

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Kirsten Pryde (Graduate Ecologist)
Date:	25/09/2026
Application number:	PL/2026/04708
Proposal:	Alterations to existing outbuildings to create a home gymnasium suite
Site address:	South Wraxall Manor, Upper South Wraxall, Bradford On Avon, BA15 2SD
Case officer:	Andrew Thomas

Recommendations:

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

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date)
	Bats	Conservation of Habitats and Species Regulations 2017	25/09/2026 Confirmation of bat roost locations.	NO - Stage II Bat Survey 6th of July 2026 by Greena Ecological Consultancy

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 consulting Ecology, 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:

- Design and Access Statement August 2026 Project No 1084
- Block & Roof Plan as Proposed ref: 1084.P.001 A
- GCN Report 08.07.2026 by Greena Ecological Consultancy ref: 3023-2026
- Stage II Bat Survey 6th of July 2026 by Greena Ecological Consultancy
- Tree Survey Project No 1084 August 2026 by benjamin + beauchamp architects
- Ground Floor Plan as Proposed drawing no: 1084.P.002

Matters Considered:

Habitats Regulations Assessment (HRA)

Bath and Bradford-on-Avon Bats Special Area for Conservation (SAC)

The application site is located within a consultation zone for bats 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 that site.

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 absence of SAC qualify species, there is no mechanism by which the proposal could give rise to an adverse effect. The HRA has concluded that the application is not likely to have significant impacts on the SAC and subsequently the application is screened out of Appropriate Assessment.

Protected Species and habitat

The submitted Stage II Bat Activity Survey report confirms that bats are currently using buildings within the site. The report concludes that four common pipistrelle bats were recorded emerging from the south elevation of the stable block and states that no bats were observed emerging from the workshop.

However, Table 13 is titled "Video recordings workshop" and records bats emerging from beneath roof tiles and from a wall crevice, including emergence from beneath tiles adjacent to the dormer. This appears inconsistent with the subsequent results and conclusions, which attribute these emergence records to the stable block. Clarification of the status of roosts in the stable block including precise locations from which the bats were recorded emerging is therefore required.

It is also noted that not all elevations of the workshop appear to have been subject to direct observation by a surveyor or camera during the emergence surveys. In particular, the north and west sides of the workshop do not appear to have been directly observed, with bat activity instead recorded by a static detector. Consequently, it is currently unclear whether bats can be confidently excluded from roosting within potential roosting features on these parts of the building. This is of particular relevance as the proposals include stripping and replacement of the workshop roof covering, which have the potential to affect roosting features should these be present.

The report must be amended by the project ecologist to:

- Clarify the discrepancy within Table 13 and confirm the bat roost status of the workshop.
- Confirm the location of all recorded bat emergence points.
- Confirm whether the survey effort undertaken is sufficient to establish the presence or likely absence of roosting bats within all parts of the workshop affected by the proposed works.
- Clarify whether any confirmed or identified bat roost or roost access point would be impacted by the proposed development.
- Where impacts to a bat roost are anticipated, required mitigation and compensation measures must be specified on a plan..

Once amended to address the issues raised the report must be submitted to the LPA for review.

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.

DRAFT CONDITIONS:

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

- Stage II Bat Survey 6th of July 2026 by Greena Ecological Consultancy Section Conclusions
- Bat Mitigation Plan [if required, reference to be confirmed]

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

Final sign off – all matters addressed:

Ecologist	Date
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