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Your ref: PL/2026/01383



Julie Mitchell
Case Officer
Wiltshire Council

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BY EMAIL ONLY

Dear Ms Mitchell,

Planning consultation: The development of 90 dwellings with new access from Blind Lane, internal roads and footpaths, areas of open space (including play space), drainage, landscaping and associated plant and works.

Location: Land off Blind Lane, Southwick, Wiltshire

Thank you for your consultation on the above dated 03 June 2026.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Internationally and nationally designated sites

Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC) – Objection Further Information Required

The application site lies within an area known to support bats that form part of the populations for which the Bath and Bradford-on-Avon Bats SAC is notified and therefore has the potential to affect its interest features. European sites are afforded protection under the Conservation of Habitats and Species Regulations 2017, as amended (the 'Habitats Regulations').

In considering the European site interest, Natural England advises that you, as a competent authority under the provisions of the Habitats Regulations, should have regard for any potential impacts that a plan or project may have¹. The [Conservation objectives](#) for each European site explain how the site should be restored and/or maintained and may be helpful in assessing potential impacts.

On the basis of information provided, Natural England's advice is that this proposed development will require mitigation measures intended to avoid or reduce the likely harmful effects on a European site which cannot be taken into account when determining whether or not a plan or project is likely to have a significant effect on a site and requires an appropriate assessment (following the People Over Wind ruling by the Court of Justice of the European Union). For this reason, the proposed mitigation measures need to be formally checked and confirmed by your Authority, as the

¹ Requirements are set out within Regulations 63 and 64 of the Habitats Regulations, where a series of steps and tests are followed for plans or projects that could potentially affect a European site. The steps and tests set out within Regulations 63 and 64 are commonly referred to as the 'Habitats Regulations Assessment' process.

The Government has produced core guidance for competent authorities and developers to assist with the Habitats Regulations Assessment process. This can be found on the Defra website. <http://www.defra.gov.uk/habitats-review/implementation/process-guidance/guidance/sites/>

competent authority, via an Appropriate Assessment.

Habitats Regulations Assessment – Appropriate Assessment

Natural England notes that the Habitats Regulations Assessment (HRA) has not been produced by your authority, but by the applicant. As competent authority, it is your responsibility to produce the HRA and be accountable for its conclusions. Natural England is a statutory consultee at the Appropriate Assessment stage of the Habitats Regulations Assessment process. The following advice is provided to support the conclusions drawn and to assist your authority to undertake an Appropriate Assessment:

Bat Activity

The submitted ecological survey results demonstrate that the site is used by at least 9 bat species, including Annex II species (Greater horseshoe bat, Lesser horseshoe bat and Barbastelle). Bechstein's bat is assumed to be present on site. The site is also used by bat species considered threatened in the UK (ie Serotine). Although occurring in low numbers the number of species present is significant therefore it is important to ensure the scheme maintains and enhances commuting and foraging opportunities for bats.

Bat Mitigation

Natural England welcomes that the scheme is to retain the majority of hedgerows and trees with bat roost features. We also note that these retained habitats are to be enhanced and that a Habitat Mitigation and Monitoring Plan is to be produced. The long term management of retained habitats should focus on benefitting the local bat population, notably Annex II species for which the Bath and Bradford on Avon Bats SAC is notified.

As noted above, the bat survey results demonstrate that Annex II species linked to the Bath and Bradford on Avon Bats SAC are present on site and the site is located within the yellow medium risk zone of the TWBMS. It is therefore advised that the scheme adheres to the TWBMS guidance in relation to core bat habitat buffers and light spill. In order to adhere to the TWBMS, core bat habitat should be buffered by 15m of new core bat habitat and a further 15m dark buffer zone. The aim of this is to ensure that the core bat habitat is adequately buffered from the urban fringe to maintain and enhance the functionality of the existing ecological corridors. Your Authority should be satisfied that the proposed buffers meet the TWBMS guidance. It is noted that the watercourse along the south eastern boundary is proposed to be buffered by 15m of new core bat habitat (zone A) and 10m of dark buffer (zone B). Any deviation from the TWBMS guidance should clearly demonstrate how it is to the benefit of the local bat population.

The site is considered important for providing commuting and foraging resource for a variety of bat species, including Annex II species. Given the location and on site habitats it is unsurprising to understand that survey results show bats using boundary features for commuting and foraging with more bat activity observed along the southeastern watercourse and hedgerow. These ecological features are considered core bat habitat and should be appropriately buffered from any development, as previously mentioned. The scheme should also ensure that commuting routes between foraging areas and known commuting corridors are retained and enhanced.

To increase the sites capacity to provide foraging opportunities for bats, the proposals may include various enhancement measures such as the planting of fruit trees or wildflower planting. The SuDS should also be designed to hold permanent water. Habitat enhancement should be agreed with your local authority's ecology team.

Lighting Strategy

Natural England welcomes the considerations of the impacts of lighting. The lighting strategy for the development must meet the lux levels prescribed in the TWBMS guidance. The lighting strategy for the scheme should consider the construction and operational phases and be agreed by your Authority. We further advise that a post-development lighting survey is secured by planning condition and that any remedial measures will be implemented in areas of excess light levels.

Due to the sensitivity of this location, we would welcome a condition to ensure that no construction

lighting is installed.

Suitable Alternative Natural Greenspace (SANG)

The proposed scheme falls within the buffer zone to provide mitigation in line with the adopted Trowbridge and Westbury Bat Mitigation Strategy (TWBMS) and is of a scale which would be required to provide SANG and a financial contribution to strategic habitat mitigation. For residential development, the financial contribution is £972.03 per dwelling and should be secured via a legal agreement prior to determination. The Wiltshire Local Plan Review was withdrawn in Spring 2026 and the site allocations are currently unknown, with a Call for Sites currently underway. Therefore, it is advised that the scheme provides bespoke mitigation.

We understand that the proposed development is seeking to provide a financial contribution of £925 per dwelling to mitigate for recreational impacts on woodlands which support bats associated with the Bath and Bradford on Avon Bat SAC. The proposed financial contribution is for new residential development of less than 50 dwellings to contribute to strategic recreational pressure mitigation, as detailed in the TWBMS. The proposed development is of a scale which requires the delivery of SANG, therefore Natural England request clarity on the proposed SANG to be delivered to mitigate for recreational pressure on the Trowbridge Woods in line with the TWBMS. This information should include a SANG strategy which provides details of SANG area, adherence to the SANG criteria and a management plan. Please note that the SANG should ideally be a continuous area of greenspace and that a circular walk, which can include paths around the development outside of the SANG area, should be provided. Should there be any shortfall in functional on site SANG, your authority should agree an amended package for SANG provision. Natural England would be happy to contribute to these discussions.

Construction Environmental Management Plan (CEMP)

A CEMP for the scheme to avoid and mitigate effects on ecological features should be agreed by your Authority prior to commencement of the scheme.

The CEMP should detail how the existing watercourse, hedgerows and trees will be protected, and how dust will be controlled during construction.

Landscape and Ecological Management Plan (LEMP)

The scheme should provide for the retention and enhancement of habitats the details of which will be set out in a LEMP. Natural England supports the need for the LEMP which should be agreed by your Authority prior to commencement of the scheme.

Other Matters:

Protected Species

Natural England has produced [Protected species and development: advice for local planning authorities \(gov.uk\)](#) (standing advice) to help planning authorities understand the impact of particular developments on protected species.

Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances. A protected species licence may be required in certain cases. We refer you to [Wildlife licences: when you need to apply - GOV.UK \(www.gov.uk\)](#) for more information.

Local sites and priority habitats and species

The local planning authority should consider the impacts of the proposed development on any local wildlife or geodiversity site, in line with paragraphs 187, 188 and 192 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity to help nature's recovery. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local environmental records centre, wildlife trust, geoconservation groups or recording societies. Emerging [Local nature recovery strategies - GOV.UK \(www.gov.uk\)](#) may also provide further useful information.

Those habitats and species which are of particular importance for nature conservation are included as 'priority habitats and species' in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest on the Magic website or as Local Wildlife Sites. We refer you to [Habitats and species of principal importance in England - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/habitats-and-species-of-principal-importance-in-england) for a list of priority habitats and species in England. You should consider priority habitats and species when applying your 'biodiversity duty' to your policy or decision making

Natural England does not routinely hold priority species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Further general advice on consideration of protected species and other natural environment issues is provided at Annex A.

Should the developer wish to discuss the detail of measures to mitigate the effects described above with Natural England, we recommend that they seek advice through our [Discretionary Advice Service](#).

Natural England is a statutory consultee on the Appropriate Assessment stage of the Habitats Regulations Assessment process, and a competent authority should have regard for Natural England's advice. Please re-consult Natural England once the Appropriate Assessment has been completed.

Should the proposal change, please consult us again.

If you have any queries relating to the above advice please contact me on kyle.conroy@naturalengland.org.uk.

Yours faithfully,

Kyle Conroy
Sustainable Development Senior Officer
Wessex Area Team

Natural England offers the following additional advice:

Wider landscapes

Paragraph 187 of the NPPF highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry-stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape and Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Guidelines for Landscape and Visual Impact Assessment \(GLVIA3\) - Landscape Institute](#) for further guidance.

Biodiversity duty

Section 40 of the [Natural Environment and Rural Communities Act 2006 \(legislation.gov.uk\)](#) places a duty on the local planning authority to conserve and enhance biodiversity as part of its decision making. We refer you to the [Complying with the biodiversity duty - GOV.UK \(www.gov.uk\)](#) for further information.

Biodiversity and wider environmental gains

Development should provide net gains for biodiversity in line with the NPPF paragraphs 187(d), 192 and 193. Major development (defined in the [National Planning Policy Framework \(publishing.service.gov.uk\)](#) glossary) is required by law to deliver a biodiversity gain of at least 10% from 12 February 2024 and this requirement was extended to smaller scale development in Spring 2024. For nationally significant infrastructure projects (NSIPs), it is anticipated that the requirement for biodiversity net gain will be implemented from 2026.

For further information on the timetable for mandatory biodiversity net gain, we refer you to [Biodiversity Net Gain moves step closer with timetable set out - GOV.UK \(www.gov.uk\)](#). [Biodiversity net gain - GOV.UK \(www.gov.uk\)](#) provides more information on biodiversity net gain and includes a link to the draft [Biodiversity net gain - GOV.UK \(www.gov.uk\)](#) Planning Practice Guidance.

The statutory biodiversity metric should be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. We refer you to [Calculate biodiversity value with the statutory biodiversity metric - GOV.UK \(www.gov.uk\)](#) for more information. For small development sites, [The Small Sites Metric - JP040 \(naturalengland.org.uk\)](#) may be used. This is a simplified version of the statutory biodiversity metric and is designed for use where certain criteria are met.

The mitigation hierarchy as set out in paragraph 193 of the NPPF should be followed to firstly consider what existing habitats within the site can be retained or enhanced. Where on-site measures are not possible, provision off-site will need to be considered.

Where off-site delivery of biodiversity gain is proposed on a special site designated for nature (e.g. a SSSI or habitats site) prior consent or assent may be required from Natural England. More information is available on [Sites of Special Scientific Interest: managing your land](#).

Development also provides opportunities to secure wider biodiversity enhancements and environmental gains, as outlined in the NPPF (paragraphs 8, 77, 109, 125, 187, 188 and 193). Opportunities for enhancement might include incorporating features to support specific species within the design of new buildings such as swift or bat boxes or designing lighting to encourage wildlife.

[The Environmental Benefits from Nature Tool - Beta Test Version - JP038 \(naturalengland.org.uk\)](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory biodiversity metric.

[Natural environment - GOV.UK \(www.gov.uk\)](https://www.gov.uk) provides further information on biodiversity net gain, the mitigation hierarchy and wider environmental net gain.

Designated nature conservation sites

Paragraphs 193-195 of the NPPF set out the principles for determining applications impacting on Sites of Special Scientific Interest (SSSI) and habitats sites (Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Both the direct and indirect impacts of the development should be considered.

A Habitats Regulations Assessment is needed where a proposal might affect a habitat site (see [Habitats regulations assessments: protecting a European site - GOV.UK \(www.gov.uk\)](https://www.gov.uk) and Natural England must be consulted on 'appropriate assessments' (see [Appropriate assessment - GOV.UK \(www.gov.uk\)](https://www.gov.uk) for more information for planning authorities).

Natural England must also be consulted where development is in or likely to affect a SSSI and provides advice on potential impacts on SSSIs either via the [SSSI Impact Risk Zones \(England\) \(arcgis.com\)](https://arcgis.com) or as standard or bespoke consultation responses. Section 28G of the Wildlife and Countryside Act 1981 places a duty on all public bodies to take reasonable steps, consistent with the proper exercise of their functions, to further the conservation and enhancement of the features for which an SSSI has been notified ([Sites of special scientific interest: public body responsibilities - GOV.UK \(www.gov.uk\)](https://www.gov.uk)).

Ancient woodland, ancient and veteran trees

The local planning authority should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 193 of the NPPF. The [Natural England Access to Evidence - Ancient woodlands Map](https://www.gov.uk) can help to identify ancient woodland. Natural England and the Forestry Commission have produced [Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK \(www.gov.uk\)](https://www.gov.uk) (standing advice) for planning authorities. It should be considered when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances.