS) and a Greater Horseshoe core roost buffer associated with the Bath & Bradford on Avon Bats Special Area of Conservation (SAC) and therefore has potential to result in significant adverse impact on the special features of the 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.

The grey medium risk zone represents an area where new residential development is likely to result in increased recreational use of important woodland bat sites. In order to conclude the AA favourably, new residential development proposals for 49 dwellings or less within the grey hatched medium risk zone will be expected to provide a financial contribution of £925 per dwelling towards the Council's strategic recreational pressure mitigation scheme.

For this application the cost of mitigation via the Council's strategic Trowbridge and Westbury Bat Mitigation Strategy would be £5,550 (£925 per dwelling for 6 units) plus legal fees.

Developer contributions must be secured through a Section 111, Section 106 or Unilateral Undertaking at the time of permission with contributions secured prior to commencement. The applicant should be directed to the Guidance Note for Completing Agreements Under S.111 of the Local Government Act 1972. 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 site is subject to human disturbance, light spill and will result in minimal loss of habitat (within an urban centre) which is not likely to be of significant value to Annex II bats. As such, the AA concludes no adverse effects on the SAC site, subject to the contribution listed above. This AA must be sent to Natural England once the additional survey information has been submitted and the application must not be determined until they have agreed with the LPA's conclusion.

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: 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).

CONDITIONS:

To be finalised once additional information has been submitted.

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

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

2. 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 and bird boxes shall be submitted to the Local Authority for approval. The approved details shall be implemented for the lifetime of development and before completion of the final works.

REASON: To provide mitigation /enhancement for biodiversity.

No development shall commence on site (including any vegetation removal or works to existing structures), until a Construction Method Statement has been submitted to, and approved in writing by the Local Planning Authority. The Construction Method Statement shall include all precautionary measures to be implemented during the construction period, for the protection of sensitive habitats and species known to be present within or adjacent the site, with particular reference to: Birds

The development shall be carried out in strict accordance with the approved Construction Method Statement.

REASON: To ensure adequate protection, mitigation and compensation for protected species and priority habitats throughout the construction period.

INFORMATIVES:

Nesting Birds

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

Final sign off – all matters addressed:

Ecologist Jenna Buss	Date
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