

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	13/03/2026, 06/10/2026
Application number:	PL/2026/00595
Proposal:	Conversion of curtilage-listed redundant agricultural buildings to form four residential dwellings, including the demolition of modern farm buildings, the formation of a new vehicular access, and associated landscaping, drainage and ancillary works.
Site address:	Old Manor Farm, High Street, Wedhampton, Devizes, SN10 3QE
Case officer:	Lucy Rutter-Dowd

Recommendations:

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

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date)
a)	Phosphorus neutrality	Habs. Regs. 2017	13/03/2026 -Updated nutrient calculator	06/10/2026 <i>Mitigation approach remains unconfirmed – see main text</i>
b)	Bat mitigation	CP50, NPPF, Habs. Regs. 2017	13/03/2026 -Hibernation survey results -Details and dimensions of the bat void roosts, plus specifications of crevice roost features	06/10/2026 <i>Mitigation must be clearly shown on individual plans</i>
c)	BNG	Environment Act 2021, Town and Country Planning Order 2015, CP50	13/03/2026 -Clarification of redline boundary, updated metric as required -Condition assessment sheets	06/10/2026 <i>Satisfactorily addressed</i>

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:

- Ecological Assessment, Pro Vision, December 2025
- Biodiversity Net Gain Assessment, Pro Vision, December 2025
- Statutory Biodiversity Metric, Louisa Standbrook-Jones, December 2025
- Nutrient Statement, Holbury, January 2026
- Natural England Nutrient Neutrality budget calculator for the River Avon SAC
- Proposed Site Plan, AD Draughting Architectural Services, December 2025
- Barns 1 & 2, Proposed Elevations and Plans, AD Draughting Architectural Services, November 2025
- Barns 6 & 8, Proposed Elevations and Plans, AD Draughting Architectural Services, November 2025
- Barns 4 & 5, Proposed Elevations and Plans, AD Draughting Architectural Services, November 2025
- [Natural England Nutrient Neutrality budget calculator for the River Avon SAC, uploaded July 2026](#)
- [Nutrient Statement, Holbury, January 2026, updated July 2026](#)
- [Technical Note, Pro Vision, July 2026](#)
- [Barns 4 & 5, Proposed Elevations and Plans, AD Draughting Architectural Services, July 2026](#)
- [Statutory Biodiversity Metric, Lousia Standbrook-Jones, July 2026](#)
- [Biodiversity Net Gain Assessment, Pro Vision, July 2026](#)

The site comprises redundant farm buildings, proposed for redevelopment into four dwellings. It is neighboured by a mix of residential and farm buildings, interspersed with areas of grassland and woodland.

[Thank you for re-consulting Ecology; my second comments are shown in blue.](#)

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 in light of the HRA for the Wiltshire Core Strategy and the HRA for the Wiltshire Housing Site Allocations Plan it is screened into Appropriate Assessment due to the potential impact of recreational pressure on stone curlew in combination with other plans and projects.

A strategic Appropriate Assessment (AA) has been prepared pertaining to development within the 6.4km zone of influence that could result in a likely significant effect on the SPA as a result of an increase in recreational / visitor pressure. The AA reached a conclusion of no adverse effects on the integrity of the SPA or its qualifying features provided that the council's mitigation strategy continues to be implemented. Annual stone curlew monitoring and protection measures continue to be secured by the Council.

In January 2026 Natural England (NE) confirmed that the 2026 strategic AA for Salisbury Plain SPA continues to be supported by NE.

River Avon Special Area of Conservation (SAC) Hampshire Catchment

This development falls within the catchment of the River Avon SAC and has potential to cause adverse effects alone or in combination with other developments through discharge of phosphorus in wastewater. Appropriate Assessment (AA) 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 submitted nutrient budget calculated a total phosphorus budget of 4.04 kg TP/year pre 2030 and 1.81 kg TP/year post 2030. However, the following issue must be addressed:

- The current land use type is entered as “residential urban land”, and the future land use type is also entered as “residential urban land”. This does not reasonably represent the change in land use type that will result from the proposed development. The site has been used for agricultural purposes in the past. The previous and current nutrient load (from, e.g., agricultural processes and run-off) will differ from that associated with residential uses (e.g., fertiliser). The current land use type must therefore be amended in the nutrient budget calculator.

Please note that the development lies within a sub-catchment (Upper Avon Western Arm) where the Council’s mitigation is unlikely to be available to fully mitigate the nutrient burden of this scheme.

Once the above concerns have been addressed within the calculator and the final budget agreed, the applicant can choose to secure Council Mitigation with the permission or progress the application without securing mitigation at permission stage. However, nutrient neutrality must be secured before any development can lawfully commence and must be secured via a planning obligation (Grampian condition or legal agreement).

If the applicant elects to pursue this latter route, it should be noted that the planning permission will neither secure bespoke mitigation nor reserve any Council phosphorus credits. Consequently, there remains a risk that adequate mitigation may not be available, which could prevent the development from lawfully commencing.

Where a third party or bespoke scheme is proposed, a bespoke AA must be prepared and sent to NE, the application must not be determined until NE have endorsed the AA.

An updated nutrient statement and calculator have been provided. The issue regarding the nutrient calculator has been addressed, and the current land use updated to "mixed". The amended nutrient budget now calculates a total phosphorus budget of 4.59 kg TP/year pre 2030 and 2.35 kg TP/year post 2030. The budget has been approved by Wiltshire Council.

Whilst the budget has been agreed, details of a mitigation strategy have not been provided. The nutrient statement indicates that the preferred approach would be to apply a Grampian condition to planning permission, which would require nutrient neutrality to be approved and secured prior to any works commencing. However, as noted previously, the development lies within a sub-catchment where the Council’s credit availability is very low (i.e., there are currently less credits available than the credits that would be required for this scheme), and the likelihood of increased availability in the future is limited. Moreover, the Council are not aware of any third-party schemes operating in this catchment that could provide the mitigation required to offset this proposal.

If the applicant elects to pursue the Grampian route, it should be noted that the planning permission will neither secure bespoke mitigation nor reserve any Council phosphorus credits. Consequently, there remains a risk that adequate mitigation may not be available, which could prevent the development from lawfully commencing.

Due to the nature and location of this proposal we would advise that other options are considered prior to any permissions being granted to reduce this risk. Options could include:

- putting forward a bespoke mitigation package;
- securing the available Council credits and proceeding with a smaller development initially– with a smaller nutrient burden – that can be mitigated, and/or
- delaying development and revising options post 2030

Given the nature, scale and location of the proposal, together with the significant nutrient burden arising from the development, it is considered that sufficient information has not been provided at this stage to demonstrate that the proposal would not adversely affect the integrity of the relevant European sites. Further details of the proposed nutrient mitigation strategy are therefore required. In the absence of this information, it is not currently possible for the competent authority to undertake an Appropriate Assessment that would reach a favourable conclusion.

Once the applicant has confirmed an acceptable mitigation approach, a bespoke AA must be prepared and sent to NE; the application must not be determined until NE have endorsed the AA.

Protected and notable species

Bats – roosts

During the preliminary roost assessment, droppings were recorded in three of the eight buildings on site. These were confirmed through DNA analysis to be that of brown long-eared, Natterer's and lesser horseshoe bats. Subsequently, three emergence surveys were conducted of these buildings, as well as a fourth building which had been assessed as having high bat roosting potential. The results were as follows:

- Barn 1: Two day roosts for common pipistrelle bats; one day roost for brown long-eared bats
- Barn 2: One day roost for common pipistrelle bats
- Barn 5: Day roost for common pipistrelle, serotine and brown long-eared bats, with brown long-eared bats also foraging inside the barn
- Barn 6: Day roost for brown long-eared bats; roost for lesser horseshoe bats (as per evidence of droppings)

Static detector surveys were also conducted between 9th September-16th September 2025. Lesser horseshoe presence was confirmed in Barn 6, though activity levels were low, and did not coincide with dusk or dawn. It was therefore concluded that Barn 6 likely supports a night roost of lesser horseshoes.

The ecology report states that the buildings hold “high hibernation potential”, and “To inform a licence application it is recommended that hibernation surveys are undertaken”. No hibernation survey results have been provided. Please can the applicant provide an update on this?

The submitted technical note clarifies that hibernation surveys have not been undertaken, but will be carried out to inform the licence application. The applicant should be made aware that the currently proposed mitigation would not be suitable for hibernating bats. Nonetheless, the site photos indicate that hibernation suitability is likely to be limited; in the event that the additional surveys do show that hibernating bats are making use of the site, then the plans will need to be altered, and Ecology consulted on any amended mitigation.

Under the Conservation of Species and Habitat Regulations 2017, 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 mitigation licence will be required before any work is undertaken to implement this planning permission.

The ecology report recommends that two replacement void roosts are incorporated into the development, one in Barn 4, and one in a car port. However, the plan for Barn 4 does not show a bat loft, and includes glazing from floor to roof height on multiple elevations, which will likely introduce a notable level of light spill and may not be suitable here depending on the roost entrance location. Similarly, the plan showing the car port (attached to Barns 1 and 2) does not include details of a replacement roost. Appropriate details of the proposed bat roost replacements must be included on enforceable plans. For the void roosts, this should include internal dimensions and design (e.g., absence of trusses through the roof space, membrane details, baffle or hopper entrance, hot box), as well as the dimensions of the access point(s). For the crevice roost replacements, whilst it is appreciated that locations are shown on the proposed site plan, the designs/specifications of these features must be clarified. Finally, results of the hibernation surveys are needed to demonstrate that the proposed roost replacements will be sufficient compensation for the types of roosts that will be impacted.

The elevation plan for Barns 2 (containing the car port) and 4 now mark out voids and bat access tiles. The technical note states that the Barn 4 void will include an internal bat box, the void will be untrussed and lined with bitumen style felt, and the void will measure 12m x 7m x 2.7m. Whilst these details are welcomed, as stated above, appropriate details of the bat roost replacements must be shown on enforceable plans. The following must be submitted:

- Plans showing cross sections of the bat loft structures, with dimensions, roof lining details, bat access features, and internal layout
- Clarification of the location of the replacement roost(s) in Barn 2. The proposed site plan shows a void roost above the car port (denoted in the text as having a half ceiling), but the elevation plan indicates 'void' above the dwelling section of the barn, and not the car port
- Specifications of the access tiles and crevice roosting features (including type of and design of bat boxes)

Bats – lighting

As stated in the bat survey report, lighting design should avoid illuminating flight paths to and from the new roosts as well as foraging/commuting habitat. 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 GN08-23 "Bats and artificial lighting at night", issued by the Bat Conservation Trust and Institution of Lighting Professionals. An appropriate lighting strategy should be secured via a condition.

Great Crested Newts (GCN)

There are three ponds within 250m, though the site offers habitat of limited suitability for use by GCN during their terrestrial phase (hardstanding, short sward grassland, and ornamental hedgerow). Using Natural England's Rapid Risk Assessment tool, and assuming that GCN may use the site, the risk of offence is considered "highly unlikely". Appropriate working measures, to ensure this risk remains minimal, should be set out within a Construction Method Statement (CMS) to be secured via condition.

Other

The small length of non-native ornamental hedgerow at the east of the site is considered unlikely to be of any value to hazel dormice as it lacks connectivity to other suitable habitats. Similarly, the site offers limited habitats suitable for use by reptiles or badgers. Nonetheless, given the records of badgers, hedgehogs and slow worms locally, precautionary measures for these taxa should be detailed within the CMS.

The adults, young, eggs and nests of all species of birds are protected by the Wildlife and Countryside Act 1981 (as amended) while they are breeding. Please be advised that works should not take place that will harm nesting birds (such as vegetation clearance or building demolition) from March to August inclusive. 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.

In line with the NPPF and with CP50, applications must ensure that gains for biodiversity, relevant to local habitats and wildlife populations, should form part of the proposed development. As such, ecological enhancements – such as provisions for birds, invertebrates and hedgehogs – should be secured via a condition. The site should also remain permeable to wildlife; whilst post-and-rail fencing is denoted at the site boundaries, it is not clear whether the fencing between plots will be permeable.

Biodiversity Net Gain

A completed statutory metric calculation and map (Biodiversity Net Gain Assessment, Pro Vision, December 2025; Statutory Biodiversity Metric, Louisa Standbrook-Jones, December 2025) confirming the baseline and predicted post-development biodiversity units of the site have been submitted.

The pre-development (baseline) situation is summarised below.

On-site pre-development (baseline) biodiversity value	1.40 Habitat units
	0.02 Hedgerow units
	0.00 Watercourse units
Are there any irreplaceable habitats on-site?	No
Has any habitat degradation of occurred?	No

The redline boundary used for the BNG assessment is different from the redline boundary shown on the location plan. The redline application boundary and site boundary used for the BNG assessment must match. Please can the applicant clarify which redline boundary is correct, and amend the BNG metric, map and condition assessments as appropriate?

[The BNG information has been updated to match the redline boundary shown on the plans.](#)

Further, the BNG report states that full condition assessments are provided alongside said report. However, these do not appear to have been submitted with the application. The condition assessment sheets for the baseline habitats must be provided prior to determination.

Thank you for providing the condition assessment sheets, which support the habitat conditions entered into the metric. The pre-development (baseline) is now accepted as accurate based on the information provided, and the baseline values are summarised below.

On-site pre-development (baseline) biodiversity value	1.42 Habitat units
	0.02 Hedgerow units
	0.00 Watercourse units
Are there any <u>irreplaceable</u> habitats on-site?	No
Has any habitat <u>degradation</u> of occurred?	No

Confirmation of how the development will achieve BNG is a post-determination matter, however, consideration should be given to how any proposed BNG will be secured.

The submitted metric indicates 0.25 biodiversity units or less will be required to meet the 10% BNG requirement and that on-site BNG is not achievable. In these circumstances statutory credits can be bought without providing evidence that insufficient off-site options are available in England. For further information please refer to guidance on Statutory Biodiversity Credits on the GOV.UK website (<https://www.gov.uk/guidance/statutory-biodiversity-credits>) under 'How to prove statutory credits are needed'.

IN SUMMARY: Insufficient information has been submitted. In carrying out its statutory function, the LPA must be reasonably sure that the proposal will not result in significant adverse effects on protected sites or species. The information outlined above must be submitted and reviewed by the LPA's ecology team prior to determination of the application. I therefore maintain a holding objection until all the issues listed above have been suitably addressed.

CONDITIONS: wording to be provided once above issues addressed.

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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