

Shadow Habitat Regulations Assessment (sHRA)

Blind Lane, Southwick, Trowbridge,
Wiltshire

19 February 2026

Ecology
Arboriculture
Land Management





Site Details

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1 Introduction

This report has been prepared on behalf of Wain Homes Severn Valley in relation to a proposed planning application at Blind Lane, Southwick, Trowbridge, Wiltshire.

The area within the application boundary is hereafter referred to as the 'Site'. A separate Ecological Impact Assessment (EcIA) has been produced (GE Consulting, 2025) and accompanies the planning application.

1.1 Description of Proposed Development

The applicant is seeking full planning permission for 90 residential units and associated landscaping, access, roads and parking.

1.2 Aims

This shadow Habitats Regulations Assessment (sHRA) has been produced to provide Wiltshire Council with technical information required to assess whether the project (i.e. the proposed scheme) may have an adverse impact on the integrity of any National Site Network (NSN) site (also known as European sites'), either alone or in combination with other plans or projects in the local area as part of their responsibility as the 'competent authority' under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended).

The aims of this reports are to:

- 👉 Identify those National Site Network sites that fall within the potential Zone of Influence (Zoi) of the proposed scheme, by way of consideration of their qualifying interests, conservation objectives and favourable (or otherwise) conservation status;
- 👉 Identify any effects/impacts of the proposed scheme that are likely to have likely significant effects (LSEs) on the identified National Site Network either alone or in-combination; and,
- 👉 Identify ways in which the proposed scheme can be modified to avoid/mitigate impacts on the National Site Network to an acceptable level.

This sHRA is based on the Site layout and landscape proposals and should be read in conjunction with the corresponding application documents and drawings submitted with the planning application, in particular:

- 👉 Ecological Impact Assessment (EcIA) – GE Consulting. Ref 2102-EcIA-AG. January 2026.
- 👉 Proposed Site Plan – Place by Design. Ref 2056_1100 Planning Layout. January 2026.
- 👉 Landscape Proposals – ACD Environmental. Ref WAIN24897-11 Sheet 1-5. January 2026.
- 👉 Lighting plans – WLC Lighting Design. Ref WLC1460-LC-AC-001 R0. January 2026.

2 HRA Requirement

2.1 National Site Network

European Council Directive 92/43/EEC (known as the Habitats Directive) and Council Directive 2009/147/EC (codified version of Directive 79/409/EEC as amended) ‘the Wild Birds Directive’ established a network of internationally important sites (i.e. Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)) designated for their ecological status. Special Areas of Conservation¹ are designated under the Habitats Directive and promote the protection of flora, fauna and habitats. Special Protection Areas are designated under the Birds Directive in order to protect rare, vulnerable and migratory birds. These sites form a Europe-wide network of designated sites known as ‘Natura 2000’

In the UK, these formerly EU-protected sites have been merged into a National Site Network by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.

In addition to sites designated under the above legislation, UK Government policy (NPPF paragraph 194 and Circular 06/2005 refer) states that ‘potential’ SPAs, ‘possible’ SACs and internationally important wetlands listed under the Ramsar Convention 1971 (Ramsar sites) are afforded the same protection as SPAs and SACs for the purpose of considering development proposals that may affect them.

The term ‘Habitats Regulations Assessment’ is used to cover the process of assessing the effects of a project or plan on National Site Network sites and Ramsar sites.

2.2 Legislative Context

The Conservation of Habitats and Species Regulations 2017 (as amended) provides protection to the National Site Network.

Under Part 6 ‘Assessment of Plan and Projects’, Regulation 63 (1) of these regulations, an appropriate assessment needs to be undertaken by the competent authority in respect of any plan or project which:

- 👉 *“Is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects); and,*
- 👉 *Is not directly connected with or necessary to the management of that site”.*

As the application is not necessary to the management of the site for nature conservation, Wiltshire Council, as the relevant competent authority, is required to carry out an HRA to ensure that the development decision does not adversely affect the integrity of National Site Network.

2.3 HRA Process

Habitats Regulations Assessment follows a four-stage hierarchical approach. Each of those four stages contains a number of steps comprising the tests or procedures that are required by the Habitats Directive.

The definitive process for HRA is detailed in the Handbook for HRA (Tyldesley, D., and Chapman, C., 2013). The Handbook was intended to supplement government guidance (on GOV.UK) by bringing together all relevant law, policy, methodology, technical advice and good practice into one comprehensive source. Following the accession of the Planning and Infrastructure Bill in 2025 and UK

¹ Those sites that have been adopted by the European Commission and formally designated by the government of each country in whose territory the site lies.

Government Policy to seek to adapt the HRA process to facilitate development, the publishers of the Handbook – DTA Publications has elected to withdraw the handbook as of January 2026.

The justification for this being that the regulatory and assessment landscape will become ever more complex, with many individual sectors each having their own way of avoiding or adapting the HRA process, whilst the Regulations themselves are retained, with or without amendments. As such as it is not a viable proposition to adapt and maintain the Handbook as a resource that would be needed to adequately navigate through all the relevant processes in England.

Until the new processes become clear and guidance is published, the handbook will be followed in the interim, with ecologists fully cognizant of the risks of misapplying the regulatory process as it unfolds.

The HRA comprises:

- 🦋 An initial assessment, ‘screening’, of whether the proposal either alone or in combination with other plans or projects is likely to have a significant effect on the National Site Network. This screening process is focused on the ‘Likely Significant Effect’ (LSE) test. This is essentially a risk assessment process that seeks to understand whether there are any mechanisms for identified impacts arising from the project to adversely affect the National Site Network (e.g. cause-effect pathway); and,
- 🦋 If a likely significant effect cannot be ruled out, an Appropriate Assessment to determine whether the proposal will adversely affect the integrity of the National Site Network.

A significant effect can be defined as an ‘effect that is likely to undermine the site’s conservation objectives’.

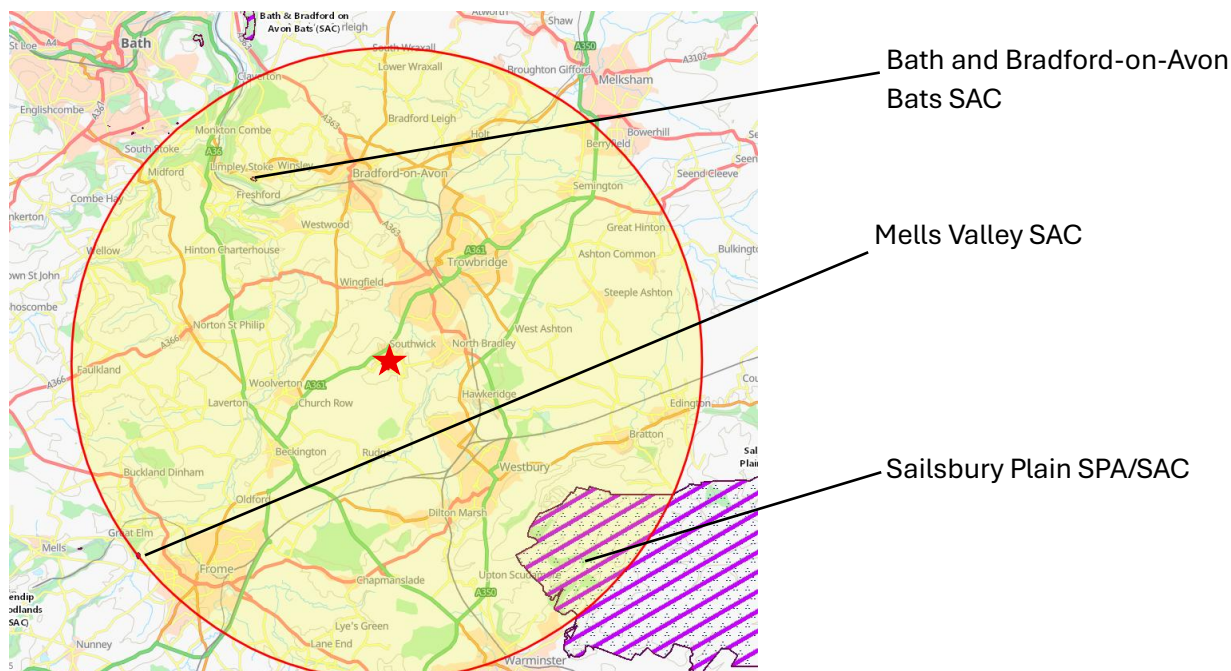
Following the People Over Wind ruling (case C323/17) in April 2018, ‘it is not appropriate, at the screening stage, to take account of the measures intended to avoid or reduce the harmful effects of the plan or project on that site’ and therefore this screening is undertaken in the absence of standard mitigation.

3 Sites Scoped Into Assessment

Three National Site Network sites lie within 10km of the Site and have been scoped into the assessment:

- 📍 Sailsbury Plain SPA/SAC;
- 📍 Bath and Bradford-on-Avon Bats SAC; and,
- 📍 Mells Valley SAC

National Site Network locations in relation to the Application Site (indicated by the red star) are shown below (provided by MAGIC²).



The proposed development was not considered to have effects on the National Site Network beyond 10km as no potential pathways have been identified.

4 Screening Assessment

4.1 Factors Affecting NSN sites

The Assessment takes into account the current state of the National Site Network, the main sensitivities and the range and scale of potential impacts from the proposed development.

During the screening exercise, Standard Data Forms produced by JNCC have been used to identify threats, pressures and activities with high impacts on the site's designated features. In addition, Site Improvement Plans (SIPs) which have been developed by Natural England for each site, have been used to identify current and predicted issues affecting the condition of the qualifying features.

4.2 Likely Significant Effect (LSE) Test

Table 1 below details the characteristics of the National Site Network and identifies potential pathways for LSEs as a result of the proposed development.

² <https://magic.defra.gov.uk/home.htm>



The assessment process found that the proposed development will not involve any direct land take of any of the National Site Network, however indirect LSEs on the Salisbury Plain SPA/SAC, Bath and Bradford-on-Avon SAC and the Mells Valley SAC cannot be ruled out.

Table 1: Screening Assessment for LSEs

Site Name	Distance from Site	Qualifying Features ³	Conservation Objectives ⁴	SSSI Condition Assessment	Threats, pressures and activities with negative impacts on the site (taken from Standard Data Form and SIP ⁵)	Risk of Significant Effect?
Salisbury Plain SAC/SPA	6.7km south east	21465.94 ha site comprising heath, scrub, maquis and garrigue, phygrana, dry grassland, steppes, humid grassland, mesophile grassland, improved grassland, broad-leaved deciduous woodland, coniferous woodland, mixed woodland and other land (including towns, villages, roads, waste places, mines, industrial sites). Annex I habitats that are a primary reason for	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 qualifying natural habitats and habitats of qualifying species - The structure and function (including typical species) of qualifying natural habitats - The structure and function of the habitats of qualifying species - The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely - The populations of qualifying species, and, - The distribution of qualifying species within the site.	Salisbury Plain SSSI 45.27% favourable 53.33% unfavourable-recovering 0.96% partially destroyed 0.45% not recorded Porton Down SSSI 14.80% favourable 85.20% unfavourable-recovering Parsonage Down SSSI	Changes in species distribution Air pollution: risk of atmospheric nitrogen deposition	No - the development will likely cause an increase in traffic and therefore atmospheric nitrogen deposition, however due to the distance between the development site and the SAC, and the size of the development it is highly unlikely to result in an LSE. Additionally, the Site falls outside of the Recreational

³ <https://sac.jncc.gov.uk/#>

⁴ <https://designatedsites.naturalengland.org.uk/>

⁵ <https://publications.naturalengland.org.uk/category/5458594975711232>

Site Name	Distance from Site	Qualifying Features ³	Conservation Objectives ⁴	SSSI Condition Assessment	Threats, pressures and activities with negative impacts on the site (taken from Standard Data Form and SIP ⁵)	Risk of Significant Effect?
		selection of this site:  <i>Juniperus communis</i> formations on heaths or calcareous grasslands  Semi-natural dry grasslands and scrubland facies on calcareous substrates (<i>festuco-brometalia</i>) Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:  N/A Annex II species that are a primary reason for selection:		 78.65% favourable  21.35% unfavourable-recovering		Buffer Zone therefore there will be no recreational impact. Development is highly unlikely to impact on other pressures/threats listed.

Site Name	Distance from Site	Qualifying Features ³	Conservation Objectives ⁴	SSSI Condition Assessment	Threats, pressures and activities with negative impacts on the site (taken from Standard Data Form and SIP ⁵)	Risk of Significant Effect?
		 Marsh fritillary butterfly Annex II species present as a qualifying feature:  N/A				
Bath and Bradford-on-Avon Bats SAC	7.16km north west	106.45 ha site comprising heath, scrub, maquis and garrigue, phygrana, broad-leaved deciduous woodland and other land (including towns, villages, roads, waste places, mines, industrial sites). Annex I habitats that are a primary reason for selection of this site:  N/A Annex I habitats present as a qualifying feature,	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.	Box Mine SSSI  100% favourable Brown's Folly SSSI  75.01% favourable  24.99% unfavourable-recovering Combe Down and Bathampton Down Mines SSSI  98.51% favourable  1.49% unfavourable-recovering	Planning permission: general Change in land management Direct impact from third party Feature location/extent/condition unknown Offsite habitat availability/management Public access/disturbance Change to site conditions	Yes - a change in land management is to occur, offsite habitat availability/ management is going to change, and public access/ disturbance may increase due to the proposed development. The Site lies within the Yellow Zone: Medium Risk sensitivity zone for habitat and the Grey Hatched Zone

Site Name	Distance from Site	Qualifying Features ³	Conservation Objectives ⁴	SSSI Condition Assessment	Threats, pressures and activities with negative impacts on the site (taken from Standard Data Form and SIP ⁵)	Risk of Significant Effect?
		but not a primary reason for selection of this site: 🦇 N/A Annex II species that are a primary reason for selection: 🦇 Greater horseshoe bat 🦇 Bechstein's bat Annex II species present as a qualifying feature: 🦇 Lesser horseshoe bat		Winsley Mines SSSI 🦇 100% favourable	Inappropriate designation boundary	Medium Risk sensitivity zone for recreational pressure of the Trowbridge and Westbury Bat Mitigation Strategy (TWBMS). Development is highly unlikely to impact on other pressures/threats listed.
Mells Valley SAC	9.9km south west	28.77ha of humid grassland, mesophile grassland, improved grassland, broad-leaved deciduous woodland and other land (including towns, villages, roads, waste	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 qualifying natural habitats and habitats of qualifying species 🦇 The structure and function (including typical species) of qualifying natural habitats	Old Ironstone Works, Mells SSSI 🦇 100% unfavourable-no change St. Dustan's Well Catchment SSSI 🦇 78.87% favourable	Public access/disturbance Wildfire/arson Direct impact from third party Undergrazing Inappropriate designation boundary	Yes - potential increase in public access/disturbance. Development is highly unlikely to impact on other pressures/threats listed.

Site Name	Distance from Site	Qualifying Features ³	Conservation Objectives ⁴	SSSI Condition Assessment	Threats, pressures and activities with negative impacts on the site (taken from Standard Data Form and SIP ⁵)	Risk of Significant Effect?
		places, mines and industrial sites). Annex I habitats that are a primary reason for selection of this site:  N/A Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:  Semi-natural dry grasslands and scrubland facies on calcareous substrates  Caves not open to the public Annex II species that are a primary reason for selection:	 The structure and function of the habitats of qualifying species  The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely  The populations of qualifying species, and,  The distribution of qualifying species within the site.	 2.48% unfavourable-recovering  18.65% unfavourable-declining Vallis Vale SSSI  33.03% favourable  66.97% unfavourable-recovering	Air pollution: impact of atmospheric nitrogen deposition	The Site does not fall within a consultation zone for the Mells Valley SAC,

Site Name	Distance from Site	Qualifying Features ³	Conservation Objectives ⁴	SSSI Condition Assessment	Threats, pressures and activities with negative impacts on the site (taken from Standard Data Form and SIP ⁵)	Risk of Significant Effect?
		 Greater horseshoe bat Annex II species present as a qualifying feature:  N/A				

5 Information for Appropriate Assessment

5.1 Bath and Bradford-on-Avon Bats SAC Existing Condition

Greater Horseshoe Bats (GHS): This site in south-west England is selected on the basis of the size of population represented (up to 15% of the UK population). The Winsley Mine SSSI recorded counts of up to 100 hibernating GHS, representing c. 5% of the UK population in this site alone. In 1985, according to the Supplementary Advice on Conserving and Restoring Site Features (Natural England, 2019), a peak count of 56 bats was counted.

Roost choice, and the presence of bats within the SAC, is likely to be influenced by the site's ability to provide bats with food and shelter. The woodland surrounding the underground mines is important for the maintenance of optimal humidity conditions inside the mine system and also as foraging areas. Beyond this, GHS rely on the maintenance of supporting offsite habitats (functionally linked land). The provision of rich feeding areas around a roost, and the commuting routes (or flight-lines) to them, are an important element in sustaining the SAC population. Flightlines extend beyond the designated site boundary into the wider local landscape and are especially important as a link between summer and winter roost sites. GHS commute and forage along linear features, over grazed pasture and in woodland.

Permanent pasture and ancient woodland linked with an abundance of tall bushy hedgerows is ideal supporting habitat for this species. GHS tend to forage within 2.5km of their summer roost, though they can travel up to 4km from these roosts to suitable foraging grounds (Schofield, 2008), with distances up to 8km recorded during the maternity period (Billington, 2003). In winter, their foraging range is reduced, with a mean foraging radius of 1.2km around hibernation sites reported.

The bats are vulnerable to the loss of insect food supplies due to insecticide use, changing farming practices and the loss of broad-leaved tree-cover, and to the loss or disturbance of underground roost sites.

Lesser Horseshoe Bats (LHS): The main population of LHS is at Box Mine SSSI, with a hibernating population of 197 (peak count – Jan 2014) (Natural England, 2019). A smaller population is present at Winsley Mine SSSI, c. 6 individuals recorded (peak count – Dec 1984) (Natural England, 2019). As with GHS, roost choice and the presence of bats within the SAC, is likely to be influenced by the site's ability to provide bats with shelter and food (supporting habitat). LHS tend to forage within 2-3km of their roost, though they can travel up to 4km from their roosts to suitable foraging grounds. LHS commute and forage along linear features over grassland and woodland. They feed on flies (mainly midges), small moths, caddis flies, lacewings, beetles, small wasps and spiders. The species prefers sheltered valleys with extensive deciduous woods or dense scrub, close to roost sites. Where habitat is fragmented, linear features such as hedgerows are important corridors between roosts and foraging areas. During the winter, their foraging range is reduced, with a mean foraging radius of 1.2km around hibernation sites reported. Summer and winter roosts are usually less than 5-10km apart.

LHS are vulnerable to the loss or disturbance of both summer and winter roost sites and the removal of linear habitat corridors.

Bechstein's Bats: The main populations of Bechstein's bat are at Box Mine SSSI and Brown's Folly, although recorded numbers are low (Natural England, 2019). There are no records of Bechstein's bats at either Winsley Mines SSSI or Combe Down and Bathampton SSSI. Similarly to the horseshoe bats, roost choice and the presence of bats within the SAC, is likely to be influenced by the site's ability to

provide bats with shelter and food (supporting habitat). Roosts are usually tree holes during the summer and exposed sites with caves, cellars or tree holes during the winter⁶

Bechstein's bats tend to forage near to their roost sites and rarely travel more than 1.5km to find suitable foraging grounds⁷. They forage largely in enclosed vegetation such as woodland and feed mainly by gleaning flies, earwigs and moths.

The species prefers damp, deciduous woodland although they may be found in parkland and coniferous woodland. Where habitat is fragmented, linear features such as hedgerows are important corridors between roosts and foraging areas. Bechstein's bats are vulnerable to the loss or disturbance of suitable habitat, e.g. by removal of dead/dying trees, habitat fragmentation and drainage of wet woodlands.

5.2 Mells Valley SAC Existing Condition

Mells Valley in southern England is selected on the basis of the size of its exceptional breeding population of greater horseshoe bat. It contains the maternity site associated with a population comprising about 12% of the UK greater horseshoe bat population (JNCC, 2015). A proportion of the population also hibernates at the site. However, the maternity population is at Wadbury House, outside the designated site (Burrows, 2019). Nonetheless this site is integral to the SAC population and was counted as hosting approximately 300 greater horseshoe bats and 100 pups in the summer of 2015 (Burrows, 2019). The Old Ironstone Works, which is designated as a SSSI, is likely to be a hibernation roost (Burrows, 2019). Many Greater Horseshoe bats disperse to other hibernacula through the Mendips to Cheddar and some as far as Bath, Brockley Hall and perhaps Woodchester Mansion in Gloucestershire. Fairy Cave is one of the main sites in the Mendips (Burrows, 2019). Other hibernation sites remain unknown.

The component sites for the Mells Valley SAC are:

- 📍 Vallis Vale SSSI;
- 📍 Old Ironstone Works SSSI; and,
- 📍 St. Dunstan's Well Catchment SSSI.

The application Site lies c.9.9km northeast of St. Dunstan's Well Catchment SSSI. This component support the qualifying features 'caves not open to the public', 'semi-natural dry grasslands and scrubland facies: on calcareous substrates (Festuco-Brometalia)' and 'Greater Horseshoe Bats'. The other components of the SAC, Vallis Vale SSSI and Old Ironstone Works SSSI lie c. 10km southwest and c. 11.5km southwest from the Site.

Caves not open to the public: Caves not open to the public is interpreted as referring to natural caves which are not routinely exploited for tourism, and which host specialist or endemic cave species or support important populations of Annex II species. The Site Improvement Plan identifies public access/disturbance as a pressures and/or threats to this feature⁸.

Greater Horseshoe Bats (GHS): Mells Valley in southern England is selected on the basis of the size of its exceptional breeding population. It contains the maternity site associated with a population comprising about 12% of the UK greater horseshoe bat population. A proportion of the population also hibernates at the site, though other hibernation sites remain unknown.

⁶ <https://www.bio.bris.ac.uk/research/bats/britishbats/batpages/bechsteins.htm>

⁷ <https://cdn.bats.org.uk/uploads/pdf/Bechsteins-bat-species-account.pdf?v=1642079639>

⁸ <https://publications.naturalengland.org.uk/publication/4665580590202880>

5.3 Trowbridge and Westbury Bat Mitigation Strategy (TWBMS)

As part of the Trowbridge and Westbury Bat Mitigation Strategy, Bat Sensitivity Zones have been developed with regards to habitat suitability and recreational pressures. The Site lies within the Yellow Medium Risk Sensitivity Zone and Grey Hatched Medium Risk Sensitivity Zone for recreational pressures.

Furthermore, the strategy states that: *“Significant potential effects to the SAC therefore include impacts to the foraging areas and commuting routes in the surrounding landscape used by the bats as well as roosts and can include:*

-  *Habitat degradation - alteration / demolition / removal of a potential roost feature including changes to environmental conditions (temperature, humidity, internal light levels etc); loss, damage or change of management of potential foraging habitat; or removal / fragmentation / modification of habitats in a potential commuting corridor;*
-  *Lighting – increased artificial lighting affecting potential roosting, foraging, commuting features as well as insect availability;*
-  *Noise and vibration – construction / demolition activities close to potential roost features;*
-  *Recreational disturbance – increasing the risk of recreational visits, both organised and informal. This can result in impacts such as: trampling of vegetation, leading to changes in species composition, loss of vegetation and erosion; disturbance from the presence of people and their activities; ‘general’ urban effects: dumping of waste, damage, vandalism, fires; and spread of plants including alien species.*
-  *Pollution – dust and fumes close to potential roost features; and*
-  *Mortality – e.g. predation by domestic cats at roost entrances, collision risk from road traffic and wind turbines.*

5.3.1 Sensitivities: Bath and Bradford-on-Avon Bats SAC

The Site Improvement Plan states that the main threats to greater horseshoe, Bechstein’s bat and lesser horseshoe are as follows:

-  Planning permission: general
-  Change in land management
-  Direct impact from third party
-  Feature location/extent/condition unknown
-  Offsite habitat availability/management
-  Public access/disturbance
-  Change to site conditions
-  Inappropriate designation boundary

5.3.2 Sensitivities: Mells Valley SAC

The Site Improvement Plan states that the main threats to greater horseshoe are as follows:

-  Public access/disturbance
-  Wildfire/arson
-  Direct impact from third party
-  Undergrazing
-  Inappropriate designation boundary
-  Air pollution: impact of atmospheric nitrogen deposition

5.4 Use of the Proposed Development Site by Bats

5.4.1 Foraging and Commuting

Automated activity surveys and night-time bat walkover (NBW) surveys were conducted which have been summarised and the impacts assessed within the Ecological Impact Assessment (GE Consulting, 2026). Automated surveys were conducted at least once a month for one working week from April – October. NBW surveys were also conducted at least once a month between April – October.

During the NBW surveys, Annex II species (greater horseshoe and lesser horseshoe) and *Myotis* sp., were recorded in low numbers, with a total of two GHS registrations (May and September), 15 LHS registrations (May and July) and 14 *Myotis* sp., registrations (May and June).

The automated detector surveys recorded greater horseshoe (126 total passes, 0.55% of all passes), lesser horseshoe (67 passes, 0.429%) and *Myotis* sp., (679 passes, 2.86%). Registrations for greater horseshoe, lesser horseshoe and *Myotis* sp., were recorded in every month of the surveys.

Greater horseshoe and lesser horseshoe bats showed a greater affinity with the south-eastern boundary, where the watercourse is present, with an average of 0.9 passes a night per species. *Myotis* sp. were recorded most frequently along the northwestern boundary, with an average of 6 passes per night.

5.4.2 Roosting

Six trees were identified on Site as having bat roosting potential, three with potential for individual bats and three with potential for multiple bats. These trees are within H1, H2 and H3, details can be found within the Ecological Impact Assessment (GE Consulting, 2026). These features could be utilised by Bechstein's bats.

5.5 Identification of Potential Impact Pathways

5.5.1 Bath and Bradford-on-Avon Bats SAC

Considering the vulnerabilities of GHS, Bechstein's and LHS bats as described above, the development may result in potential effects to the Bath and Bradford-on-Avon SAC as identified in the Bats Special Areas of Conservation (SAC): Planning Guidance for Wiltshire (2015) by:

- 🦇 Direct loss of foraging/commuting habitat
- 🦇 Loss/disruption of commuting/foraging routes (flight lines) through indirect impacts such as lighting
- 🦇 Disturbance during construction works.

5.5.2 Mells Valley SAC

Somerset Ecology Services, working in partnership with the former district authorities of Somerset published the Mells Valley SAC Guidance on Development, to give a clear approach to considering impacts of development on the SAC (Burrows, 2019).

The guidance sets out 'Bat Consultation Zones' where GHS may be found, divided into bands reflecting the likely importance of the habitat and proximity to roosts. Band A is within 2200m of a maternity roost and forms important foraging for juveniles. Band B is 2201m – 4000m from the maternity roost, or 0 – 610m from other known roosts. Band C is 4001m – 8000m from the maternity roost or 611 – 2440m from other roosts.

The development proposals do not lie within any of the bands. However, greater horseshoe bats are known to travel up to 8km from maternity roosts to foraging areas by adult bats (Billington, G. 2003).

5.5.3 Habitat Loss/Fragmentation

Substantial broad hedgerows with frequent emergent trees can provide suitable structure for foraging conditions for greater horseshoe bats where woodland is scarce. A tall thick hedgerow is a very efficient way of producing a maximum level of insect prey using a minimum land area and are important creators of physical conditions that enhance insect concentrations and reduce wind speeds for economical hunting flight.

As discussed above, greater horseshoe, lesser horseshoe and *Myotis sp.* are using the Site to commute and forage. In the absence of mitigation, the proposed development has the potential to affect commuting and foraging bats through the severance of commuting/foraging routes due to hedgerow removal resulting in bats using less energy-efficient routes (Russ & Montgomery 2002) or abandoning roosts/foraging areas altogether.

The proposed development would result in the direct loss of 4.17ha of arable cropland, 0.17ha modified grassland and c. 13m of hedgerow.

The scheme has been designed to retain and enhance unlit green corridors around the Site which can be used by foraging and commuting bats, allowing them to continue to move through and around the Site between offsite roosts and foraging grounds. All hedgerows within the Site are set to be retained and protected with only a small section of H5 to be removed to facilitate access onto the Site. The watercourse and hedgerow to the south-east of the Site (H2), where bat activity was concentrated, will become a 10m wide dark buffer zone and a 15m new core bat habitat as outlined in the TWBMS (Wiltshire Council, 2025). A hedgerow will be planted parallel to H2 to form the dark corridor and managed alongside the new core bat habitat sensitively for horseshoe bats. Furthermore, across the Site additional tree, scrub, pond creation and grassland planting proposed will enhance the Site for foraging bats.

The Statutory Biodiversity Metric has confirmed that no net loss of habitat is to occur within the Site boundary (Ref: 2102-BNG-AG and 2102-SBM-AG). This is being achieved by the creation of other neutral grassland, orchard, mixed scrub, modified grassland, individual trees, native hedgerow and species-rich hedgerow planting. The landscaping proposed will provide suitable foraging habitat and strengthen the already existing corridors through the Site.

Additionally, under the TWBMS a financial contribution of £972.03 per dwelling will need to be made towards funding the LPA scheme for mitigating residual in-combination effects from loss/degradation of bat habitat. This would result in a cumulative contribution of £87,482.70 to be secured via section 106 agreement (s106), a section 111 agreement (s111) or unilateral undertaking (UU).

A Landscape and Ecological Management Plan (LEMP) will be produced detailing the methods and strategies to manage the new grassland areas, new and retained hedgerows, ponds, orchard, scrub and tree planting as described above, as well as providing details of the funding mechanisms and timescales for management. As required by the 'Guidance on Development', habitats will be managed for GHS, LHS and Bechstein's and Biodiversity Net Gain (BNG) in perpetuity.

Due to the distance from the closest component of the Mells Valley SAC being 9.9km to the south-west, it is unlikely that greater horseshoe bats associated with this SAC are foraging/commuting through the Site. **As such, no Adverse Effect on Integrity (AEOI) is anticipated on Mells Valley SAC qualifying features through the loss of foraging/commuting habitat.**

Taking the above mitigation and enhancements into account, it is considered that, with mitigation, there will be **no adverse impacts to the conservation status of the GHS, LHS and Bechstein's bat associated with the Bath and Bradford-on-Avon Bats SAC through loss of foraging habitat as a result of the development.**

5.5.4 Loss of Roosting Habitat

As there is no evidence of, or potential for roosting horseshoe bats within the Site, the scheme will not directly impact upon the Mells Valley SAC and its integral roosts. **As such, no Adverse Effect on Integrity is anticipated on Mells Valley SAC qualifying features through loss of roosting habitat.**

H1, H2 and H3 all have trees with bat roosting potential, see the Ecological Impact Assessment for details (GE Consulting, 2026). These hedgerows will all be buffered to help retain connectivity between trees with bat roosting potential and the wider landscape. H1 will have a 6m buffer, H2 a 25m buffer, H3 as wide as a 46m buffer in places and H5 will have, on average, a 5m buffer.

A tree within H2 (T18) was identified as having potential for roosting bats during the walkover survey undertaken in January 2024 and updated in January 2025. This tree was removed without ecology supervision in November 2025 due to health and safety concerns around ash dieback and the proximity of an overhead cable. However, due to the context of this tree (being within a hedgerow and not within or connected to a woodland), it is not considered to have potential for roosting Bechstein's bats. Whilst there will be a change in habitat surrounding trees with roosting potential, the impact of this is considered to be minimal providing adequate buffers are provided in-line with the above measures and adhered to. It can therefore be concluded **there will be no AEOI to the GHS, LHS or Bechstein's bat populations associated with the Bath and Bradford-on-Avon Bats SAC as a result of impacts to roosting habitats.**

5.5.5 Lighting

All three species associated with the Bath and Bradford-on-Avon SAC and therefore also the Mells Valley SAC are generally light-averse woodland specialists, preferring to commute/forage within woodlands, along the edges of woodland or along woodland glades/rides. Lighting levels of under 0.5lux are required to ensure continued use of commuting routes (Stone, 2013) (unless baseline conditions already exceed this level). Lighting can cause avoidance of commuting routes and a change in the abundance of available insect prey. Fragmentation via lighting can cause bats to fly further to reach foraging grounds which could result in increased energetic costs, higher risk of predation and roost abandonment (Stone, 2013).

In the absence of mitigation, lighting within the new development has the potential to cause disruption or loss of these commuting/foraging routes and as such it is considered that, **in the absence of mitigation, the development could have a permanent adverse effect on the local populations of all three species.**

A Lighting Strategy (WLC Lighting Design, 2026) has been developed in accordance with the ILP Guidance Note 08/01/ on Bats and Artificial Lighting and TWBMS (Wiltshire Council, 2025). Whilst a certain level of lighting throughout the Site is necessary for the health and safety of future residents, the strategy includes measures to reduce the impact of this lighting on local fauna including the identification of sensitive zones to ensure darker areas are maintained/created to protect important commuting and foraging routes. Lighting within these areas will be kept to an absolute minimum.

The lux levels within the Zone A new core bat habitat will be completely unlit and subject to no light-spill (WLC Lighting Design, 2026) and therefore achieving the less than 0.2 on the horizontal plane and less than 0.4 on the vertical plane as required by the TWBMS (Wiltshire Council, 2025). The Zone B dark

buffer zone will have light levels below 1 lux. Hedgerow H5 will be subject to minimal light-spill in areas of up to 1 lux. Brighter lighting within the centre of the Site, associated with houses, parking spaces and primary footpaths will be directional with no upward spill.

As such, it is considered that, with the mitigation described above, there will be **no adverse impacts to the conservation status of the GHS, LHS and Bechstein's populations from the designated site as a result of fragmentation of flight lines through lighting.**

5.5.6 Recreational Pressures

The TWBMS highlights the potential for increased recreational pressures on woodlands which support bats associated with the Bath and Bradford on Avon Bat SAC. As such a ZOI has been developed around these roosts (the Grey Hatched Zone) within which, new residential development is expected to result in increased recreational pressure (and therefore adverse effects) on key woodland bat sites. The TWBMS requires that *“New residential development proposals for 50 or more houses within this zone will be expected to provide mitigation in the form of SANG / sufficient natural recreational focused greenspace; and new residential development proposals for less than 50 dwellings within this zone will be expected to make a financial contribution towards the delivery of strategic mitigation to address recreational pressure on the woodland sites”*.

Suitable Alternative Natural Greenspaces (SANGs) is the term given to greenspaces that are created or enhanced with the specific purpose of absorbing recreation pressure that would otherwise occur at designated nature conservation site, particularly European wildlife sites. SANGs are created, or existing greenspaces enhanced to create a SANG, in order to mitigate for the effects of new housing development, absorbing the level of additional recreation pressure associated with the new development.

The Draft Local Plan puts forward site allocations for major residential development in Trowbridge and Westbury which have potential to increase recreational / visitor pressure on the woodlands that support Bechstein's bats, two strategic SANGs have likewise been allocated in the draft Local Plan; one in Trowbridge and one in Westbury. The strategic SANGs / Country Parks proposed in Trowbridge and Westbury have been allocated by means of Policy 54: North Trowbridge Country Park and Policy 63: Westbury Country Park respectively.

The location of the strategic SANGs / Country Parks has been selected so as to maximise the potential for use by new residents of the site allocations in Trowbridge and Westbury put forward in the draft Local Plan and will be located between the strategic site allocations for major residential development and the closest woodlands that support Bechstein's bat roosts. This is to ensure that the SANGs / Country Parks are appropriately located to intercept residents that may otherwise visit the woodlands.

The allocated SANGs / Country Parks will be designed to provide attractive greenspace alternatives to the sensitive woodlands. The sites accord with the requirement for 8 hectares of open greenspace per 1,000 new residents / people as detailed in guidelines on SANG creation and has been based on the average of 2.4 people per household. Further to this Appendix 1 of the TWBMS provides SANG design standards which requires SANGs to be in the order of 30ha in size. Such SANG cannot be delivered on a Site-by-Site basis and needs to be delivered strategically as per the wider national approach to recreational pressures on European Sites (i.e. Thames Basin Heaths SPA, Cotswold Beechwoods SAC, Severn Estuary SPA, Dorset Heaths SPA etc).

Based on the number of dwellings proposed via this application (90) this results in an average occupancy level of 216 residents. As such the scheme should require c. 1.728ha of SANG or 'sufficient natural recreational focused greenspace'. The total site area is only 4.34ha in extent, so this figure

accounts for 39.8% of the total site area. When taking the aforementioned habitat mitigation which accounts for c. 0.34ha of the Site, this would leave c. 2.27ha remaining for scheme proposals.

Whilst the scheme will include extensive areas of greenspace (both for wildlife and for recreational uses), it is considered disproportionate and unfeasible to deliver SANG on site, and it is anticipated that the applicant would provide financial contributions to Wiltshire Council via s106/s111/UU at the rate as outlined in the TWBMS of £925 per dwelling. For 90 dwellings this would total £83,250.

As such, it is considered that, with the mitigation described above, there will be **no adverse impacts to the conservation status of GHS, LHS or Bechstein's bats from the designated sites as a result of the an increase in recreational pressures.**

5.5.7 Impacts During the Construction Phase

There is a risk of temporary disturbance to the GHS, LHS and Bechstein's bats using the Site during the construction phase through noise and light disturbance, resulting in a direct temporary adverse effect.

Construction will be restricted to daylight hours, finishing at least 30 minutes before sunset and commencing at least 30 minutes after sunrise between April 1st and October 31st. If this is not possible, no construction lighting will be allowed to spill onto the hedgerows on Site, ensuring light adverse species, such as GHS and LHS, can continue to utilise the Site during the construction phase.

A Construction Ecological Management Plan (CEMP) will be produced providing details and mechanisms through which the Site will be protected during the construction phase.

As such, it is considered that, with the mitigation described above, there will be **no adverse impacts to the conservation status of GHS, LHS or Bechstein's bats from the designated sites as a result of the development during the construction phase.**

6 Cumulative Assessment

Cumulative assessment (In-combination assessment) is a key part of the HRA process as it seeks to identify whether any residual effects below the threshold for AEOI but where plans or project could cumulatively result in an AEOI upon a designated site.

The key cumulative development impacts are the potential for loss of foraging areas, increased habitat disturbance, and general deterioration from urban impacts – noise and light pollution.

It is considered that, providing the mitigation measures described above are implemented and adhered to, there will be no residual effects as a result of this development. As such, **no in-combination effects are anticipated**, and no further assessment has been undertaken.

7 Summary Assessment & Conclusions

A Likely Significant Effect was identified for direct loss of foraging habitat, direct loss of roosting habitat, loss/disruption of commuting/foraging routes through indirect impacts such as lighting, disturbance during construction phase and increase in recreational pressures of woodlands associated with the SACs arising from the proposals. The Appropriate Assessment identified that the proposed development should be undertaken in accordance with the mitigation detailed in within this sHRA. Subject to the proposed development being undertaken in accordance with the mitigation detailed above, including the BNG, the implementation of a sensitive lighting strategy, CEMP and LEMP, these measures are considered sufficient to ensure that the construction and operation of the proposed development does not, either alone or in-combination with other plans or projects, give rise to any adverse effects on the integrity of the Mells Valley SAC or the Bath and Bradford-on-Avon Bats SAC.

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