

PROFORMA APPROPRIATE ASSESSMENT FOR APPLICATIONS FALLING WITHIN THE YELLOW ZONE AND GREY ZONE OF THE TROWBRIDGE & WESTBURY BAT MITIGATION STRATEGY (TWBMS)

The TWBMS was adopted on 22nd July 2025.

PART A: INFORMATION REVIEWED	
Information about the plan or project	PL/2025/09842 Stables at Palmers Close, Trowbridge Road, Hilperton, BA14 7QQ The site comprises an open-fronted barn and stables proposed for conversion and extension into a dwelling. It is neighboured by a residential area to the northeast, with grassland fields to the south and west. The fields are enclosed by further residential areas. The works will result in the loss of a Greater Horseshoe feeding perch/night roost.
European Site	Bath and Bradford on Avon Bats Special Area of Conservation (SAC)
List of European Site interest features	This development is screened into appropriate assessment in relation to the Bath and Bradford on Avon Bats SAC as it lies within both the yellow and grey zones where the Council has identified a potential for development to lead to an increase in recreational pressure at woodlands in south Trowbridge and to reduce bat habitat in a zone beyond the woodlands. The site is also within a core roost buffer (associated with Bath and Bradford on Avon Bats SAC) for a Bechstein's bat maternity roost (~1km southeast). Background information for this appropriate assessment is contained in the Trowbridge & Westbury Bat Mitigation Strategy (TWBMS) which was adopted as of July 22nd 2025. The SAC's qualifying Features are as follows: 1. Bechstein's bat <i>Myotis bechsteinii</i> 2. Greater horseshoe bat <i>Rhinolophus ferrumequinum</i> 3. Lesser horseshoe bat <i>Rhinolophus hipposideros</i> The conservation objectives for the site are: "To 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; • The extent and distribution of the habitats of qualifying species; • The structure and function of the habitats of qualifying species; • The supporting processes on which the habitats of qualifying species rely • The populations of qualifying species; and • The distribution of qualifying species within the site." Publication Date: 27th November 2018 – version 3. This document updates and replaces an earlier version dated 30 June 2014 to reflect the consolidation of the Habitats Regulations 2017.

Information about the site	Supplementary advice was published by Natural England last updated on 20 March 2019 and sets out further details of the requirements needed to achieve the conservation objectives. Of particular relevance to the Trowbridge area is the need to “Maintain the presence, structure and quality of any linear landscape features which function as flightlines. These should remain unlit functioning as dark corridors”. In the Site Improvement Plan dated 1 April 2015, the lack of knowledge about the roosting habits of Bechstein’s and the foraging / commuting habitats of all three SAC species is judged by Natural England to be a threat to achieving the conservation objectives of the SAC. Bat ringing data has shown the same bats using Green Lane Wood (and surrounding woodlands) and the SAC. The woodlands are therefore considered to be functionally linked to the SAC and it is possible the conservation objectives for the SAC may not be met if the bats are disturbed or prevented from breeding there. Studies have shown that Bechstein’s bats are not confined to the woodlands but travel to find additional foraging and roosts outside them. Consequently, the TWBMS recognises the importance of both the woodlands and their surrounding habitats through 2 buffer zones. i) Extending 600m from the woodland edge, the red zone is an area of development restraint due to the high probability that this zone is of current and future importance for maintaining the breeding colonies. ii) Beyond this, the yellow zone, which takes into consideration the foraging areas and flightlines of horseshoe bats, is anticipated to be able to accept a degree of development pressure provided applications are designed in accordance with the principles in the TWBMS. iii) The grey hatched zone identifies the distance within which 75% of visitors to Green Lane Wood, Biss Wood, Picket and Clanger Woods are expected to come from and a package of mitigation measures is identified in the TWBMS to accommodate the anticipated growth within this zone.
Other relevant plans or projects	• Wiltshire Core Strategy adopted January 2015 • Trowbridge & Westbury Bat Mitigation Strategy (adopted 2025) • PL/2021/03253 - bat SAC mitigation provided in the form of flower-rich grassland 100m east of the application site

Assessment against TWBMS criteria

Item	TWBMS criteria	Details provided for Application
1	Surveys should be completed: • In accordance with Council pre-application advice if provided • In accordance with BCT Good Practice Guidelines and the specifications described in Section 6 (p25-28) of the TWBMS • Could mating sites have been overlooked (survey April and October for male roosts)	“Preliminary Ecological Appraisal and Bat Survey Report, Stark Ecology Ltd, December 2025” The preliminary roost assessment and subsequent emergence surveys (July-September 2025) found no evidence of use of the stables by any species. However, static monitoring in September 2025 recorded calls of Greater Horseshoe bats (as well as Brown Long-eared bats) in the

	Do grassland habitats have potential for foraging horseshoe species (see Section 6.3 of the TWBMS for survey requirements)	stables, after the building was found to now be open at the entrance (it is believed the door was blown open). It was concluded that the stables were now acting as a feeding perch or night roost. The proposed works are contained almost entirely on the existing buildings' footprints and, as per aerial imagery and the habitat map, it appears that a small area of bare ground will be lost. No green habitats within the wider site (e.g., hedgerow, grassland) will be lost and therefore targeted activity surveys are not considered necessary. During the emergence surveys, passes of Lesser Horseshoe bats were noted.
2	Masterplan to be provided which covers entire allocation (referenced in WHSAP housing policies) and identifies: - Core Bat Habitat features - There is no net loss of habitat within the site boundary as demonstrated by the use of the Statutory Biodiversity Metric (or any subsequent revision thereof) – see Table 7.1.	This is a minor application and a masterplan is not required.
3	<u>For outline applications</u>, Ecological Parameters Plan (para 161) to address: - Specific site design measures/restrictions to deliver the Masterplan. - Areas to remain undeveloped. - Areas to form landscaping.	Not applicable.
4	Biodiversity Net Gain Calculations demonstrate no net loss of habitat has been provided for all habitat lost where the yellow zone and the application boundary overlap.	A metric has not been submitted with this application; Biodiversity Net Gain does not apply as this application is for a self-build dwelling. Nonetheless, it appears that the only habitat to be affected is the existing building and a small area of bare ground. New hedgerow, trees and vegetated garden are proposed.
5	<u>For reserved matters and full applications</u>, an Ecological Mitigation Plan to be submitted containing (para 162): (i) Scaled drawing to show Details of replacement roosts.	The mitigation and compensation outlined in the Discussion section of the report will be of benefit to qualifying species. This section recommends sensitive working measures to ensure the stables are checked thoroughly for bats, and open points (e.g., the doorway) will be made inaccessible. The report also recommends appropriate lighting provisions,

	• Commuting routes and foraging habitat to be retained, created and enhanced. • Location/extent and full landscape specifications for tree and shrub planting, wildflower grassland etc. • Location of temporary work areas. • Limit of built development (ii) Schedule of works covering removal, enhancement and creation of habitat features in relation to timing of construction works. (iii) Detailed and scaled cross sections to accurately locate development and vegetation features	including the use of warm light sources with peak wavelengths higher than 550nm, and motion sensors. A dedicated bat loft will be created within the development to provide compensation for the loss of a potential feeding perch/night roost used by Greater Horseshoe and Brown Long-eared bats. Whilst this is not a like-for-like replacement (e.g., an open-fronted structure like the stables), this compensation is considered acceptable given that (i) no activity within the stables was recorded during the emergence surveys; (ii) bat activity (low level) was only recorded after the door had been blown open, i.e., the stables were not used previously as a permanent a roosting structure, and (iii) further enhancement for bats will be secured through the proposed tree and hedgerow plantings.
6	The EMP proposals submitted for item 5 above are in accordance with the standards for habitat mitigation and management as described at section 8.2 and Figure 6 in the TWBMS.	Yes, provided the above-mentioned mitigation is secured via a condition, should planning permission be granted.
7	<u>For Reserved Matters and Full applications</u>, CEMP to set out: • Location of temporary work areas. • Schedule of works covering removal, enhancement and creation of habitat features in relation to construction works. • Details of compliance arrangements and how staff will interface with Council TWBMS Project Officer. • Management of habitats during the construction phase.	Given the scale of the works, a full CEMP is not considered necessary. However, the mitigation detailed in the ecology report must be secured via a planning condition.
8	Application to demonstrate retained core bat habitat connects to the wider habitat network.	No bat foraging or commuting habitat will be lost, and a sensitive lighting scheme will be secured.
9	Application to demonstrate measure to ensure core bat habitat will remain relatively undisturbed by the effects of urbanisation.	Although the application is arguably for urban development (conversion to a dwelling), no bat foraging or commuting habitat will be lost, and a sensitive lighting scheme will be secured. The site lies on the edge of an existing residential urban area. Further, a contribution towards the council's strategic recreational pressure mitigation scheme will apply (see below).

10	<u>For Reserved Matters and Full applications</u>, LEMP to set out: • Plan showing extent of habitats which the Management Company will be responsible for • Management objectives for each habitat • 1 and 5 year schedules of management activities including replacement /restoration works where damage occurs. • Review mechanism	This is a minor application and a LEMP would not be proportionate to the proposals. Instead, ecological enhancements (as shown on the submitted plans) should be secured via a condition.
11	The potential impacts of lighting are adequately modelled and assessed with appropriate mitigation included to minimise the effects artificial lighting across the site in accordance with section 8.3.	A wildlife-sensitive lighting scheme must be secured via a condition.
12	An appropriate lighting monitoring regime has been provided.	As above.
13	Appropriate mechanisms for maintenance, monitoring and remediation of mitigation measures have been submitted covering relevant phases of development including the post construction period.	This is a minor application and securing monitoring would not be proportionate to the proposals.
14	Yellow Zone: The applicant agrees that a financial contribution towards the Council led scheme for mitigating residual effects from loss / degradation of bat habitat will be secured by S106.	For residential development, the strategic financial mitigation contribution is £972.00 per dwelling, which will be payable through s106, s111 or unilateral undertaking. At the current site, it is only the section of existing road at the western border that falls within the yellow zone. As such, there will be no loss of bat habitat within the yellow risk zone, and the yellow zone is not considered further.
15	Grey Hatched Zone: New residential development proposals in the grey hatched medium recreational risk zone will be expected to contribute towards the council's strategic recreational pressure mitigation scheme or	For residential development of 49 dwellings or less, a contribution of £925 per dwelling towards the council's strategic recreational pressure mitigation scheme is required, which will be payable through s106, s111 or unilateral undertaking. For this development, the cost of mitigation via the Council's strategic scheme will be £925 for the 1 dwelling.

	Deliver sufficient natural recreational focused space/ Suitable Alternative Natural Greenspace (SANG) [depending on the number of residential dwellings proposed].	
--	---	--

S106 requirements

1. £925.00 per dwelling to contribute towards the council's strategic recreational pressure mitigation scheme

Conditions:

1. Compliance with submitted documents

The development will be carried out in strict accordance with the following documents:

- 'Discussion and Conclusions' section of the Preliminary Ecological Appraisal and Bat Survey Report, Stark Ecology Ltd, December 2025 (including details of the bat loft, as marked on Figure 9)
- Bat roosting and bird nesting features, and new plantings, shown on:
 - Site Plan – Proposed, Tea Architects, 17/12/2025
 - Roof Plan – Proposed, Tea Architects, 17/12/2025
 - East and West Elevations – Proposed, Tea Architects, 17/12/2025
 - North and South Elevations – Proposed, Tea Architects, 17/12/2025

REASON: For the avoidance of doubt and for the protection, mitigation and enhancement of biodiversity.

2. Artificial Lighting

No external lighting shall be installed on site until plans showing the type of light appliance, the height and position of fitting, illumination levels and light spillage have been submitted to and approved in writing by the Local Planning Authority. The plans will be in accordance with the appropriate Environmental Zone standards set out by the Institution of Lighting Professionals (ILP) Guidance Notes on the Avoidance of Obtrusive Light (GN 01/2021) and Guidance note GN08/23 "Bats and artificial lighting at night", issued by the Bat Conservation Trust and Institution of Lighting Professionals. The approved lighting shall be installed and maintained in accordance with the approved details and no additional external lighting shall be installed.

REASON: In the interests of the amenities of the area, to minimise unnecessary light spillage above and outside the development site and to ensure lighting meets the requirements of the Trowbridge & Westbury Bat Mitigation Strategy.

CONCLUSION	
Is the project likely to affect site integrity?	
a) Alone?	No
b) In combination with other	No

plans or projects?	
Recommendation:	
The Appropriate Assessment concludes no adverse impacts on the SAC site. The application can therefore be positively determined, subject to suitable mitigation measures being secured by condition and implemented.	
Name of officer(s) making the assessment	Abi Gazzard (Ecologist) Natural & Historic Environment Wiltshire Council
Date:	26/01/2026
Natural England Comments	
Name of Natural England officer Date:	