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integrating nature conservation

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Dear Jane,

Little Thornham Farm, Trowbridge Road, Seend, Melksham, SN12 6PQ - Response to Ecology Officer Comments

The following request for further information has been made by Wiltshire City Council with regards planning application PL/2023/06399 at Little Thornham Farm:

"*The application site is located within an informal consultation zone for bats associated with the Bath & Bradford on Avon Bats Special Area of Conservation (SAC) due to the presence of a significant lesser horseshoe roost within 2 km. The development therefore has potential to result in significant adverse impact on the special features of that site. Lesser horseshoe bats have been recorded on the site and insufficient information has so far been submitted to determine the impacts of the development on this species and therefore to enable the HRA to be undertaken.*"

Information to Support a Habitat Regulation Assessment

Proposed developments can have spatial implications that extend beyond proposed site boundaries. For the purposes of HRA it is recognised that distance in itself is not a definitive guide to the likelihood or severity of an impact. This means that European sites at some distance from the proposed development may still need to be considered as part of the screening process.

The following sites have been considered as part of the wider screening process for the proposed development:

- *Bath & Bradford on Avon Bats Special Area of Conservation (SAC)*

Qualifying features, conservation objectives and known vulnerabilities for each of the designated sites identified are provided in **Table 1**.

Table 1. Designated sites, qualifying features, conservation objectives and known vulnerabilities

Site	Qualifying Features	Conservation objectives	Known vulnerabilities
Bath & Bradford on Avon Bats Special Area of Conservation	Annex II species that are a primary reason for selection of this site include: 1. 1304 Greater horseshoe bat *Rhinolophus ferrumequinum* 2. 132 Bechstein's bat *Myotis bechsteinii* Annex II species present as a qualifying feature but not a primary reason for site selection: 3. 1303 Lesser horseshoe bat *Rhinolophus hipposideros*	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring: 1. Maintain the abundance of the populations above their baseline population-size. 2. Maintain the total extent of the habitats which support the features. 3. Maintain the distribution and continuity of the features and their supporting habitats. 4. Maintain the structural integrity of the entrances. 5. Maintain appropriate light levels, humidity, temperature and ventilation. 6. Maintain the presence, structure and quality of any linear landscape features which function as flightlines. Flightlines should remain unlit, functioning as dark corridors. 7. Maintain any core areas of feeding habitat outside of the SAC boundary that are critical to the bat features during their hibernation period 8. Maintain the feature's ability, and that of its supporting habitat, to adapt or evolve to wider environmental change, either within or external to the site 9. Maintain the management measures (either within and/or outside the site boundary as appropriate) which are necessary to maintain the structure, functions and supporting processes associated with the feature and its supporting habitats. 10. Control and minimise human access to roost sites.	Natural England published a Site Improvement Plan (SIP) for the Bath and Bradford on Avon Bat SAC in 2015 (SIP011). This identifies a number of threats to the site and a series of actions to safeguard the SAC interests in the long term. The SIP lists the following key impacts that should be considered in relation to any proposed development: • Loss and damage to roost sites • Disturbance to bats • Loss and damage of foraging habitats • Loss and damage to flight lines

HRA guidance recommends that following an initial scoping of sites, the assessment should seek to screen out sites for which impacts are very unlikely and for sites where the conditions and underlying trends for the sites indicate favourable condition status and the effects arising from the proposed development are minimal. The site listed above were reviewed and considered in the context of the possible impacts from the proposed development.

Potential Impact Pathways

Stage 1 of the HRA process is the assessment of likely significant effects. The purpose of the screening exercise is to address the following question:

> *Is the project, either alone or in combination with other relevant projects and plans, likely to result in a significant adverse effect on the conservation objectives, designation features and integrity of the European Sites?*

To address the above question, this screening process must identify and consider the potential impact pathways by which the development proposals may lead to an adverse effect on the European designated site either alone, or in combination with other projects nearby.

Table 2 identifies potential impacts on the European designated site, and looks into how the impacts, if unmitigated for, could impact on the qualifying features.

Table 2 Potential impacts on European designated site

Potential impact	**Assessment of likely significant effect in the absence of mitigation**	**Likely significant effect (either alone or in combination)**
Physical changes	The proposals involve the conversion of the barn into holiday accommodation which has been surveyed following industry guidelines. The bat surveys found the barn to support a common pipistrelle day and hibernation roost, natterer's hibernation roost and a brown long-eared night, day and hibernation roost. The building on site does not support a lesser horseshoe roost and therefore the qualifying feature of the SAC will not be directly impacted by the proposed development. The proposals will only impact the building on site and will not result in the loss of surrounding habitats (residential garden and sheep grazed fields), which are known to be occasionally used by lesser horseshoe bat. No additional parking areas have been proposed and no vegetation will be removed, resulting in no fragmentation or modification in habitats in potential commuting corridors and foraging sites.	No likely significant effect
Lighting	No increase in lighting, such as street lighting or floodlights, is proposed as part of the new development. The site currently has sensitive lighting, including a movement activated security floodlight and a dimmed front light. The proposals include the conversion of the barn into a holiday let accommodation, no additional lighting has been proposed and it is therefore considered that they will result in no overall change in lighting levels on site.	No likely significant effect

Noise/ vibration	Any noise from the development works will be low-level and short-term. Due to the proximity of nearby dwellings, it is understood that the majority of the works will be undertaken sensibly with the removal of the current roof tiles done by hand, significantly reducing the noise level of the development works. During the construction works there may be a temporary increase in noise. However, given the presence of other properties and the distance between the site and the nearest lesser horseshoe roost (4km), it is not considered that the proposed development will result in a significant increase in noise levels at the repair, conversion or operational stages, and it is therefore not considered likely to have any significant effects on the SAC. Further, the scale of the development is such that no increase in noise as a result of traffic during the operational phase is anticipated.	No likely significant effect
Pollution - dust & fumes	Similarly, no likely significant effects are predicted on the SAC from atmospheric pollution. Any dust that may be generated by the construction will be very short-term and in line with standard working practices. The number of vehicles accessing the site and daily traffic flows will be similar to the current usage.	No likely significant effect
Mortality	The proposals will not result in a net increase in residential units within the site. The proposals involve the conversion of the barn into holiday accommodation and therefore it is not anticipated to result in a net increase in the effect of predation of cats, rats, foxes or any other potential predators associated with urbanisation.	No likely significant effect

No other relevant impact pathways have been identified for this proposal.

It is considered that the development will not result in any significant effects on the SAC above, and that site integrity will be maintained. On this basis, the site is not considered to require Stage 2 further assessment.

Please feel free to contact Darwin Ecology Ltd with any further queries relating to ecological features and proposed mitigation at the site.

Yours sincerely,



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