

Ecology Addendum – July 2023

Land to West of White Horse Business Park, Trowbridge

Relating to planning application 20/03641/OUT

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	Name	Signature	Position	Date
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Rev letter	Date prepared	Prepared by	Checker / Approver	Description of changes
P02	03/08/2023	AI		Update to BNG Metric Calc to include retained habitats

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1.0 Introduction

- 1.1 Castlewood Properties Limited submitted a planning application (20/03641/OUT) for a residential led development on land to the west of White Horse Business Park, Trowbridge, hereafter referred to as the “Site”. The initial submission was informed by an Ecological Impact Assessment and Green Infrastructure (GI) Parameters Plan prepared by Nicholas Pearson Associates (NPA).
- 1.1.1 The initial Wiltshire Council Ecology consultation response (04/11/20) requested further information/clarification on a range of issues. In response to this NPA undertook further consultation with Wiltshire Council Ecology and prepared an Ecology Addendum and an updated GI Parameters Plan in January 2022.
- 1.1.2 Updated consultation responses were received from Wiltshire Council Ecology and Natural England in November 2022. Since that time the NPA and the applicant have undertaken further consultation with Wiltshire Council Ecology and Natural England and have significantly revised the proposals to address their concerns.
- 1.1.3 This addendum and associated updated GI Parameters Plan describe/show the revised proposals, provides an updated Biodiversity Net Gain Assessment and provides responses to the November 2022 consultation response.

2.0 Revised Proposals

- 2.1.1 The revised proposals are shown on the Illustrative Sketch Layout (Turley CASR3002 4005 Rev K) and GI Parameters Plan (NPA 11020 301 P03).
- 2.1.2 Given the relatively high levels of activity recorded of bat species associated with the Trowbridge Bat Woodlands and that the allocation site provides suitable habitat for bats to commute between two urban areas that provide connectivity between the woodlands and components of the Bath and Bradford-on Avon Special Area of Conservation (SAC) to the north, it was agreed the allocation is important to provide connectivity through the landscape.
- 2.1.3 Given the above, it was agreed that to provide a higher degree of confidence that the sites would continue to provide this function post development, that a significantly larger buffer/corridor would be required than is set out with the Trowbridge Bat Mitigation Strategy (TBMS). As such it was agreed to provide a field's width corridor in the western half of the Site and allow proposed built development to be concentrated in the eastern half with buffer at the margins smaller than that set out within the TBMS. The same approach was agreed for the proposed development to the south (planning app ref

PL/2022/05426) such that if that if both applications are approved, they would provide a robust integrated/continuous network of bat habitat through the landscape that would avoid negatively impacting bat species associated with the TBMS.

2.1.4 As shown on the GI Parameters Plan the revised proposals would include:

- A buffer of over 100m between the built development proposals and built development within North Bradley,
- The buffer would be enhanced for bat commuting/foraging, including through provision of a woodland corridor (to provide strong north-south bat connectivity), parkland trees, scrub planting and sensitive grassland management.
- A retained dark corridor east-west from Elm Grove through to Axe and Cleaver Lane.
- A minimum 10m buffer along the eastern boundary of the Site with the woodland belt of the White Horse Business Park, and
- Sensitive lighting proposals to ensure a robust dark integrated network of bat habitat, achieved through sensitive street lighting proposals (as shown in the update Lighting Strategy – Abley Letchford Partnership, July 2023), housing along the boundary with the White Horse Business Park not having any glazing above first floor level facing that boundary and housing along all the boundaries having sensitively designed internal lighting.

3.0 Consultation Queries

3.1.1 The following sections provide responses to the specific queries raised in the November 2022 Wiltshire Council ecology response.

Roosts on/adjacent to Site

3.1.2 An update assessment of the potential of trees to support roosting bats was undertaken of all trees with the potential to be impacted by the proposals in May 2022. This identified that there only 2 trees with the potential to be impacted by the proposals. These were trees T44 and T45 (as shown on the GI Parameters Plan) which were considered to offer moderate and low potential to support roosting bats respectively. T44 was a mature Common Oak with had 3 branches with splitting bark and a tear-out wound at 5m above ground level. T45 was another mature Common Oak which had no obvious roosting features present but was assigned low potential given its size and age.

- 3.1.3 In accordance with best practice guidelines 2 No. emergence surveys were proposed for T44 and no emergence surveys were proposed for T44.
- 3.1.4 Surveys of T45 were undertaken by 2 No. experienced bat surveyors using full spectrum bat detectors (AnaBat Walkabout) and a night vision aid (Sony Handycam FDR-AX53) recorded any roosting bats present. The surveys were undertaken in suitable weather conditions (no or little rain, no strong wind above Beaufort 3, and moderate temperature (above 10°C)). The surveys commenced 15 minutes prior to sunset and continued up to 2hrs thereafter (see Table 1 below for survey details). Given a roosting bat was recorded on the initial survey a further 2 No. surveys were undertaken in 2022, with an update emergence under in July 2023.

Table 1: T45 Emergence Survey Dates and Weather Conditions

Date	Sunset/Sunrise (start/ finish)	Weather Conditions			
		Temp (°C) start/finish	Beaufort	Rain	Cloud Cover (%)
10/08/22	20:34 (20:19/22:19)	24/19	1	No rain	0
28/08/22	20:13 (19:58/21:58)	21/16	1	No rain	25
09/09/22	18:52 (18:37/20:07)	13/11	0	No rain	10
06/07/23	21:27 (21:12/22:57)	16/11	2	No rain	10

- 3.1.5 On the first survey on the 10th of August 2022 a single Noctule bat was recorded emerging. No further bats were recorded during the remaining surveys. As shown on the GI Parameters Plan the proposals continue to provide a 15m buffer from the tree to proposed built development with this buffer to remain dark.
- 3.1.6 As set out in section 3.0 the January 2022 Addendum, the automated detector records suggest there are roosts for Myotis somewhere to the south of the allocation and no significant roosts for horseshoe species within the area.
- 3.1.7 Given the lack of features associated with swarming/mating (e.g. caves) the large number of GHS records along Little Common lane in October 2018 are not considered to be associated with a roost.

Foraging/Commuting

- 3.1.8 The hedgerow on which automated detectors V2 & C5 were deployed is now shown as Core Bat Habitat on the GI Parameters Plan.
- 3.1.9 Only low numbers of species associated with the Trowbridge Woodlands were recorded on the transect surveys, with only 2 GHS, 4 LHS and 29 Myotis species passes recorded on Site across the 15 No. transects undertaken. None of the horseshoe passes were suggestive of foraging behaviour. As shown in Appendix 1 only 8 out of the 29 Myotis species passes were of foraging/possible foraging behaviour.
- 3.1.10 Based on the manual transect records, that grassland managed for silage is not optional for the woodland species associated with the TBMS and the Site's position between two urban areas that provide connectivity to wider landscape, it considered that the Site is more important for commuting/ its connectivity function in the landscape than for foraging.

Offsite Areas

- 3.1.11 Whilst the automated detectors nearer to the Elm Grove site recorded fewer passes of species associated with the TBMS, the proposals for this Site still allow for a dark corridor east-west across the Site between Elm Grove and Axe and Cleaver Lane.

Mechanism for Maintenance

- 3.1.12 There are various options for mechanism to manage the areas of GI on Site. This could include transferring some of the land/woodland to a third party *e.g.* Council / NGO.

Masterplan

- 3.1.13 Masterplan document now being submitted with the requested information.

4.0 Biodiversity Metric

- 4.1.1 The updated Metric calculation based on the GI parameters plan demonstrates the proposals could result in an 18.57% increase Habitat Units, and therefore the revised proposals would still exceed the 100% habitat mitigation criteria of the TBMS.
- 4.1.2 As previously, to maximise BNG scoring the metric has been populated based on the remaining grassland being retained and enhanced. As discussed with and accepted by the county ecologist and Natural England, if habitats that were more beneficial to the woodland bat species were then proposed

(e.g. woodland, orchard, scrub), but which scored more poorly on the metric, the score based on grassland retention/enhancement would be accepted.

Appendix 1: Myotis Records from Transect Surveys

Date	Listening Point	Near Static Detector?	Time	Notes	Sunset/Sunrise	Within an hour of SS/SR?
19-Jul-22	E10	C4	22:08	Commuting along hedge	21:15	53 minutes after sunset
13-Aug-22	W7	C1	23:05	Commuting	20:35	
13-Aug-22	E3	C1	21:53	HNS Single pass/Commuting	20:35	
30-Aug-18	E10	C4	21:17	HNS Single pass/Commuting	20:00	
30-Aug-18	E8	C4	21:41	HNS Commuting	20:00	
30-Aug-18	E6-5	C2	22:01	Foraging - several passes	20:00	
30-Aug-18	E5	C2	22:08	2 passes (22:05 & 22:08 recorded as HNS Single pass/Commuting)	20:00	
30-Aug-18	E3	C1	22:22	HNS Single pass/Commuting	20:00	
30-Aug-18	W3-2	C6	21:52	3 Passes (recorded as commuting heading east)	20:00	
30-Aug-18	W2	C6	21:54	Commuting	20:00	
12-Sep-18	E10	C4	20:12	HNS Single pass/Commuting	19:31	41 minutes after sunset
12-Sep-18	W2	C6	20:50	HNS Single pass/Commuting	19:31	
12-Sep-18	W6-7	C1	21:31	HNS Single pass/Commuting	19:31	
26-Sep-18	W10	C6	21:38	Commuting	18:59	
26-Sep-18	E8	C4	20:36	Brief faint pass	18:59	
26-Sep-18	E8	C4	20:40	Several passes/Foraging	18:59	
26-Sep-18	E10	C4	21:38	Several faint passes/Foraging?	18:59	
09-Oct-18	E10	C4	19:21	Single fast pass	18:30	51 minutes after sunset
09-Oct-18	E1	C6	20:51	Single fast pass	18:30	
09-Oct-18	W2	C6	21:08	HNS Single pass/Commuting	18:30	
24-Apr-19	W9	C3	22:19	HNS Single pass/Commuting	20:19	
09-May-19	E1	C6	21:49	Several passes/Foraging	20:51	58 minutes after sunset
09-May-19	E10	C4	23:16	HNS Single pass/Commuting	20:51	
09-May-19	E2		23:27	HNS Single pass/Commuting	20:51	
09-May-19	W5		21:34	Commuting	20:51	43 minutes after sunset
09-May-19	W2	C6	23:16	Commuting	20:51	
28-May-19	E1	C6	22:22	Several passes/Foraging	21:11	
19-Jun-19	W4		22:57	2 passes (22:57 & 22:59 recorded as HNS Single pass/Commuting)	21:28	
26-Jun-19	E8-7	C4	22:22	Constant foraging	21:29	53 minutes after sunset

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