

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	30/09/2026
Application number:	PL/2026/03902
Proposal:	Proposed landscaping and ecological works associated with an existing holiday accommodation complex, including tree and hedgerow planting, orchard reinstatement, ponds, sustainable drainage features, additional parking and formation of Padel courts and enclosure together with the erection of storage and service building to support the operation and management of the estate
Site address:	Hesdin Estate, Thoulstone, Chapmanslade, Westbury, BA13 4GF
Case officer:	Julie Mitchell

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)
a)	BNG	Town and Country Planning Order 2015, Environment Act 2021	30/09/2026 -Completed metric spreadsheet -Clarification of watercourse locations, types and units -Condition assessment sheets -Confirmation that all proposed BNG is within the redline boundary	

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, aerial photography 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:

- Planning Statement, Squires Planning, June 2026
- Existing Site Plan, Blockworks, April 2026
- Proposed Site Plan, Blockworks, April 2026
- Elevations, Blockworks, April 2026

- Preliminary Ecological Appraisal & BNG Feasibility Assessment, Beamsley Ecology, June 2026
- Statutory Biodiversity Metric, Daniel Ross, June 2026

The site comprises a holiday accommodation complex where it is proposed to install padel courts, additional car parking, and a storage and servicing building, as well as extensive landscaping. The site has numerous previous planning applications, some of which involving ecological mitigation (e.g., wildlife-sensitive lighting, ecological construction method statements, enhancements; see 19/10721/FUL; PL/2022/05697). It does not appear that the current proposals would impact the ecology mitigation approved under said applications.

COMMENTS:

Salisbury Plain Special Protection Area (SPA) 6.4km buffer

This application lies within the 6.4km zone of influence of the Salisbury Plain SPA and potential impact of recreational pressure on stone curlew, in combination with other plans and projects, must be considered.

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 (there will be no new overnight accommodation created), there is no mechanism for adverse effect, and any temporary construction impacts and operational impacts would be de-minimus. The HRA has concluded that the application is not likely to have significant impacts on Salisbury Plain SPA and subsequently the application is screened out of Appropriate Assessment.

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

The site is located at the edge of a Lesser Horseshoe core roost buffer (consultation zone) associated with the Bath and Bradford-on-Avon SAC. The current proposal therefore has potential to result in significant adverse impact on the special features of the Bath and Bradford-on-Avon 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 currently proposed development which (i) involves no overall loss of a roost of a qualifying species, (ii) does not propose removal of any core bat habitat, and (iii) does not propose any additional external lighting, there is no mechanism for adverse impact on the Conservation Objectives of the SAC, and the proposal can be screened out of Appropriate Assessment.

Protected species

The proposal involves the loss of modified grassland, ruderal vegetation, tall forbs and developed land. However, given the size of the site and extent of habitats present, the risk posed to protected species is considered relatively low. No trees are proposed for removal, and no non-native invasive plant species were observed during the site survey. A Construction Method Statement should be implemented (and secured via condition) to ensure that precautionary measures are applied, such as the timing of vegetation removal to avoid the bird nesting season, sensitive lighting during construction, and any necessary pre-commencement checks.

Previous survey work associated with 19/10721/FUL noted the presence of barn owl pellets in two buildings. Additionally, during bat emergence surveys (2019), serotine, long-eared, pipistrelle, *Myotis* and horseshoe bats were recorded. In line with NPPF and with CP50, gains

for biodiversity, relevant to local habitats and wildlife populations, should form part of the proposed development. As such, ecological enhancements should be secured via a condition – these should include features such as bat and barn owl boxes, and hibernacula (as recommended in the ecology report).

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 statutory metric calculation and maps (Preliminary Ecological Appraisal & BNG Feasibility Assessment, Beamsley Ecology, June 2026; Statutory Biodiversity Metric, Daniel Ross, June 2026) estimating the baseline and predicted post-development biodiversity units of the site have been submitted. The estimated pre-development (baseline) situation is summarised below.

On-site pre-development (baseline) biodiversity value	24.05 Habitat units
	0.31 Hedgerow units
	0.35 Watercourse units
Are there any irreplaceable habitats on-site?	No
Has any habitat degradation of occurred?	No

As the development and site boundary crosses into the riparian zone of a watercourse, a watercourse value has been calculated. The following issues need to be addressed:

- It is not clear which watercourse/s the metric has considered. The ecology report maps a ditch to the south, but does not map the watercourse at the east (which is shown in OS basemap layers). Clarification is required.
- A number of tabs appear to be missing from the submitted BNG metric, including the baseline hedgerow and watercourse tabs
- All condition assessment sheets (including watercourse assessments and MoRPh datasheets, if appropriate) should be provided
- The ecology report states that the watercourse has not been mapped fully and therefore the full length of the watercourse (where it is adjacent to/overlaps with the redline boundary) is not considered within the baseline. However, as per BNG guidance, the full length of the watercourse must be included in the baseline, including culverted sections. Further clarification, or a revised metric, must be provided.
- Please can a statement be provided confirming that all watercourse enhancements will be conducted within the redline boundary (*works outside of the redline boundary would need to be secured via a legal agreement*)?

As above, several points need to be addressed before the baseline can be accepted. In any case, the proposed habitat creation and habitat enhancements shown in the ecology report are welcomed (NB. these are not detailed within the submitted BNG metric) and will provide significant biodiversity gains.

IN SUMMARY: Whilst there is not an ecology objection to the principle of development at this site, some BNG information remains outstanding. The information outlined above

should be submitted and reviewed by the LPA's ecology team prior to determination of the application.

CONDITIONS: wording to be provided once above issues addressed.

Informative – artificial lighting

The habitat within the proposed development site and the surrounding area is suitable for roosting, foraging and commuting bats. An increase in artificial lux levels can deter bats which could result in roost abandonment and/or the severance of key foraging areas. This will likely result in a significant negative impact upon the health of bat populations across the region. Artificial light at night can have a substantial adverse effect on biodiversity. Any new lighting should be for the purposes for safe access and security and be in accordance with the appropriate Environmental Zone standards set out by the Institute of Lighting Engineers in their publication GN01:2021, 'Guidance for the Reduction of Obtrusive Light' (ILP, 2021), and Guidance note GN08-18 "Bats and artificial lighting in the UK", issued by the Bat Conservation Trust and Institution of Lighting Professionals.

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

Ecologist	Date
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