

## Wiltshire Council Planning Consultation Response

### ECOLOGY

**Officer name:** Fiona Elphick

**Date:** 5/7/2018

Application No: 18/04656/FUL  
Proposal: Conversion of former school principal building to 5 No. dwellings, and associated external works; the erection of 16 No. dwellings; conversion and alteration of the Wool Store Building to form a communal garage/store and vehicular access; and comprehensive landscaping  
Site Address: Courtfield House, Polebarn Road, Trowbridge, BA14 7EG  
Case Officer: Matthew Perks

### Recommendations:

<input type="checkbox"/>	No Comment
<input type="checkbox"/>	Support
<input type="checkbox"/>	Support subject to conditions (please set out below)
<input checked="" type="checkbox"/>	Object (for reasons set out below)
<input type="checkbox"/>	No objections

### Matters Considered:

The application is supported by a Phase I Habitat Survey Report by Starke Ecology, dated March 2018. However, this appears to suggest that the proposal is only for the conversion of the former school building, until the "Discussion" section where the additional housing provision is mentioned. As a result, there is no detailed survey of the area of land to the north of the former school building and no assessment of how the ecology of this part of the site may be affected by the proposal.

I viewed the site from outside the boundary wall on 28<sup>th</sup> June, which was sufficient to indicate that the ecological survey report has not assessed the site in terms of the whole development. In addition, there is insufficient information on how bats may use the site. Although the site is not within any of the Bath & Bradford on Avon Bats SAC consultation zones, it does fall between two such zones and as such lies in an area that is very likely to be used by foraging and commuting bats. Wiltshire Council is currently developing a Trowbridge Bat Mitigation Strategy which will require stringent survey and mitigation for Annex II bats within the Trowbridge area, in relation to all residential development.

### Buildings

The buildings within the site were conducted very late in the survey season, with only one emergence and one dawn return survey being carried out. This revealed a small number of pipistrelles associated with the roof, which is of stone tiles in moderately good condition.

The report states that the building has a cellar but does not say if this was searched for the presence of bats. It also states that there was a lot of debris on the floor of the interior of all parts of the building and that bat droppings may not have been visible.

A visual inspection of the building from outside of the site boundary suggests that there are numerous places where bats could roost, including concealed voids which may be suitable for a maternity roost, therefore the potential for this building to support bats should be classified as "high". The report states

that not all parts of the building were inspected due to safety issues. Given the late survey date and the lack of inspection of all parts of the building, the resulting report is insufficient to support the application as it cannot identify the number and species of bat that may be present, the type and status of the roost and how they are using the building.

The survey report suggests that further survey is required in order to inform an application to Natural England for the necessary licence to conduct the works without contravening the wildlife legislation, however this work needs to be completed and reported **prior to** the LPA determining the application. As stated, the use of the building by bats has not been sufficiently determined, therefore it is not possible to judge whether sufficient mitigation would be possible, such that a licence from Natural England would likely be forthcoming.

### **Other Habitats**

The ecology report describes apple and pear trees within the northern part of the site and refers to these as an orchard. Orchards have a unique mix of biodiversity, not found in other treed/woodland areas and are becoming increasingly scarce. Orchards that support a suitable level of biodiversity qualify as UK BAP Priority Habitat and are therefore protected through planning under NPPF and locally under Wiltshire Core Policy 50. Further survey will be required to assess the quality of the orchard in terms of biodiversity and to determine whether this orchard qualifies as UK BAP Priority Habitat.

The ecology report says that the trees were assessed for their suitability to support bats and that none had developed any features likely to support roosting bats. However, it does not state which trees were surveyed and clearly not all of them were, since I could see split limbs, lifted bark, cavities and other opportunities for roosting, quite clearly from outside the site. I request some clarity as to which trees have been assessed.

The site is very close to the River Biss corridor which runs through the centre of Trowbridge, connecting areas of priority habitat and providing a commuting route for bats and other wildlife. All four Annex II bat species have been recorded within or very close to the edge of Trowbridge and it is highly likely that they use the Biss corridor to commute to and from various roost sites at different times of the year. Sufficient survey including transect and static bat activity surveys will be required to identify any key flight lines for Annex II bat species either within or immediately adjacent to the site.

A reptile survey was carried out very late, at a suboptimal time of year and is unlikely to have provided accurate results. Slow worms are known to be present in many of the town's gardens in this area. They are relatively sedentary creatures and will not easily move away from disturbance, therefore a strategy for preventing harm to slow worms during construction is required and for accommodating them within the site post construction.

The badger survey carried out discovered a single badger latrine and some foraging signs (snuffle holes) but simply stated that badger setts could be obscured by the vegetation around the edges of the site. This highlights the fact that the northern part of the site has not been assessed for impacts as a result of the proposed development.

Planning applications must be supported by sufficient information to allow the LPA to judge whether protected habitats or species would be adversely affected by the proposed development, in line with NPPF. We will therefore require a suite of bat surveys more appropriate to the scale and nature of the development and to the existing records of Annex II bat species in close proximity to the site. We will also require a full assessment of the orchard to determine whether it qualifies as Priority Habitat and further information on reptiles, badgers and nesting birds, together with a full assessment of how the **whole site** would be affected by the proposed development and a suitably robust mitigation and enhancement strategy.

I maintain a holding objection until the above information has been supplied, however I will only be able to lift that objection if appropriate and sufficient mitigation can be designed to demonstrate no significant impact on protected habitats or species.

I think it unlikely that mitigation for the loss of an orchard will be possible within the site, therefore I would object in principle to development of this part of the site unless a suitable solution could be found.

I would be happy to discuss the survey scope further with the consultant ecologist if required.

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