



**BENGROVE LTD**

Ecology-BNG-Wildlife

# SHADOW HABITATS REGULATIONS ASSESSMENT

# SOUTHVIEW FARM

Client: Coulston Estates

Date Issued: 26 February 2026

Our Ref: B25\_074\_sHRA

# Document Issue Record

| Revision | Author                       | Checked by | Issue Date |
|----------|------------------------------|------------|------------|
| 00       | Matt Davies BSc, MSc, MCIEEM | WH         | 26/02/26   |

# Contents

---

|                              |          |
|------------------------------|----------|
| <b>1. INTRODUCTION</b>       | <b>4</b> |
| 1.1. Purpose of the Document | 4        |
| 1.2. Scope of Assessment     | 4        |

---

|                                    |          |
|------------------------------------|----------|
| <b>2. THE DEVELOPMENT PROPOSAL</b> | <b>6</b> |
| 2.1. Site Description              | 6        |
| 2.2. Development Description       | 6        |

---

|                                         |          |
|-----------------------------------------|----------|
| <b>3. SCREENING OF SITES</b>            | <b>7</b> |
| 3.1. Bath and Bradford on Avon Bats SAC | 7        |
| 3.2. Salisbury Plain                    | 8        |
| 3.3. Screening Assessment               | 9        |

---

|                                                                                |           |
|--------------------------------------------------------------------------------|-----------|
| <b>4. POTENTIAL IMPACTS</b>                                                    | <b>11</b> |
| 4.1. Approach to Impact Assessment                                             | 11        |
| 4.2. Impacts on Potential Roost Features                                       | 11        |
| 4.3. Loss, Damage or Change to Potential Foraging Habitat                      | 13        |
| 4.4. Removal, Fragmentation or Modification of a Potential Commuting Corridor  | 15        |
| 4.5. Artificial Lighting of Potential Roosting, Foraging or Commuting Features | 16        |
| 4.6. Noise and Vibration Disturbing Roosting Bats                              | 17        |
| 4.7. Dust and Fumes Close to Potential Roost Features                          | 18        |
| 4.8. Mortality                                                                 | 18        |
| 4.9. Recreational Pressures                                                    | 18        |

---

|                                          |           |
|------------------------------------------|-----------|
| <b>5. LIKELY SIGNIFICANT EFFECTS</b>     | <b>20</b> |
| 5.1. Effects of the Proposed Development | 20        |
| 5.2. In-combination Effects              | 21        |

---

# 1. INTRODUCTION

## 1.1. Purpose of the Document

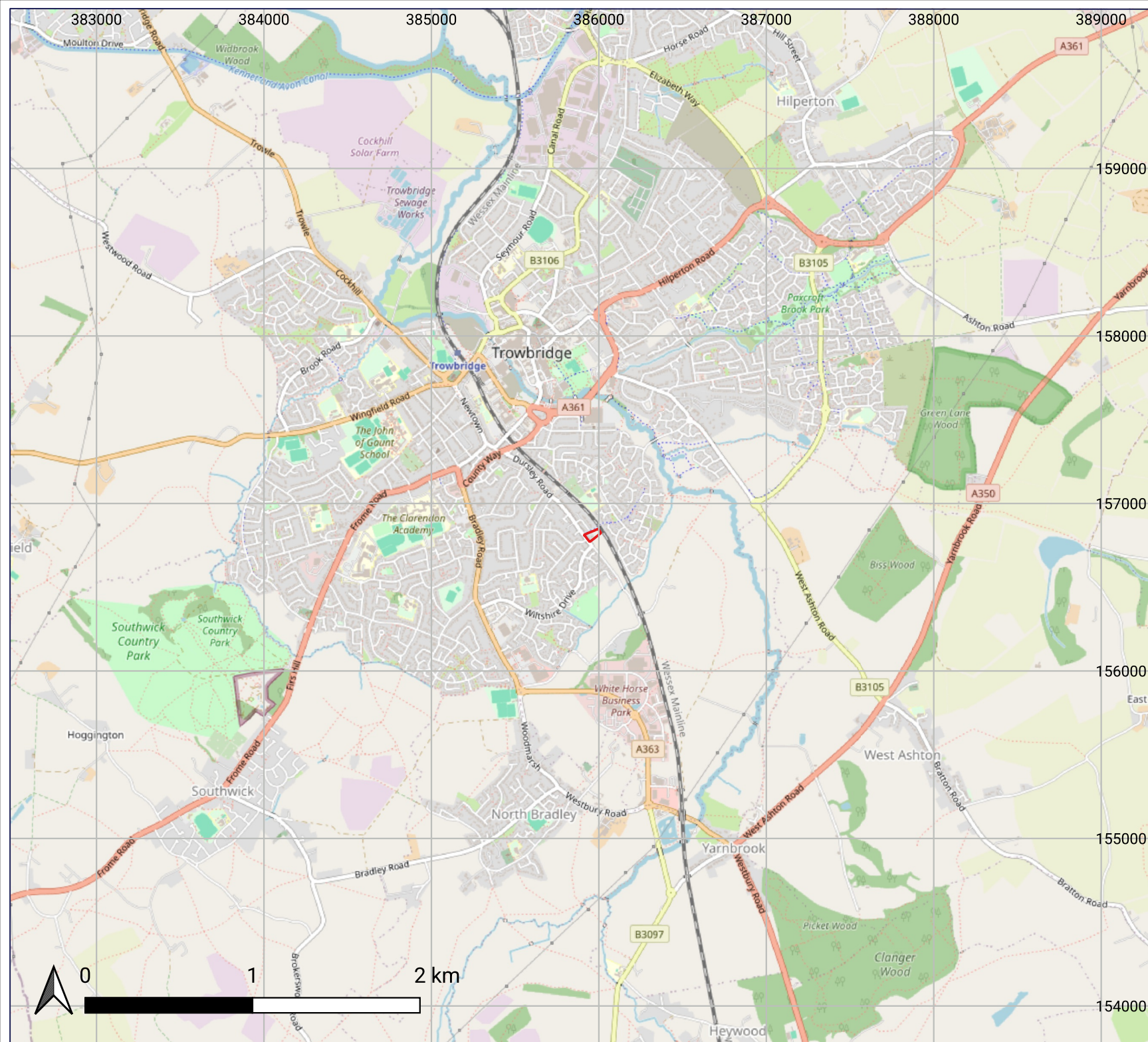
- 1.1.1 Southview Farm comprises an abandoned farmhouse and ancillary land off Drynham Lane, on the edge of Trowbridge. The site is within the land on which planning permission was granted in 2022 for the erection of up to 261 dwellings (the Elm Grove development; planning reference 19/11459/OUT). Planning consent was granted in 2024 for the redevelopment of the farmhouse and ancillary land (planning reference PL/2023/11008). In these previous applications, the impacts of the proposals on bats associated with the Bath and Bradford on Avon Bats SAC was the foremost ecological consideration. The 2022 outline planning permission came with a Landscape and Ecological Parameters Plan that set the spatial priorities for the Southview Farm site, and these parameters were followed in the 2024 consented development.
- 1.1.2 A new planning application has been prepared for development of the site that is similar in scale and extent to the 2024 permission, but with details of the use and layout changed.
- 1.1.3 This report sets out information to assist the competent authority (Wiltshire Council) in conducting an appropriate assessment of the potential for the new proposals to have adverse effects on European designated sites.
- 1.1.4 The competent authority must be *certain* that the development will not result in significant adverse effects on the SAC (e.g. Sweetman v An Bord Pleanála [2014] PTSR 1092). Evidence to support such a conclusion must be capable of *overcoming any reasonable scientific doubt* (e.g. as in Holohan v. An Bord Pleanála ECLI:EU:C:2018:649). However, this does not equate to *absolute certainty* (R (Wyatt) v Fareham BC [2022] EWCA).

## 1.2. Scope of Assessment

- 1.2.1 The potential for the proposed development to impact a European designated site depends on the existence or absence of impact pathways: typically such pathways can include the loss of land that is functionally linked to a site or an increase in recreational pressure at a European site because additional visits to the site would be generated by the development.
- 1.2.2 Land can be considered functionally linked to a European designated site if the lifecycle of a relevant qualifying species would be compromised were that land to become unavailable. More specifically, functional linkage is defined by two criteria: the number of individuals (as a proportion of the qualifying population) that use a site, and the regularity with which they use it. Recreational pressures can occur at some distance from a development site. For example, impacts of residential

development on heathland sites is most intense within 400m of the site, whilst mitigation strategies for recreational pressures on coastal wetlands often extend beyond 10km.

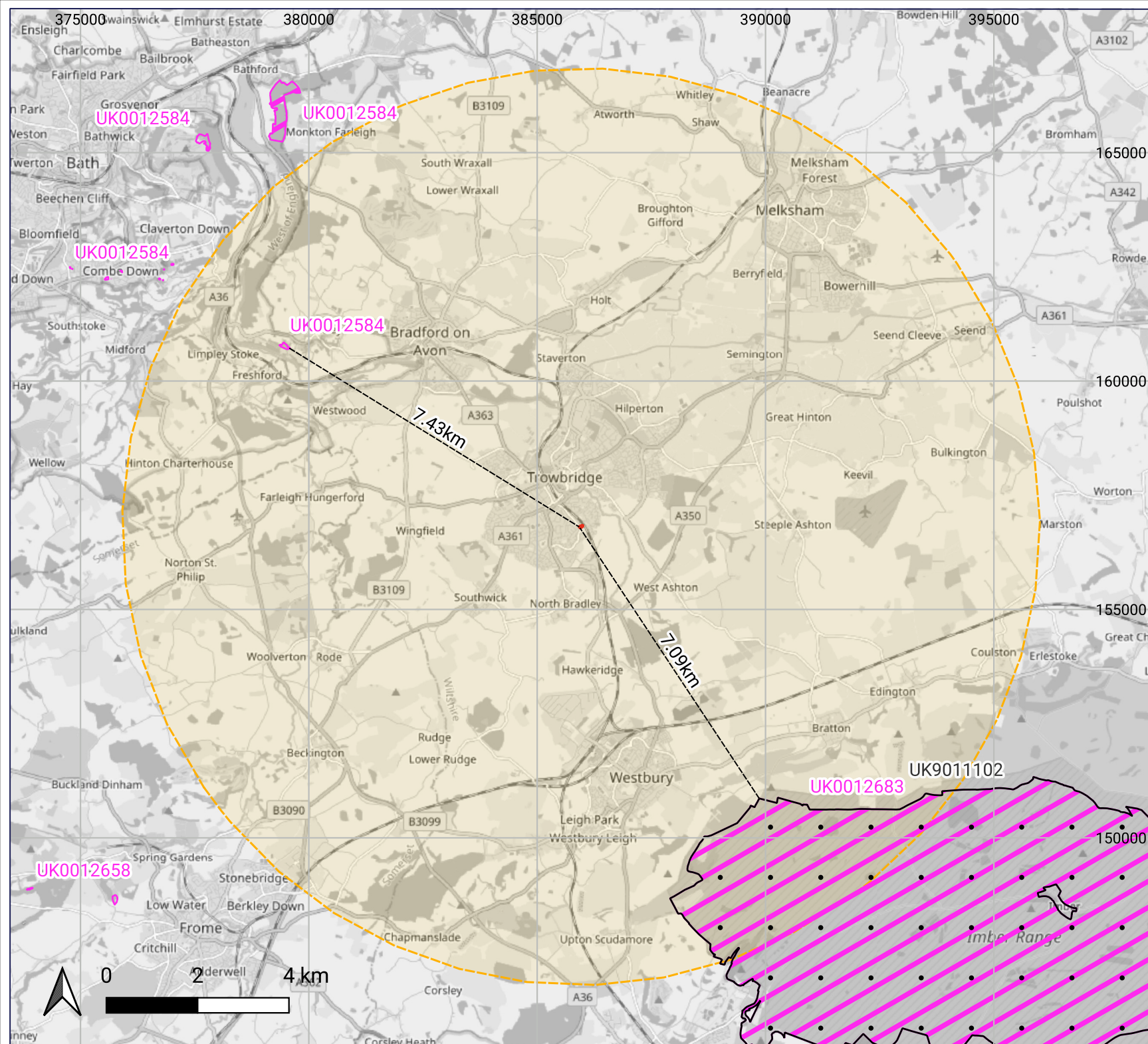
- 1.2.3 There is no fixed distance at which the area of analysis must be set. It need not be so wide as to capture any and all Natura 2000 sites nor all of the land where their qualifying features may be encountered: there is an inverse relationship between the distance from a site and the concentration of qualifying species – a very wide search area would be meaningless.
- 1.2.4 Given the scale of the project and its location and landscape context, a 10km area of analysis has been adopted as sufficiently broad to capture any Natura 2000 sites at risk of impacts. This brings two sites into the assessment: the Bath and Bradford on Avon Bats Special Area of Conservation (SAC); and Salisbury Plain Special Protection Area (SPA) and SAC.
- 1.2.5 An initial screening assessment is presented based on the proposed development without any consideration of avoidance, mitigation or compensation measures that might be provided. This is followed by an assessment of potential impacts on screened-in sites, in which measures to avoid, mitigate or compensate for those potential impacts are set out. The final section considers whether, after the application of any avoidance, mitigation or compensation measures, the project would be likely to have any significant effects on a European designated site, either alone or in combination with other plans and projects.



 Red Line Boundary

OpenStreetMap

|                    |                                |
|--------------------|--------------------------------|
| <b>Project</b>     | Southview Farm Nursery         |
| <b>Client</b>      | Coulston Estates               |
| <b>Title</b>       | Site Location Plan             |
| <b>Date</b>        | 27/02/2026                     |
| <b>Suitability</b> | For issue                      |
| <b>CRS</b>         | OSGB36 / British National Grid |
| <b>Scale</b>       | 1:30000                        |
| <b>QGIS</b>        | 3.44.2-Solothurn               |



- Red Line Boundary
- Special Protection Areas (England) © Natural England
- Special Areas of Conservation (England) © Natural England
- Shortest distance to features
- 10km Zone of Influence

OpenStreetMap

| Sac_code  | Sac_name                     |
|-----------|------------------------------|
| UK0012683 | Salisbury Plain              |
| UK0012658 | Mells Valley                 |
| UK0012584 | Bath & Bradford on Avon Bats |

| Spa_code  | Spa_name        |
|-----------|-----------------|
| UK9011102 | Salisbury Plain |

|             |                                |
|-------------|--------------------------------|
| Project     | Southview Farm Nursery         |
| Client      | Coulston Estates               |
| Title       | European Designated Sites      |
| Date        | 27/02/2026                     |
| Suitability | For issue                      |
| CRS         | OSGB36 / British National Grid |
| Scale       | 1:110000                       |
| QGIS        | 3.44.2-Solothurn               |



## 2. THE DEVELOPMENT PROPOSAL

### 2.1. Site Description

- 2.1.1 The existing site consists of the house and gardens with a driveway; areas of brambles and a parcel of agricultural land to the south and east.
- 2.1.2 The front garden (to the west of the house) once had lawns and flowerbeds, but these are increasingly becoming overgrown with ruderals and brambles. Dense bramble scrub occupies a large part of the northern edge of the site. The gardens are bordered by a stone wall overgrown with Ivy to the front and there are ornamental Leylandii hedges.
- 2.1.3 The field to the south and east of the farmhouse comprises modified grassland that was previously used as pastureland. The grassland is dominated by a mix of Yorkshire Fog (*Holcus lanatus*), Cock's-foot (*Dactylis glomerata*) and Creeping Bent (*Agrostis stolonifera*). Palatable grasses such as Perennial Rye-grass (*Lolium perenne*) would once have been more dominant in the sward but their cover is reduced since the field has become less intensively managed. There are few broad-leaved herbs aside from those typical of low-intensity improved pasture such as Broad-leaved Dock (*Rumex obtusifolius*).
- 2.1.4 The eastern edge of the site backs onto the railway line, which forms a green infrastructure route on a north-south axis through Trowbridge.

### 2.2. Development Description

- 2.2.1 The description of the development is:
- “Demolition of redundant stone barns; erection of children’s nursery with new access, car parking, secure garden and associated landscape and drainage works (Class E); installation of new vehicular access and parking area to retained Southview Farmhouse, erection of replacement rear conservatory, erection of car port, associated erection of boundary treatment, and associated drainage and landscaping.”*
- 2.2.2 The nature of the application (in ecological terms) varies little from the use envisaged at the grant of outline permission or from the proposal that was consented in 2024.

## 3. SCREENING OF SITES

### 3.1. Bath and Bradford on Avon Bats SAC

3.1.1 The SAC is made up of several underground sites including four Sites of Special Scientific Interest (SSSI) – Box Mine, Winsley Mine, Combe Down and Bathampton Mines and Brown's Folly. The qualifying features of the SAC are:

- 1304 Greater horseshoe bat (*Rhinolophus ferrumequinum*)
- 1303 Lesser horseshoe bat (*Rhinolophus hipposideros*)
- 1323 Bechstein's bat (*Myotis bechsteinii*)

3.1.2 **Greater horseshoe bats** are among the rarest species in Britain. Their main foraging habitats (in order of preference) are:

- Cattle-grazed pasture
- Ancient, semi-natural woodland
- Pasture grazed by other livestock (not cattle)

3.1.3 They rely of different types of prey depending on the time of year: in April large dung beetles are important, in May cockchafer become more important, and in the summer breeding period moths are the preferred prey items.

3.1.4 Whilst these are the key preferences of the species, they require a varied and ecologically rich landscape to support them throughout the seasons and will feed in other habitats and prey on species other than those listed above.

3.1.5 Horseshoe bats are light-averse and tend to fly low along well-connected linear features. Their core foraging range from roosts is up to 4km, but they will fly further to reach good foraging habitat.

3.1.6 **Lesser horseshoe bats** are one of the rarer species of bat in Britain. They typically roost in buildings in summer and in caves and mines in winter. They specialise in foraging in cluttered environments such as woodland, scrub and hedgerows, with woodland forming the most important habitat.

3.1.7 Lesser horseshoe bats are light-averse and typically range around 2km from their roosts to forage. Dung flies are a key prey species along with midges, gnats, crane flies and moths.

3.1.8 **Bechstein's bat** is rare in Britain and sparsely distributed, being restricted to southern England. British populations appear to favour mature woodland with a high proportion of oak and ash, with a preference for larger woods. In summer they typically roost and breed in tree cavities, including trees in woods and hedgerows.

3.1.9 They forage in deciduous woodland although they may also forage over open ground and along hedgerows. They travel between 0.5km and 1.5km from roosts to foraging sites on average, although they may range up to 4km. Like most species, Bechstein's bats will favour well-connected, dark linear features for commuting, but radio-tracking studies have also shown them flying across open fields and across well-lit roads

3.1.10 The Conservation Objectives for the SAC are:

*“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.”*

## 3.2. Salisbury Plain

3.2.1 The SAC is designated primarily for its collection of Annex I habitats. The site features the best remaining example in the UK of lowland juniper scrub on chalk heath, as well as the largest surviving semi-natural dry grassland within the EU. The SAC is an orchid rich site and additionally designated for its breeding population of marsh fritillary butterflies, an Annex II species.

3.2.2 The SPA supports important numbers of non-breeding Hen Harrier (*Circus cyaneus*); breeding Eurasian Hobby (*Falco subbuteo*); breeding Common Quail (*Coturnix coturnix*); and breeding Stone Curlew (*Burhinus oedicephalus*).

3.2.3 The Salisbury Plain mitigation strategy, primarily managed by Wiltshire Council and Natural England, aims to protect the Special Protection Area (SPA) and Special Area of Conservation (SAC) from increased recreational pressure due to housing growth. It focuses on managing visitor impacts, monitoring protected species like the Stone-curlew, and utilizing developer contributions for green infrastructure. In March 2025 Natural England confirmed that the mitigation strategy continues to receive their endorsement.

3.2.4 Key components of the mitigation strategy include:

- **Recreational Buffer Zones:** a 6.4km zone around the Salisbury Plain SPA
- **Developer Contributions:** New residential developments within the zone of influence are required to contribute to mitigating recreational impacts

- Targeted Monitoring: Ongoing monitoring of visitor numbers and protected species, particularly the Stone-curlew, to assess the effectiveness of the strategy.
- Strategic Management: Implementation of measures such as improved signage, path management, and habitat restoration to manage access and protect sensitive habitats

### 3.3. Screening Assessment

#### **Bath and Bradford on Avon Bats SAC**

- 3.3.1 The proposed development site is partly within the Yellow Zone of the Trowbridge and Westbury Bat Mitigation Strategy (TWBMS). The Yellow Zone comprises a 1.5km buffer around Core Roosts of Bechstein's bats; a 4km buffer around Core Roosts of greater horseshoe bats; a 2km buffer around Core Roosts of lesser horseshoe bats (which together make up the Core Areas) and key commuting corridors that link up the Core Areas. The River Biss and the railway line through Trowbridge are a key commuting corridor.
- 3.3.2 The site is also within the Grey Hatched Zone of the TWBMS, which is the area within which new residential development is likely to result in increased recreational use of woodland bat sites. The TWBMS sets out a list of information that should accompany a planning application relevant to these areas:
- Bat Surveys
  - A Statutory Biodiversity Metric
  - An Ecological Mitigation Plan
  - A lighting impact assessment, including Lux contour plots
  - A Construction Ecological Management Plan (CEMP) although this may be deferred to condition if the requirements are straightforward
  - A Landscape and Ecological Management Plan (LEMP) – this may also be deferred if the requirements are straightforward
- 3.3.3 The TWBMS also sets out the expectations for on-site and off-site mitigation. On the basis that the site is within the zones identified in the TWBMS as sensitive to development, and that the additional information listed above is considered necessary to determine its impacts, the site is screened-in for further assessment.

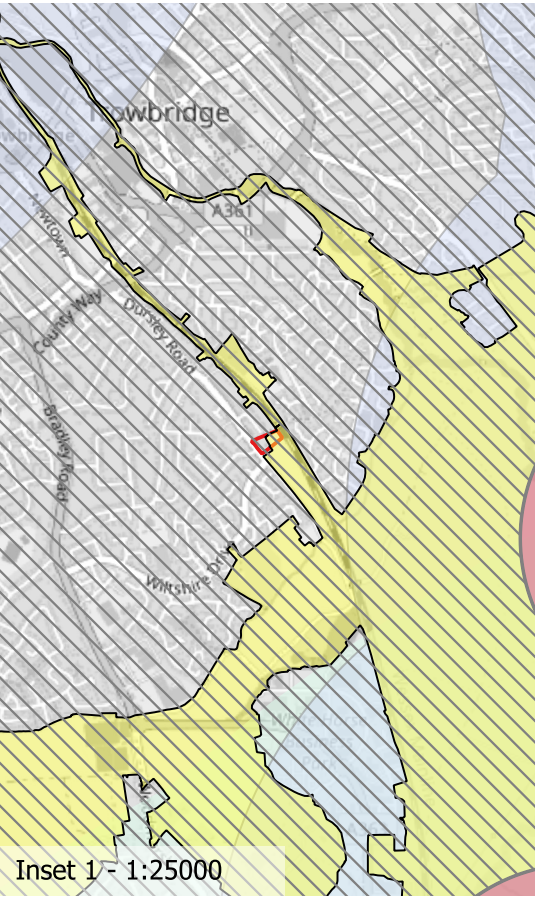
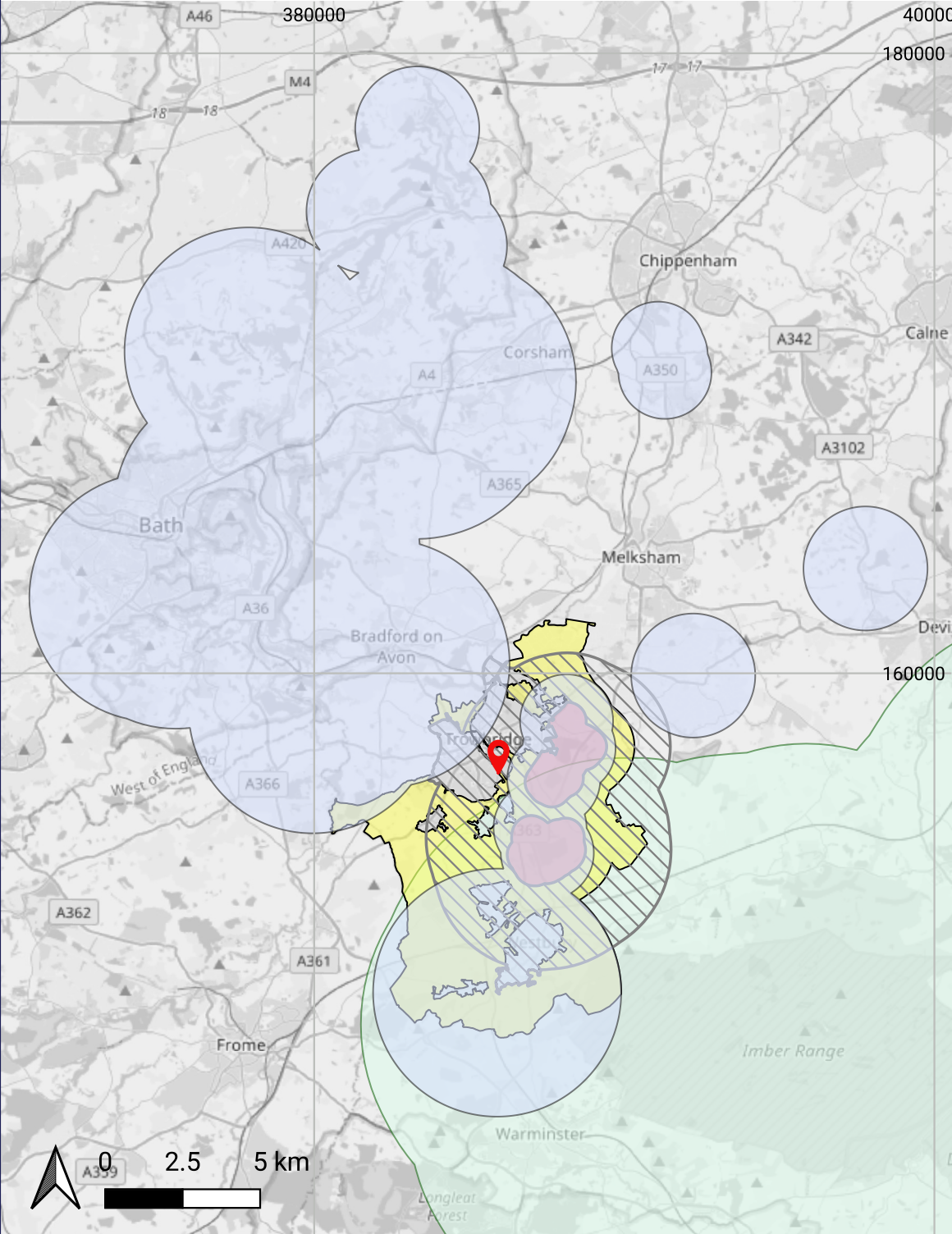
Wiltshire Council Biodiversity Mitigation Layers

Site Location Within Yellow Zone

- Site Location
- Red Line Boundary
- Impact Zones For Bat Species
- Grey Hatched Zone
- Red Zone
- Yellow Zone
- Salisbury Plain SPA Mitigation Zone

OpenStreetMap

|             |                                |
|-------------|--------------------------------|
| Project     | Southview Farm Nursery         |
| Client      | Coulston Estates               |
| Title       | Biodiversity Mitigation Layers |
| Date        | 27/02/2026                     |
| Suitability | For issue                      |
| CRS         | OSGB36 / British National Grid |
| Scale       | 1:200000                       |
| QGIS        | 3.44.2-Solothurn               |



### **Salisbury Plain SAC & SPA**

- 3.3.4 The site's habitats are not suitable for any of the bird species for which the SPA is designated (**Table 4-1**). The site would not therefore be used by these species, and alteration of the site's habitats would not have any effect on land that is functionally linked to the SPA.

**Table 4-1: habitat preferences of SPA qualifying species**

| Qualifying Species          | Habitat Preferences                                                                                                                                                                                                                                                                                                                        |
|-----------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Non-breeding<br>Hen Harrier | Hen harriers depend heavily on open habitats during winter. These include open grasslands with abundant small mammals such as common voles, which are their primary winter prey in Central Europe and lowland areas around estuaries and other open spaces with low vegetation, which provide suitable foraging conditions.                |
| Breeding<br>Eurasian Hobby  | Hobbies prefer open landscapes, which allow the fast, agile flight they use to pursue prey. Key habitats include farmland, and marshes especially where flying insects and small birds are abundant.                                                                                                                                       |
| Breeding<br>Common Quail    | Common Quail in the UK depend mainly on farmland and grassland habitats. They spend most of their time hidden on the ground within grass or cereal fields, using dense vegetation for cover. They prefer cereal crops and tall grasslands, which provide both security from predators and suitable microclimates for nesting and foraging. |
| Breeding Stone<br>Curlew    | Stone curlews require dry, open habitats with very sparse vegetation, typically sandy heaths and well-grazed grasslands, and arable fields on light, stony or sandy soils                                                                                                                                                                  |

- 3.3.5 The site is approximately 7.1 km away from the Salisbury Plain SAC and SPA. The development site does not contain any of the habitats for which the SAC is designated, and at this distance there are no potential impact pathways that would lead to any effects on the SAC.
- 3.3.6 The site is outside of the 6.4km zone of influence for recreational impacts that was identified in the strategic mitigation plan. Furthermore, the development does not propose to introduce any new residential dwellings.
- 3.3.7 It can be concluded, with due regard to the precautionary principle, that even in the absence of any avoidance, mitigation or compensation measures, there would be no likely significant effects on Salisbury Plain SAC, SPA or Ramsar. This site is therefore screened out of further assessment.

## 4. POTENTIAL IMPACTS

### 4.1. Approach to Impact Assessment

- 4.1.1 The project design has evolved over several iterations and collaboration between the relevant specialists on the project team including landscape design, architectural, lighting and ecology. This has resulted in a proposal that includes measures to avoid and mitigate potential adverse impacts on bats associated with the SAC.
- 4.1.2 This following sections out the potential impacts of the proposed development and describes any measures that have been included in the project to address them.

### 4.2. Impacts on Potential Roost Features

- 4.2.1 There is one tree on site that has potential bat roosting features – a mature Willow adjacent to the farmhouse. The trunk of the tree is split and there is a large cavity inside. Emergence surveys were carried out on the tree in 2023 and no bats were roosting in the tree at that time. The cavity was inspected with an endoscope in 2025 and there was no evidence of bats roosting in the tree.
- 4.2.2 The farmhouse is a two-storey building with a hipped roof covered with slates. The brickwork walls are rendered and the windows are all fully boarded up and sealed. There are some small crevice-gaps under slipped roof tiles and small gaps in the wooden soffit boxes. The long barn on the northern edge of the site is a single-storey building that had clay tiles on a timber roof, but it is almost completely collapsed and has no bat roosting potential.
- 4.2.3 During the three emergence surveys of the farmhouse in 2016, a small number of Common Pipistrelles emerged from one corner of the building in May but no bats emerged or re-entered on the following two surveys. It was concluded that the building was used as a transient roost by small numbers of probably male bats. A single Common Pipistrelle emerged from the same point on the building on one of the surveys in 2016, but again was absent from the other two surveys.
- 4.2.4 On the first emergence survey in 2025, the only bats recorded were Common Pipistrelles and Noctules. The first observation of a Pipistrelle was at around 25 minutes after sunset, suggesting it emerged from a roost nearby, but it did not emerge from the farmhouse. Bat activity was in general quite limited, with only six observations of bats across the survey. On the second survey, no bats were recorded at all. On the third survey, at the end of August, only four observations were recorded: a Soprano Pipistrelle flew through the site at around 6 minutes after sunset, two Common Pipistrelles flew through the site and one Brown Long-eared bat flew past the site.

- 4.2.5 The combined survey data indicates that the farmhouse is occasionally used by small numbers of probably male Common Pipistrelles as a transitional roost before or after the maternity season. Although the surveys in 2025 did not confirm the emergence of bats from the building, it is assumed for the purposes of this report that the building is still used as a roost.
- 4.2.6 The farmhouse does not have any access points into which horseshoe bats could fly and Bechstein's bats prefer to roost in trees rather than buildings. The dilapidated barn is not a suitable roosting site. The renovation of the farmhouse and demolition of the barn would not therefore result in the loss of any *potential* roosting features.
- 4.2.7 The mature willow tree in the approximate centre of the site will be removed as part of the proposed development. Whilst this is not currently used as a bat roost, if the site continues to be unused and increasingly overgrown, it could be used as a roost by Bechstein's bats at some point in the future. The development will therefore result in the loss of one *potential* roosting feature for Bechstein's bats. As the site is not used for roosting by any of the three qualifying species, there will be no loss of *actual* roosting features.
- 4.2.8 The loss of the potential roosting feature in the mature willow tree will be compensated by providing alternative roosting sites.
- 4.2.9 Bechstein's bats will use bat boxes made from cement and sawdust, and radio-tracking studies of the local population have shown that they occupy several roost sites and forage in even quite small woodland areas. Two approaches will be taken to give the best possible chance of providing a roost site suitable for Bechstein's bat:
- As there are no suitable mature trees in a dark area of the site, a pole-mounted bat box will be installed in the newly planted woodland. It is unlikely this would be used to begin with, as the newly planted trees and shrubs will not provide sufficient dark cover until they reach a more mature height after around 3-5 years.
  - A bat box will also be mounted onto the gable end of the new nursery building, which faces onto the dark corridor along the railway.
- 4.2.10 It may take some time before either of these boxes becomes occupied by bats, however as the strategy is to replace a potential roost rather than an actual roost this is considered acceptable.
- 4.2.11 To ensure no bats are harmed during construction, the willow tree will be re-inspected prior to the start of construction on site. This will be set out in a Construction Ecological Management Plan (CEMP).
-

## 4.3. Loss, Damage or Change to Potential Foraging Habitat

- 4.3.1 It was established during the surveys for the outline planning application that low numbers of greater and lesser horseshoe bats were using boundary hedges of the Elm Grove site as commuting habitat (generally one or two passes per night were recorded) but they did not appear to be using the open fields. It was noted at the time of this application that, whilst the railway corridor provides a continuous green link through the town, the section alongside the Elm Grove site lacks structural features such as hedges or scrub and there is room to enhance it with new planting.
- 4.3.2 The grassland and gardens within the Southview Farm site are not key foraging habitat types for horseshoe bats or Bechstein's bats. Radio-tracking studies on Bechstein's bats roosting at Picket & Clanger Woods have shown them foraging amongst a variety of habitats but the closest area identified as a foraging site was around 600m to the south of Southview Farm (known as 'Willowy Copse'). Surveys of the site have not shown it to be used regularly by significant numbers of bats and very little activity was recorded during the most recent bat emergence surveys in 2025. The site is not within a Core Area.
- 4.3.3 In the absence of any avoidance, mitigation or compensation, the proposed development would remove a small area of habitat of low foraging quality that is not regularly used by significant numbers of bats. As it is impossible to categorically rule out the presence of any bat species from a site without near continuous monitoring, there remains a very small degree of uncertainty as to whether the qualifying species ever use the site, if only occasionally in non-significant numbers. The project therefore includes a strategy to provide suitable bat foraging habitat in a dark area of the site.
- 4.3.4 The landscape proposals include the provision of an area of woodland with associated species-rich grassland on the eastern edge, adjacent to the railway corridor. Of the habitats that will be removed for the development, the bramble scrub along the northern edge is perhaps the best potential bat foraging habitat. The effect of losing this habitat will be compensated by the provision of the new woodland: the net balance of gains and losses in relation to bat foraging habitats are illustrated in the Table below and on the plans overleaf.
- 4.3.5 The creation and management of the proposed woodland is set out in the Landscape Plan, Planting Schedule and a Habitat Management and Monitoring Plan (HMMP).
- 4.3.6 The trees and shrubs for the new woodland will be planted in naturalistic non-linear patterns. Details of stock selection, ground preparation, planting density, timing, planting methodology, weed control, plant protection and long-term maintenance are set out in the HMMP. The woodland will be better suited to Bechstein's bats and Lesser Horseshoe Bats as it will have a closed canopy with

dense understorey, as opposed to Greater Horseshoe Bats that prefer open shaded areas in woodland and woodland edges. It has been designed to have a graded edge with transition into species-rich grassland to provide sheltered areas rich in invertebrate prey. The woodland will not be generally accessible: it is enclosed by a 2.1m high wooden fence and only accessed through a gate. It will not therefore be accessible for recreational use but the gate provides access for maintenance and monitoring.

**Table 5-1: changes in habitats as a result of the proposed development**

|                                               | Habitat               | Lost                | Retained          | Created             | Net Change                 |
|-----------------------------------------------|-----------------------|---------------------|-------------------|---------------------|----------------------------|
| Order of Preference for Foraging Habitat<br>↓ | Woodland              | -                   | -                 | -                   | <b>+222m<sup>2</sup></b>   |
|                                               | Wildflower meadow     | -                   | -                 | 153m <sup>2</sup>   | <b>+153m<sup>2</sup></b>   |
|                                               | Modified grassland    | 837m <sup>2</sup>   | 304m <sup>2</sup> | 22m <sup>2</sup>    | <b>-511m<sup>2</sup></b>   |
|                                               | Bramble scrub         | 413m <sup>2</sup>   | -                 | -                   | <b>-413m<sup>2</sup></b>   |
|                                               | Ruderal vegetation    | 299m <sup>2</sup>   | -                 | -                   | <b>-299m<sup>2</sup></b>   |
|                                               | Trees                 | 4 trees             | 3 trees           | 10 trees            | <b>+9 trees</b>            |
|                                               | Garden                | 1,062m <sup>2</sup> | 193m <sup>2</sup> | 376m <sup>2</sup>   | <b>-493m<sup>2</sup></b>   |
|                                               | Ground-level planters | -                   | -                 | 18m <sup>2</sup>    | <b>+18m<sup>2</sup></b>    |
|                                               | Un-vegetated ground   | 265m <sup>2</sup>   | 151m <sup>2</sup> | 2,226m <sup>2</sup> | <b>+2,112m<sup>2</sup></b> |



-  Red Line Boundary
-  Existing Large Urban Tree
-  Existing Medium Urban Tree
-  Existing Small Urban Tree
-  Non-native and ornamental hedgerow
-  Bramble scrub
-  Developed land; sealed surface
-  Modified grassland
-  Ruderal/Ephemeral
-  Vegetated garden

Google Satellite

|                    |                                |
|--------------------|--------------------------------|
| <b>Project</b>     | Southview Farm, Trowbridge     |
| <b>Client</b>      | Coulston Estates               |
| <b>Title</b>       | Baseline Habitats (BNG)        |
| <b>Date</b>        | 27/02/2026                     |
| <b>Suitability</b> | For issue                      |
| <b>CRS</b>         | OSGB36 / British National Grid |
| <b>Scale</b>       | 1:500                          |
| <b>QGIS</b>        | 3.44.2-Solothurn               |



- Red Line Boundary
- Proposed Small Urban Tree
- Retained Small Urban Tree
- Lost Tree
- Species-rich native hedgerow
- Artificial unvegetated, unsealed surface
- Developed land; sealed surface
- Ground level planters
- Lowland mixed deciduous woodland
- Modified grassland
- Other neutral grassland
- Vegetated garden

#### Proposed Parcel Labels

- W1
- U4
- U3
- U2
- U1
- G2
- G1

#### Google Satellite

|             |                                |
|-------------|--------------------------------|
| Project     | Southview Farm, Trowbridge     |
| Client      | Coulston Estates               |
| Title       | Proposed Habitat Parcels (BNG) |
| Date        | 27/02/2026                     |
| Suitability | For issue                      |
| CRS         | OSGB36 / British National Grid |
| Scale       | 1:500                          |
| QGIS        | 3.44.2-Solothurn               |

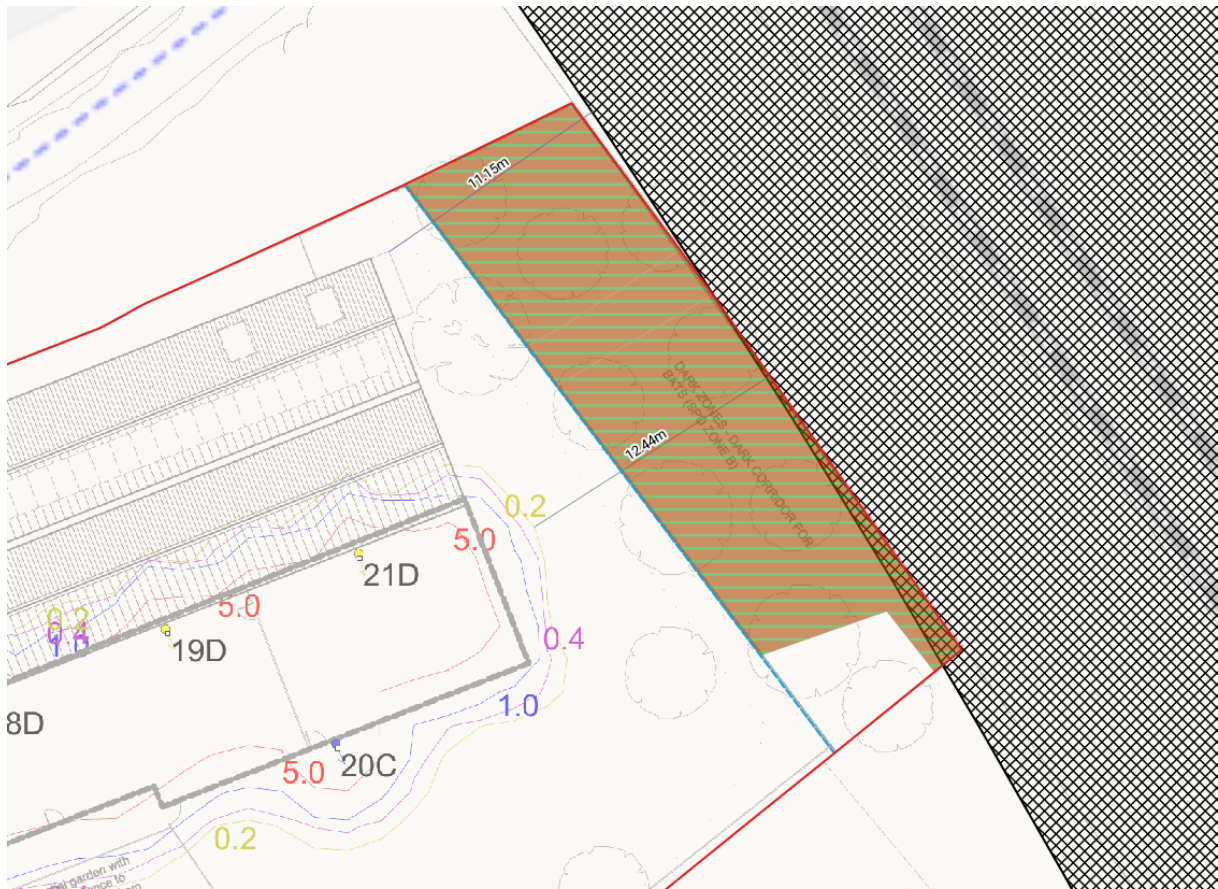


## 4.4. Removal, Fragmentation or Modification of a Potential Commuting Corridor

- 4.4.1 The development's red line boundary is outside of the 30m dark corridor illustrated in the approved Landscape and Ecological Parameters Plan. It would not therefore remove or fragment the existing corridor through any physical intervention.

## 4.5. Artificial Lighting of Potential Roosting, Foraging or Commuting Features

- 4.5.1 As there would be no potential roosting features within the completed development there would be no risk that such features would be adversely affected by artificial lighting.
- 4.5.2 The light-sensitive bats for which the SAC is designated are able to cross brightly lit roads and it is not likely that there would be sufficient light spill to render the railway corridor entirely unsuitable as a commuting route, however, in the absence of any avoidance, mitigation or compensation, it is possible that light spill from the new nursery would fall onto the 30m dark corridor and bats;’ behaviour might be altered and it is possible that they would be deterred from using any areas lit above 0.2 Lux.
- 4.5.3 An Outdoor Lighting Report has been prepared for this project by Designs for Lighting (DFL Project Number 3420-DFL-ELG-XX-LD-EO-13002; dated 9<sup>th</sup> February 2026). DFL have also prepared a lighting strategy for the development (Document Ref: 3420-DFL-ELG-XX-RP-EO-13001 dated 10<sup>th</sup> February 2026). These reports were prepared after liaison amongst the design team during which the constraints relating to bats were discussed. The design team largely comprised the same professionals that worked on the already consented development proposals, and the objective was to ensure that the outcome was the same as or better than the consented development.
- 4.5.4 The closest part of the development to the dark corridor now consists of an un-glazed gable end wall with no vehicle turning area. The lighting strategy sets the following design parameters:
- Luminaires will be integral LEDs with known photometry
  - The colour temperature will be warm white (3,000 Kelvin or lower)
  - The car park will be lit to 5 Lux
  - Play areas will be lit to 7.5-10 Lux
  - Footpaths separate from the nursery will have only wayfinding lighting using bollards with down-lighters
  - Upward light spill will be 0% and Glare Class will be not less than G3
  - Lighting columns will not exceed 6m in height
- 4.5.5 The development is set back by 11m at its closest point to the 30m buffer zone that was set out in the Landscape and Ecological Parameters Plan and includes a stand of newly-planted woodland that will provide additional protection for the dark corridor against light spill. The woodland is enclosed on the development side by a 2.1m tall wooden fence: this creates an absolute barrier to light spill, in addition to the benefits of the tree planting.



**Figure 1: On-site measures to protect the 30m dark corridor**

## 4.6. Noise and Vibration Disturbing Roosting Bats

- 4.6.1 There are no potential roosting features that are used by the SAC bat species. The construction of the proposed development would not have any impact on roost features used by the SAC species (or any other bats) and would not therefore give rise to any adverse effects on the SAC.

## 4.7. Dust and Fumes Close to Potential Roost Features

- 4.7.1 There are no potential roosting features that are used by the SAC bat species. It can be concluded with a suitable degree of certainty that the construction of the proposed development would not have any impact on roost features used by the SAC species (or any other bats) and would not therefore give rise to any adverse effects on the SAC.

## 4.8. Mortality

- 4.8.1 As there are no roosts on the site there is no risk that domestic cats or any other pets would predate upon bats in a roost or at a roost entrance.
- 4.8.2 Vehicles entering and leaving the site would necessarily be travelling short distances at slow speeds. The developed part of the site through which vehicles would be moving would not be attractive to the SAC species, as light levels may be higher, and it would not have suitable foraging habitat. The likelihood of mortality from road collisions is therefore negligible.

## 4.9. Recreational Pressures

- 4.9.1 The TWBMS sets out how new residential development could lead to increased public use of key bat sites and how this may lead to adverse effects on the SAC.
- 4.9.2 The Southview Farm proposal does not include any new residential development, in which case it may be outside the scope of projects that the TWBMS anticipates would have an impact on key bat sites. Paragraph 51 on Page 19 of the TWBMS states:

*"...depending on the nature of the scheme, the potential for commercial, employment and other non-residential developments to result in additional recreational pressure on the important woodland sites to the east and south-east of Trowbridge are expected to be less significant"*

- 4.9.3 The nursery element of the Southview Farm proposal would appear logically to fall outside the scope of projects likely to lead to recreational pressures: nursery users and staff will most likely be on-site for the majority of the time. Should the nursery elect to take children to one of the key woodland bat sites, this would be a trip supervised by adults in which the kind of damaging activities that the TWBMS is designed to address would not occur.

- 4.9.4 The residential element of the proposals involves the renovation of an existing dwelling. The farmhouse has been unoccupied for around 10 years, so it may be viewed that renovation of the property will re-introduced residential occupancy, but the re-occupation of one dwelling seems very likely to fall outside the scope of the projects considered in the TWBMS in relation to recreational pressure.

Recommended Bat Boxes

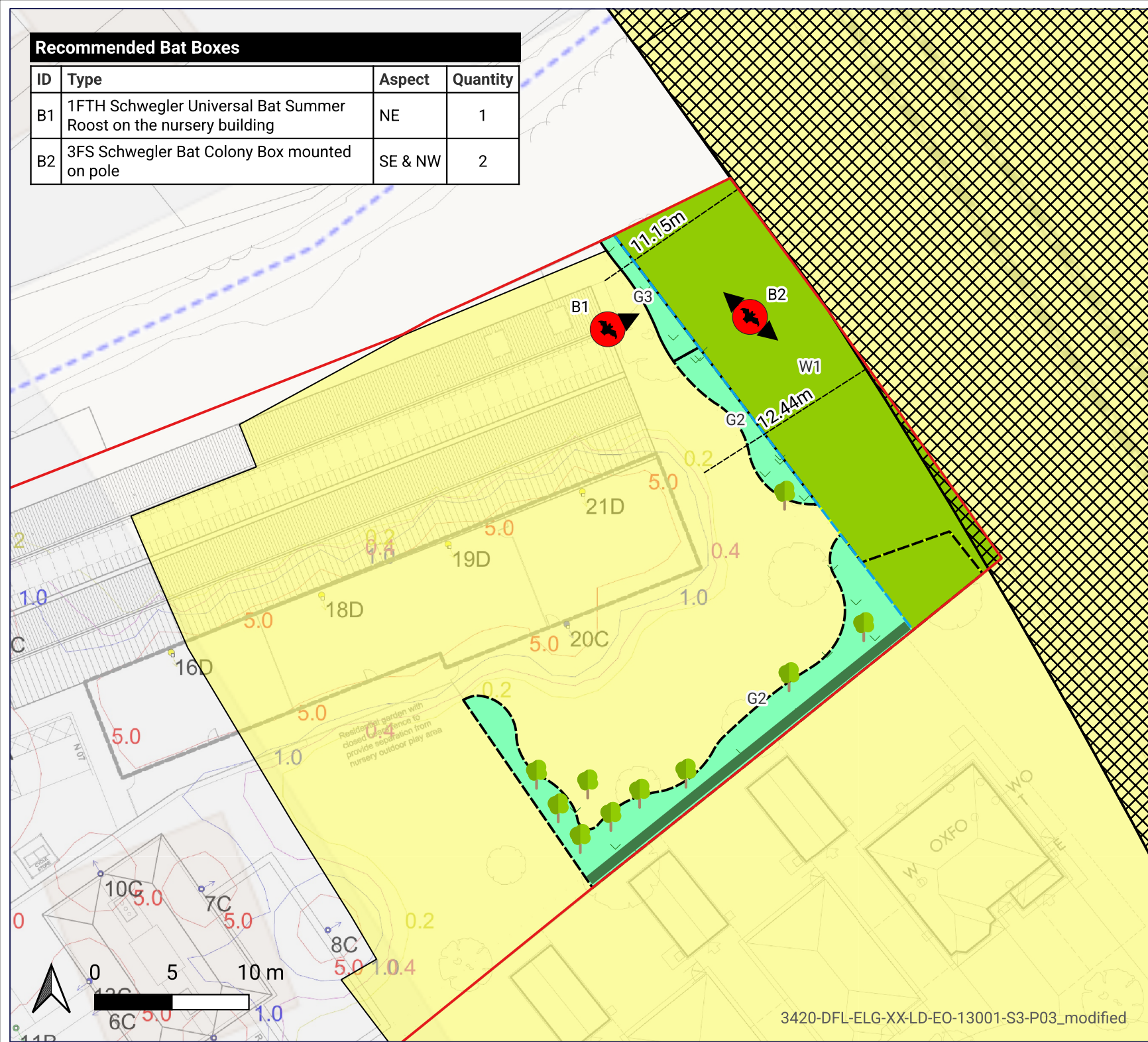
| ID | Type                                                              | Aspect  | Quantity |
|----|-------------------------------------------------------------------|---------|----------|
| B1 | 1FTH Schwegler Universal Bat Summer Roost on the nursery building | NE      | 1        |
| B2 | 3FS Schwegler Bat Colony Box mounted on pole                      | SE & NW | 2        |

- Trees
- Species-rich hedge
- Fence
- Shortest distance between features
- Grassland
- Woodland
- TWBMS Yellow Zone
- Red Line Boundary
- Dark Zone Buffer

OpenStreetMap

| ID | Area (m2) | Habitat   |
|----|-----------|-----------|
| W1 | 221.489   | Woodland  |
| G2 | 140.528   | Grassland |
| G1 | 33.221    | Grassland |
| G3 | 11.548    | Grassland |

|             |                                |
|-------------|--------------------------------|
| Project     | Southview Farm Nursery         |
| Client      | Coulston Estates               |
| Title       | Ecological Mitigation Plan     |
| Date        | 27/02/2026                     |
| Suitability | For issue                      |
| CRS         | OSGB36 / British National Grid |
| Scale       | 1:325                          |
| QGIS        | 3.44.2-Solothurn               |



## 5. LIKELY SIGNIFICANT EFFECTS

### 5.1. Effects of the Proposed Development

- 5.1.1 After the application of the avoidance, mitigation and compensation measures, the net impact of the proposed development on qualifying species of the SAC are:
- The removal of one *potential* unused roosting feature (the willow tree) and the provision of two new *potential* roosting features (pole-mounted and building-mounted bat boxes i.e. a net increase in the amount of potential roosting habitat.
  - An overall reduction in habitat units of low quality for foraging bats, offset by an increase in the amount of accessible foraging habitat designed and managed specifically for Bechstein's bats and Lesser Horseshoe bats.
  - Protection of the key commuting corridor against light spill through design, layout, fencing and planting to ensure there will be no light spill onto the 30m corridor established as a parameter of the original outline planning consent
  - Enhancement of the existing key commuting corridor along the railway line by providing new woodland planting (where there is currently only a fence line)
- 5.1.2 These measures are supported by the evidence required by the TWBMS i.e. bat surveys; a Statutory Biodiversity Metric; an Ecological Mitigation Plan; and a lighting impact assessment, including Lux contour plots.
- 5.1.3 The construction stage avoidance measure (a pre-start inspection of the willow tree) is a straightforward matter that can be included in a CEMP provided as a condition of any planning permission. An outline HMMP has been provided with this application, and a planning condition can be imposed to ensure provision of an up-to-date management plan prior to commencement.
- 5.1.4 After the avoidance, mitigation and compensation measures set out above have been applied, it can be concluded that the project would not, on its own, be likely to lead to a significant adverse impact on the SAC.

## 5.2. In-combination Effects

5.2.1 Paragraph 218 of the TWBMS states that

*“When assessing the impact of a single development, it may be reasonable to assume that loss of small quantities of poor-quality habitat will not result in an impact on the SAC when considered alone. However, such impacts considered at the landscape scale i.e. ‘in-combination’ with other developments may add up to a more significant impact due to cumulative loss of foraging habitat and connectivity for bats.”*

5.2.2 The TWBMS therefore sets out a strategic approach to mitigation that will be funded by developer contributions. The strategic habitat mitigation is to be charged at £972.03 per dwelling, which will be payable through s106, s111 or unilateral undertaking.

5.2.3 The potential cumulative effect of recreational pressure for projects of fewer than 50 dwellings is also addressed in the TWBMS via developer contributions, calculated at £925 per dwelling, which will be payable through s106, s111 or unilateral undertaking.

5.2.4 The landowners of the Southview Farm project also own farmland within the Bat Habitat Improvement Zone shown on Figure 7 in the TWBMS. Mitigation could be secured through this route via planning condition or suitable legal agreement.

5.2.5 Subject to the application of the strategic measures set out in the TWBMS, there would be no adverse effect on the SAC in combination with other plans or projects.



# **BENGROVE LTD**

**Ecology-BNG-Wildlife**

tel. 01225 234946

[enquiries@bengroveconsult.co.uk](mailto:enquiries@bengroveconsult.co.uk)

Bengrove Ltd | 86-90 Paul Street  
London | EC2A 4NE

[bengroveconsult.co.uk](http://bengroveconsult.co.uk)