

Council Planning Consultation Response

ECOLOGY

Officer name:	Elizabeth Burrows, Senior Ecologist
Date:	11/09/2026
Application No:	PL/2026/01663
Proposal:	Internal and external alterations including extensions
Site Address:	Little Court, 47-49, Upper South Wraxall, Bradford On Avon, BA15 2SE
Case Officer:	Angela Ellis

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.

Information considered:

- Bat and Bird Survey and Assessment (Alder Ecology UK Ltd, 23rd September 2024).
- Certificate of Completion. BR/2025/21803.

COMMENTS:

Habitats Regulation Assessment (HRA)

Bath and Bradford on Avon Bat Special Area of Conservation (SAC)

A test of likely significance has been carried out by the relevant Competent Authority (Wiltshire Council) as required by Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended). This concluded that given the scale and nature of the development combined with the surveys strongly indicating bat species for which the SAC is designated will not be impacted, there is no mechanism for adverse effect. The HRA has concluded that the application is not likely to have significant impacts on the Bath and Bradford on Avon Bat SAC and subsequently the application is screened out of Appropriate Assessment

Bats

The submitted report confirms that prior to the re-roofing permitted under application PL/2024/10942 the roof supported bat roosts at three locations on the southern roof elevation. Bat droppings were also recorded within the roof void, indicating potential use of the internal roof space, although this was not confirmed during surveys.

Presumably the re-roofing was carried out in accordance with the recommendations in the report and under a European Protected Species license (EPS) meaning it may still support bat roosts. Information confirming if the current proposals will impact retrained or replacement roosts has not been provided. However, given the low conservation status of bat previously identified and small area of roof impacted by the extensions the risk of harm to roosting bats is low and can be safely managed by the applicant obtaining advice from professional bat ecologist before proceeding with work.

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 application is for development which is subject of a householder application within the meaning of article 2(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015.

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.

Informative:

Bats

The roof is used as a bat roost. Under the Conservation of Habitats and Species Regulations 2017 (as amended), it is an offence to harm or disturb bats or damage or destroy their roosts. Planning permission for development does not provide a defence against prosecution under this legislation. The applicant is advised that a European Protected Species Licence will be required before any work is undertaken to implement this planning permission. Future conversion of the roof space to living accommodation or replacing the roof could also breach this legislation and advice should be obtained from a professional bat ecologist before proceeding with work of this nature.

Nesting Birds

The chimney and roof be used by 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.

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

Ecologist	Date
Elizabeth Burrows	11/09/2026