

Council Planning Consultation Response

ECOLOGY

Officer name:	Elizabeth Burrows, Senior Ecologist
Date:	14/05/2026
Application No:	PL/2026/01506
Proposal:	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 park, associated erection of boundary treatment, and associated drainage and landscaping.
Site Address:	Southview Farm, Drynham Road, Trowbridge, BA14 0PJ
Case Officer:	Jemma Foster

Recommendations:

☐	No Comment
☐	Support
☐	No objection
☒	Condition (no objection subject to conditions)
☐	Objection - further information required
☐	Objection in principle
☒	HRA.

Appropriate Assessment with a positive conclusion has been sent to Natural England, who must agree the conclusion (within 21 days) prior to this application being permitted.

Thank you for your consultation on the above application. I have reviewed the submitted documents against OS maps, aerial photographs of the site and surrounding area, together with GIS layers of statutory and non-statutory designated sites and existing records of protected species.

Information considered:

- Ecological Impact Assessment. Southview Farm. Ref: B25_074_EcIA. (Bengrove Ltd, 2/02/2026)
- Shadow Habitats Regulations Assessment. Southview Farm. Ref: B25_074_sHRA. (Bengrove Ltd, 26/02/2026).
- Landscape Plan. Drawing No. 259_GLA_XX_XX_DR_L_1001 Rev P2. (Greenhalgh, 09/01/2026).
- Proposed Site Plan. (Mitchell Eley Gould, October 2025).
- Southview Farm Lighting Strategy V2.3. (DFL, March 2024).
- Baseline Habitat (BNG) plan (Bengrove, 27/02/2026).
- Proposed Habitat Parcels (BNG) plan (Bengrove, 27/02/2026).

COMMENTS:

Habitats Regulation Assessment (HRA) – Bath and Bradford on Avon Bat SAC

The application site is within multiple a consultation zones for bats associated with the Bath & Bradford on Avon Bats Special Area of Conservation (SAC) (TWBMS Grey Hatched Zone Medium risk for increased recreational impacts and TWBMS Yellow Zone Medium risk for habitat loss) and therefore has potential to result in significant adverse impact on the special features of that site. Appropriate Assessment (AA) under Section 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) must be carried out by the relevant Competent Authority (the LPA) to determine the potential significant effects and the suitability of any measures proposed to avoid or mitigate those effects.

As detailed in the Appropriate Assessment below sufficient information has been submitted to enable the AA to be concluded positively.

Draft Appropriate Assessment

PART A: INFORMATION REVIEWED	
Information about the plan or project	Planning application PL/2026/01506 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 park, associated erection of boundary treatment, and associated drainage and landscaping. Address: Southview Farm, Drynham Road, Trowbridge, BA14 0PJ The Site benefits from the following planning permissions: 19/11459/OUT- Erection of up to 261 dwellings following the demolition of Elm Grove Farmhouse; erection of multi-use community facility (Class F.2); strategic landscaping; access and drainage works; and demolition redundant former agricultural outbuildings - PL/2023/11008 - Demolition of redundant stone barns; Conversion and extension of farmhouse to form co-working hub and children's nursery at ground floor (Class E) and conversion of first floor to a single residential apartment (Class C3); Erection of convenience store (Class E); and associated access and landscaping works (Amended Design) The Site is reported to comprise habitat and features of low nature conservation value including an abandoned farmhouse and gardens, fields of species-poor modified grassland and scrub. The site is located in the TWBMS yellow and grey zones and lies adjacent to a vegetated railway corridor that is part of an ecological network due to its recognised function as a wildlife corridor used by bats for which the Bath and Bradford on Avon Bat SAC is designated
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 grey zone and partially within the yellow and 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;

	• <i>The structure and function of the habitats of qualifying species;</i> • <i>The supporting processes on which the habitats of qualifying species rely</i> • <i>The populations of qualifying species; and</i> • <i>The distribution of qualifying species within the site.”</i> 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, projects or policies.	• Wiltshire Core Strategy adopted January 2015 • Trowbridge & Westbury Bat Mitigation Strategy (adopted 2025) • Bat Special Areas of Conservation (SAC) Planning Guidance for Wiltshire (September 2015).

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 of the TWBMS	A UKHab survey undertaken in 2025 confirms that the house and garden remain abandoned and that the surrounding fields are subject to reduced management. Whilst the extent of scrub is likely to have increased it is agreed that the habitats within the Site remain broadly unchanged. Bat activity surveys have not been updated, and the submitted Ecological Impact Assessment (EclA) relies on desk-based and field data from 2015 and 2016. No robust justification has been provided for the failure to update this baseline, and the reliance on data approaching ten years in age is not considered adequate to confirm the current status of SAC bats. Previous surveys identified low levels of activity by greater and lesser horseshoe bats, with boundary hedgerows used as commuting habitat. In the absence of up-to-date survey data, it must be assumed that SAC bats use the fields at low levels.

	- Confirming the location of core bats habitat (commuting and foraging). - Confirming the status of roosts.	The adjacent railway line and its vegetated embankments are recognised as core bat habitat and form a key commuting corridor through Trowbridge. Emergence surveys undertaken in 2025 confirm that SAC bats are not roosting within the farmhouse. In addition, surveys indicate that bats are not currently roosting in the willow adjacent to the farmhouse.
2	Masterplan to be provided which covers entire allocation (referenced in WHSAP housing policies).	For ecological context and to provide background an image of the Parameter Plan, Landscape and Ecology approved with 19/11459/OUT is provided below.  While this is a full application that must be determined on its own merits, it nonetheless demonstrates the anticipated provision of a buffer strip along the railway embankment.
3	<u>For outline applications</u> , Ecological Parameters Plan.	This is a FUL application. N/A
4	Statutory Biodiversity Metric calculation demonstrating no net loss of biodiversity.	The submitted biodiversity metric indicates a projected net loss of -1.42 biodiversity units. This loss primarily arises from the removal of small areas of habitats of low to moderate distinctiveness (namely modified grassland and bramble scrub) and therefore does not raise significant concern.
5	<u>For reserved matters and full applications</u> , an Ecological Mitigation Plan to be submitted.	An Ecological Mitigation Plan is embedded in EclA and aligns with the Landscape Plan. The core bat habitat along the railway line will be buffered by a strip (11m-12m wide) of infrastructure planting including trees. As identified on the Proposed Site Plan this is required as a Dark Corridor to buffer the key commuting corridor along the railway line. The planting will be enclosed by a 2.1m tall wooden fence. The adjacent Outdoor Play Area is proposed to comprise predominantly amenity grassland, bordered by areas of species-rich grassland, species-rich hedgerow, and orchard planting. This will provide a graduated buffer to the retained core bat habitat and subject to appropriate wildlife-friendly management, the area has potential to retain some value for foraging bats.
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	The development will result in the loss of low value bat foraging habitat. The planting strip along the railway line and adjacent amenity space do not strictly align with the TWBMS on-site mitigation requirements. However, given the minor scale of the application impacts of urbanisation will be buffered, and a continuous bat corridor will be maintained.

	and Figure 6 in the TWBMS.	
7	For <u>Reserved Matters and Full applications</u> ,	A CEMP must be secured by condition. The CEMP must set out: - Measures to protect retained and created core bat habitat during construction. - Schedule of works covering enhancement and creation of core bat habitat features.
8	Application to demonstrate retained core bat habitat connects to the wider habitat network.	The planting strip or dark buffer will be continuous with the vegetation along the along the railway line which connects to the wider habitat network.
9	Application to demonstrate measure to ensure core bat habitat will remain relatively undisturbed by the effects of urbanisation.	The gable end closest to the railway corridor is unglazed. The Southview Farm Lighting Strategy V2.3. (DFL, March 2024) indicates artificial light levels along ecological receptors will be acceptable. A fence will prevent adverse impacts from encroachment into the buffer along the railway.
10	<u>For Reserved Matters and Full applications</u> , •	A LEMP must be secured by condition. The LEMP must set out: - Management objective for core bat habitat. - Measures to ensure long-term management of core bat habitat. - Management roles and responsibilities. - Core bat habitat delivery time scales. - Time scales for delivery of functional alternative green space. - Review and monitoring mechanism.
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.	Lighting impacts and mitigation is provided in The Southview Farm Lighting Strategy V2.3 (DFL, March 2024).
12	An appropriate lighting monitoring regime has been provided.	Anticipated to be secured by lighting condition.
13	Greenfield sites 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.	The eastern 0.19 hectares of the site is green field and lies in the yellow zone. The development will result in the loss of low value bat foraging habitat. All non-residential developments on green field sites are required to contribute £30,000 per hectare towards habitat mitigation detailed in Appendix 1 of the TWBMS. The total financial contribution to mitigate the burden would be £5,700 plus legal and admin fees will be payable on commencement of development through S106, S111 or unilateral undertaking. This AA assumes this contribution will be secured.

15	Grey Hatched Zone: The applicant agrees that a financial contribution towards the Council led scheme for mitigating recreational impacts.	As there is no net increase in residential dwellings recreational impacts are not predicted.
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CONCLUSION	
Is the project likely to affect site integrity? Significant adverse impacts on the integrity Bath and Bradford on Avon Bat SAC are not predicted. As required by the Conservation of Habitats and Species Regulations 2017 (as amended) an Appropriate Assessment has been completed by the LPA with a favourable conclusion.	
a) Alone?	No
b) In combination with other plans or projects?	No

Compliance with CP50 and NPPF

The Site is reported to comprise habitat and features of low nature conservation value including an abandoned farmhouse and gardens, fields of species-poor modified grassland and scrub. However, the site is located adjacent to a vegetated railway corridor that is part of an ecological network recognised as a wildlife corridor used by bats for which the Bath and Bradford on Avon Bat SAC is designated. The proposed woodland infrastructure/ woodland planting including adjacent to the embankment will buffer the corridor from the development and with conditions will ensure its function as an ecological network for commuting bats is maintained. Impacts on the SAC are discussed in the Habitats Regulation Assessment section above.

It is agreed that the predicted losses in biodiversity are due to the loss of small areas of low distinctiveness habitats.

The risk of adverse impacts on protected and notable species (birds, reptiles and Dormice) is low and can be appropriately managed through a Construction Ecological Management Plan and Landscape Ecological Management Plan secured through condition. These should be prepared in accordance with the recommendations in the EclA and specified on the embedded Ecological Mitigation Plan.

The farmhouse is a confirmed roost used by small numbers of Common Pipistrelle bats. A European Protected Species (EPS) bat Mitigation Licence will need to be obtained for the lawful construction of this development. In terms of ecology, sufficient information has been provided to ensure that favourable conservation status of (insert name of species/s) can be maintained should the application be approved.

Biodiversity Net Gain (BNG)

Under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) this application is required to deliver 10% Biodiversity Net Gain (BNG). The Biodiversity Gain Plan condition will automatically apply if approval is forthcoming.

A completed statutory metric calculation (BNG_Metric_1.0.4_26-226) calculating the baseline and predicted post- development biodiversity units of the site has been submitted and shown on the Baseline Habitats (BNG) maps).

Information in the completed on-site baseline habitat tabs is accepted as accurate based on the information submitted. The pre-development (baseline) situation is summarised below.

	2.07Habitat units
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On-site pre-development (baseline) biodiversity value	0.05 Hedgerow units
	0.00 Watercourse units
Are there any <u>irreplaceable</u> habitats on-site?	No
Has any habitat <u>degradation</u> of occurred?	No

The proposed BNG is considered not 'significant' due to:

- (i) the scale and nature of the application (minor);
- (ii) the majority of post development units being provided off-site.

A Habitat Management and Monitoring Plan (HMMP) will not be required.

The Landscape Plan broadly aligns with the Proposed Habitat Parcels (BNG) plan. The metric indicates that the development would result in on-site losses in biodiversity. Delivery of mandatory net gain is proposed via a combination of on-site measures and off-site compensation. Confirmation of how the development will achieve BNG is a post-determination matter however it is recommended that the following issues are addressed in the Biodiversity Gain Plan and supporting documents:

- The intention to deliver other neutral grassland and modified grassland of moderate condition in the Nursery Outdoor Play area is welcomed but seems unrealistic given the management limitations and likely high level of usage.

CONDITIONS:

COMPLIANCE WITH SUBMITTED DOCUMENTS

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

- Ecological Mitigation Plan embedded in the Ecological Impact Assessment. Southview Farm. Ref: B25_074_EclA. (Bengrove Ltd, 2/02/2026).
- Landscape Plan. Drawing No. 259_GLA_XX_XX_DR_L_1001 Rev P2. (Greenhalgh, 09/01/2026).
- Southview Farm Lighting Strategy V2.3. (DFL, March 2024).

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

CONSTRUCTION METHOD STATEMENT (CMS)

No development shall commence on site (including any vegetation removal or works to existing structures), until a Construction Method Statement has been submitted to, and approved in writing by the Local Planning Authority. The Construction Method Statement shall include all precautionary measures to be implemented during the construction period, for the protection of sensitive habitats and species known to be present within or adjacent the site, with particular reference to:

Bats
Birds
Badgers
Dormice
Reptiles
Core bat Habitat Buffer (infrastructure planting including trees).

The development shall be carried out in strict accordance with the approved Construction Method Statement.

REASON: To ensure adequate protection, mitigation and compensation for protected species and priority habitats throughout the construction period.

LANDSCAPE AND ECOLOGICAL MANAGEMENT PLAN (LEMP)

Prior to the start of construction, a Landscape and Ecology Management Plan (LEMP) shall be submitted to and approved in writing by the Local Planning Authority. The LEMP will include long term objectives and targets, management responsibilities and maintenance schedules for each ecological feature within the

development, together with a mechanism for monitoring success of the management prescriptions, incorporating review and necessary adaptive management to attain targets.

The LEMP shall be implemented in full and for the lifetime of the development in accordance with the approved details.

REASON:

To ensure the long-term management of landscape and ecological features retained and created by the development, for the benefit of visual amenity and biodiversity for the lifetime of the scheme.

Lighting

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.

This condition will be discharged when a post-development lighting survey conducted in accordance with section 8.3.4 of the Trowbridge Bat Mitigation Strategy has been submitted to the Local Planning Authority demonstrating compliance with the approved lighting plans, having implemented and retested any necessary remedial measures.

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 Bat Mitigation Strategy and the Habitat Regulations Assessment.

Informative:

Bats

The building at Southview Farm is used as a bat roost. Under the Conservation of Habitats and Species Regulations 2017 (as amended), it is an offence to harm or disturb bats or damage or destroy their roosts. Planning permission for development does not provide a defence against prosecution under this legislation. The applicant is advised that a European Protected Species Licence will be required before any work is undertaken to implement this planning permission. Future conversion of the roof space to living accommodation or replacing the roof could also breach this legislation and advice should be obtained from a professional bat ecologist before proceeding with work of this nature.

Sign off by WC Ecologist will only be given once ALL outstanding information has been submitted and agreed sufficient.

Ecologist	Date
Elizabeth Burrows	14/05/2026