

Objection to PL 2026/01072

I wish to object to this planning application on the basis that the Environmental Impact Assessments undertaken do not provide an accurate assessment of the ecological environment at, or in the vicinity of, the proposed development land north of Devizes Road and therefore the proposed mitigation cannot be relied upon to offset the harm which will be caused to the environment if this development proceeds.

The grounds submitted in support of the above are as follows:

1. The EIA is limited to assessing a 2km radius of the development site.
2. The EIA fails to assess, consider or understand the network of bat species that interconnect throughout this area or the importance of Hilperton as a green flight corridor.
3. The EIA fails to identify the importance of one of the stables (and potentially the hay barn) on the site as a bat roost.
4. The EIA fails to take into account the different hunting, roosting and flight habits of local bats when assessing the impact of the proposed development area.
5. Additional points of note including the lack of any cumulative assessment.

1. The EIA is limited in scope to a 2km radius of the development site

I have already submitted an objection in support of this point in relation to bat populations. The comments below relate to the impact on other sections of the ecological landscape.

The EIA author states that the EIA covers a 2km radius as a 10km radius only applies to "international sites".

Whilst this might be a standard rule of thumb for initial desk data studies, it is not an absolute rule that EIAs are obliged to follow.

A 2km radius is generally suggested for nationally designated statutory sites such as SSSIs and local nature reserves and a 10km radius for internationally designated sites such as Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites.

There are no Ramsar sites which need to be considered in relation to this planning application.

Claiming 10km is only for international sites is an over simplification as, depending on the specific impacts of the project, the radius for national statutory sites must often extend beyond 2km. For example, if a proposed site alters a river system or discharges waste water, this can impact national statutory sites downstream. If there is a Special Site of Scientific Interest 7km downstream on the same river network for example, it falls directly within the Zone of Influence (Zoi). The proposed development site will undoubtedly discharge waste water if 80 plus houses are built and therefore the zone should be extended to consider the impact on water courses further downstream.

The development site is next to the Paxcroft Brook in Hilperton which flows to the south and south west of the site. This stream flows directly into the **River Biss**, which in turn merges with the **Bristol Avon** just north of Trowbridge. Downstream from the proposed development are:

- **Winsley Mines SSSI** situated near Bradford-on-Avon, just above the Avon valley. They are legally protected because they act as vital hibernation and swarming sites for rare bat species.
- **Brown's Folly SSSI** is located further downstream along the Avon valley cliffs near Bathford. This site is protected for its unique steep woodland habitats, rare wild plants, and extensive underground mine networks.
- **Stidham Farm SSSI**: This site is protected for its unique geological river terrace gravels.
- **Clevedon / Avon Gorge SSSI**: Much further downstream where the river meets the sea. This massive gorge contains nationally rare plant life and internationally important limestone cliffs.

No evaluation of the potential impact on these sites has been considered in the EIA.

In relation to the bat populations, the assessment fails to consider the wider impact on the bats of Salisbury Plain. Salisbury Plain is only referred to at the beginning of the assessment in relation to grassland and the marsh fritillary butterfly. No mention is made of the bat populations or their hunting and commuting pathways and yet the local bat population is intrinsically linked to the SAC of Bradford on Avon and Bath.

If a proposed housing development is likely to have an impact on functional land e.g. dark flight corridors, mature tree lines, river valleys or insect rich pastures which a bat

population relies upon, the EIA's ZoI must legally extend to capture these paths regardless of the 2km rule of thumb.

The developer's 2km rule is inadequate for an 80 house plus development in this specific region. Due to the mobile nature of bats and birds, the ZoI must extend to a 10km screening boundary. By using a 2km radius in the EIA, functionally linked foraging bat habitats have been ignored.

2. The EIA fails to assess or understand the network of bat species that interconnect throughout this area or the importance of Hilperton as a green flight corridor.

The proposed development site is 6 to 8 miles (9 to 12km) from Salisbury Plain where many species of bat actively forage, even during military activity. Surveys undertaken across the Salisbury Plain Training Area (SPTA) and nearby garrisons have confirmed the presence of the following species of bat:

- Barbastelle
- Greater Horseshoe
- Pipistrelle, both common and soprano
- Bechstein's

Local monitoring has also recorded:

- Natterer's
- Whiskered
- Brown long eared
- Noctules
- Serotine

The Barbastelle (one of Britain's rarest species of bat) and other types of bat can travel significant distances – up to 10km or more - from nearby roosts to forage over the Plain. Hilperton is only 7 – 10 miles (11 to 16km) north west of the main training boundary areas.

Radio tracking studies in Wiltshire have shown that Barbastelles are incredibly fast, strong flyers that regularly travel up to 12 miles (20km) to seek out rich hunting grounds. It is highly likely therefore that they travel to Hilperton.

Pipistrelles and other smaller species tend to remain closer to home but the larger and more rare species of bat found on Salisbury Plain are highly mobile and routinely travel long distances.

The EIA ignores the connection between Salisbury Plain, the Bath SAC and the village of Hilperton which lies between the two. Whilst the Greater Horseshoe bat tends to forage close to its roost, it is highly migratory between summer breeding spots and winter hibernation caves, travelling 18 to 30 miles (30 to 50km) across Wiltshire. Even if a housing development is located 10 miles from Salisbury Plain, it can still have a significant and direct impact on the region's rarest bats and can cut them off from reaching their winter hibernation roosts.

When travelling longer distances, bats do not fly across open country. They navigate along continuous lines of hedgerows, tree lines and river valleys to stay protected from wind and predators. If a development removes a single major hedgerow network or a woodland fringe 10 miles away, it acts as a roadblock meaning the bats from Salisbury Plain could be cut off from reaching their historic summer feeding grounds or hibernation sites.

Between October and April, bats hibernate. During this time, they require cold but above freezing temperatures and high humidity. They find this in our area in the underground mines of the disused Bath Stone mines stretching across Wiltshire and its borders and which are situated across the area of Box, Bradford on Avon, Corsham and the Limpley Stoke Valley. These locations make up the Bath and Bradford on Avon Bats Special Area of Conservation (SAC).

Horse paddocks and agricultural fields next to Trowbridge Rugby Club are lined with ancient hedgerows. Some are proven to be over 400 years old. These act as physical navigation aids for the Bechstein, Greater Horseshoe and Barbastelle bats. Forcing roads and/or housing access points through these hedges will break the acoustic tracking line bats use to navigate and hunt.

The EIA does not consider the impact the proposed development will have on the Bechstein bat population in Trowbridge. The Bechstein bat is listed under the European Habitats Directive as a protected species. It is a critically rare myotis bat that is highly reliant on the ancient, mature trees in Green Lane Wood which support a regionally and internationally significant colony of Bechstein's bats. Radio-tracking and ecological surveys show that bats from Green Lane Wood and nearby Biss Wood are part of a linked regional population. Clanger and Picket Woods (an SSSI due to its status as ancient woodland supporting rare wildlife and plants) supports its own Bechstein's bat colonies and has close ecological ties to neighbouring woodlands. The bats use linked hedgerows, streams, and wildlife corridors to commute up to 4 km away from their core

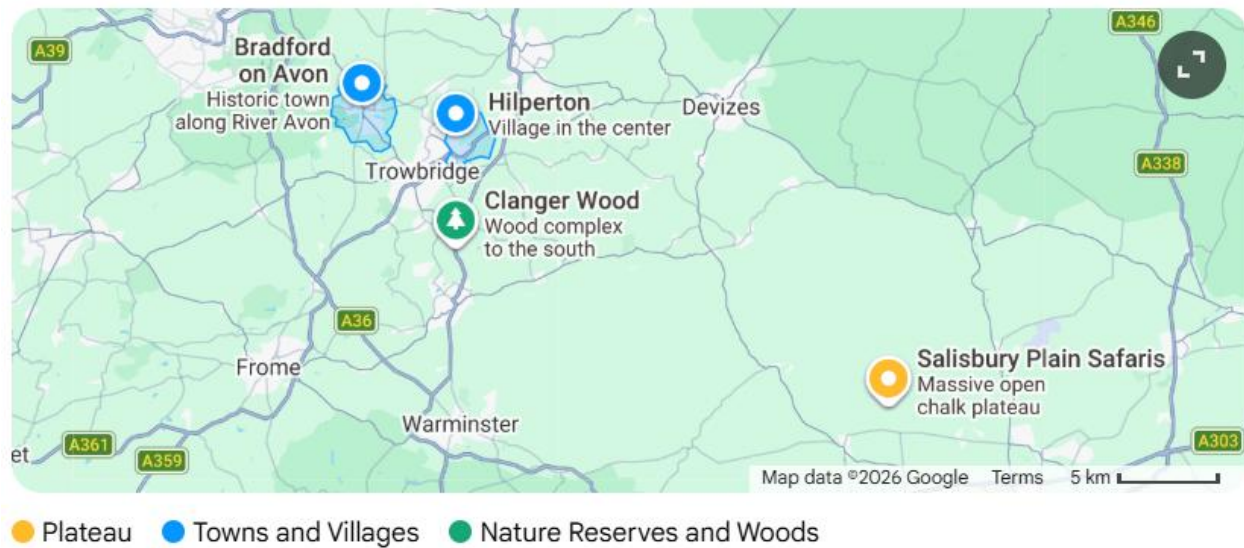
roosts, traveling toward sites like Southwick Country Park Nature Reserve to feed. Green Lane Wood is 2km from the proposed development site.



These woodlands form part of a wider network connected to the Bath SAC which the Salisbury Plain bats are also connected to. All bats in this area use Hilperton as a flight corridor and to suggest that there is no evidence that the site or either of its boundaries represents a significant commuting corridor for any species cannot be credible.

The bats from Bath, Salisbury and the local woods are interconnected, sharing the green flight paths, hunting grounds and migratory routes across Hilperton. The river and canal also provide an important navigation route for the myotis bats and it is highly likely that there are also colonies of Daubenton's bats (also a myotis bat) which hunt along watercourses. The high number of bat populations linked to this area is why almost all of Hilperton Parish is within a yellow protection zone.

During the summer, the bats use historic breeding spots and even historic cave dwellers such as the Greater Horseshoe now prefer environments like upper attic voids and the uninsulated loft spaces of older manor houses, barns and church lofts across the settlement bordering Salisbury Plain and Cranborne Chase.



The village of Hilperton in Wiltshire lies directly on the Salisbury Plain bats' flight paths to the Bath Stone Mines. Hilperton is a crucial geographical funnel or flight corridor which it must cross to reach winter safety (in the Bath stone mines). The bats also rely on the tree lined canal corridor as an insect rich navigation route.

The EIA concludes that there is no evidence to suggest that the proposed development site or either of its boundaries represent a significant/landscape bat commuting corridor. As such, the site is considered to be of local to district importance for bats. The evidence, as set out above, contradicts this conclusion.

It also ignores the local planning precedent which requires the Trowbridge Rugby Club to observe a strict 2200 floodlight curfew (earlier on Sundays and Bank Holidays) precisely because this area is a documented bat commuting corridor. The unlit paddocks north of Devizes Road provide a vital dark sanctuary and functional linkage to the Bath and Bradford on Avon Bats SAC.

3. The EIA fails to identify the importance of the active stable on the site as a bat roost.

The proposed development site includes a stable complex, a hay store, an active stable and a static caravan. For assessment purposes, the disused stables are referred to as B1, the active stables as B2 and the haybarn as B3. The updated EIA assessment of August 2026 adopts the conclusions of the previous EIA stating that only B1 is identified as an active roost after DNA analysis on droppings found throughout the stable units and within the loft void above the stable kitchen confirmed the presence of Greater

Horseshoe bats. It is noted that the stable previously identified as active is no longer active as a stable.

Planning permission for this site was refused in December 2023 on the basis that (1) there was insufficient survey information and (2) there was inadequate mitigation in relation to the Trowbridge and Westbury Bat Mitigation Strategy (TWBMS) and the potential loss of roosts on site. The developer subsequently commissioned Nicholas Pearson Associates (NPA) to undertake bat surveys to inform a future application. GE Consulting were instructed to compile and coordinate ecological works to inform an updated planning submission.

GE Consulting undertook an EIA and Shadow Habitats Appropriate Assessment in February 2026. Wiltshire Council requested further information and a revised submission was provided in August 2026.

Pages 27 and 28 of the EIA dated 7th August 2026 states:

"An updated Building Inspection of all Site buildings was conducted in June 2026. No roosting bats were noted utilising any of the buildings at the time of survey, and the evidence present (via droppings within B1) remained as per the previous inspection in 2025.

In their previous comments, Wiltshire Council stated: "Surveys confirm that Building B1 supports a day roost for small numbers of common pipistrelle, greater horseshoe (GHS), and lesser horseshoe (LHS) bats. It is not agreed that the active stable building is not used by roosting bats. Static detector data confirm that GHS and LHS bats enter the building, and the absence of droppings or feeding remains is likely attributable to regular stable cleaning. It is therefore considered highly likely that the building is used by GHS and LHS bats as a night roost".

The inactive Stables B2 and Hay Barn B3 were subject to a reinspection concurrently with the one as described above. Building B2 is not currently in use as an active stable, and no evidence of bat roosting (droppings, feeding remains etc) was noted. As such, the building is not considered to represent a night roost for either horseshoe species, as suggested by WC comments.

The EIA of August 2026 adopts the previous conclusion that the lack of droppings and feeding remains and the short duration [bat] calls suggests the active stables do not represent a Greater Horseshoe or Lesser Horseshoe night roost.

Trail cameras and static bat detectors were deployed in the active stables (B2) for between 10 to 12 nights in each month from June to September 2024. These returned readings of 27 Greater Horseshoe bats and 379 Lesser Horseshoe bats. This indicated the building was being used as both a day and a night roost.

In the limitation section of the EIA of August 2026, it is stated that given the openness of the active stables and lack of available positions to deploy the automated detector, it is likely bat activity i.e. incidental passes outside the stable, would not have been recorded and therefore this data alone could not be relied upon to determine the presence of a night roost. The EIA therefore used "the patterns of any records" and the searches for evidence on the floor to determine the likely presence or absence of these bats.

The EIA therefore relies on the lack of food fragments on the floor and the type of calls recorded to determine that the active stables, B2, are not a roost, rather than relying on data obtained from a bat detector. This is even more contradictory when the limitations sections states that some bat calls may well have been missed due to the open character of the stables and the lack of suitable positions for deploying an automated detector. In other words, there could well have been more evidence.

Roosts

The Conservation of Habitats and Species Regulations 2017 defines a bat roost as "any structure or place used for shelter or protection, regardless of whether bats are present at the time".

Bats use a variety of roosts throughout the year. The lack of droppings and feeding remains found in the active stable may simply indicate that the area is not currently being used as a major maternity colony or a heavily used night feeding perch but legally, it can still be classified as a roost. It is wrong to rely solely on the absence of feeding remains or short duration calls, as the EIA seems to do, to determine that the active stables have a low probability of being a roost.

A **day roost** is often used by solitary bats or a small number of males or non-breeding females, to rest quietly during the day without leaving a large trace.

A **transitional/opportunistic roost** is used temporarily in the spring or autumn as bats move between their summer breeding grounds and winter hibernation sites.

Horseshoe bats hang freely from open joints or rafters rather than crawling into tight crevices. Droppings can fall into hidden wall cavities or into stored machinery. The droppings of a Greater Horseshoe bat are exceptionally fragile and dry and in a drafty stable, they will quickly crumble into microscopic dust and disappear.

The active roost, B2, clearly has rafters, as shown in the photograph.

There is a lack of information in relation to the hay store, B3. The EIA states that photographs could not be taken due to vegetational restrictions. The conclusion simply states "no suitable features identified" and "no evidence of roosting bats identified." Was this conclusion reached on the same basis as the conclusion given for the active stables, B2? There is no description of the interior of the barn which could well have rafters or other suitable features which the bats could use to "hang up".

Short Duration Calls

Short duration calls do not provide substantial or exclusive evidence that a building is not being used as a roost. Short duration calls can indicate:

- Commuting behaviour – that bats are using the stable as a flight corridor or thoroughfare to safely access foraging habitats.
- Exploratory behaviour – assessing the site as a potential roosting site.
- Brief rest stops – a bat may "hang up" for a few minutes to groom or rest before flying back out which leaves zero feeding waste and minimal, easily missed droppings.

The EIA has failed to properly assess the buildings or consider the specific habits of the bats which roost there. The conclusion that the active stables and potentially the hay barn are not roosts cannot be relied upon as the methodology for reaching this conclusion is inadequate and flawed.

4. The EIA fails to take into account the different hunting, roosting and flight habits of various species of bat when assessing the importance of the area to bats.

In assessing the presence of bats with bat detectors, the EIA states there is no evidence to suggest the proposed development site or either of its boundaries represents a significant/landscape commuting corridor for any of these species. It concludes as a result that the site is of local to district importance only.

The surveys group the myotis species calls together and state they account for only 4.82% of the total calls recorded.

The myotis genus is the largest and most diverse group of bats in the world and for us, in the UK, it includes the Bechstein, Natterers, Daubenton's, Whiskered, Brandt and the Greater Mouse Eared Bat.

Grouping myotis species together in this way and reporting that they only represent 4.82% of the total activity is a standard data outcome for general bat surveys but is a highly misleading procedure when evaluating individual and specific planning applications.

The conclusion that this low percentage equates to a low percentage of the local bat population is ecologically flawed for the following reasons.

In almost every UK static bat detector survey, common and soprano pipistrelles make up to 80% to 95% of all recorded calls. This is because pipistrelles hunt and forage differently from myotis bats. Pipistrelles are loud echolocators and fly back and forth over a single field multiple times when hunting. They also chatter constantly. A single pipistrelle foraging for 20 minutes can trigger a bat detector hundreds of times. Myotis bats hunt along linear, dark corridors like hedgerows and do not hunt in the same way pipistrelles do.

By contrast, myotis species, especially the Bechstein, are quiet, "whispering" bats that emit faint calls and use targeted, linear flights when hunting. It is notoriously difficult to identify them on a bat detector or with analytical software used to decipher bat calls. Many bat experts consider the only reliable way to determine if Bechstein bats are present requires more than acoustic techniques alone.

4.82% of the total bats recorded demonstrates that this is a consistent and established use of the area by myotis bats. It does not mean that myotis bats are not there. It means they simply do not flood the bat detector microphone in the way that pipistrelles do.

Because the calls of Daubenton's, Natterer's, Whiskered and Bechstein bats overlap significantly, computer software cannot reliably tell them apart.

By grouping the myotis species into a 4.82% "lump", the survey treats them as a single entity, failing to specify if those calls include the highly protected Bechstein colony moving past the area. By failing to separate the myotis calls, the presence of Bechstein's bats is not ruled out.

Greater Horseshoe bats echolocate at roughly 80kHz and Lesser Horseshoe bats at an extremely high 110 kHz. Ultra high frequencies suffer from massive atmospheric attenuation meaning the sound loses energy rapidly in the air. A bat detector usually needs to be within a few metres of a Horseshoe bat to record it.

Common pipistrelles call at 45 kHz and soprano pipistrelles at 55 kHz. These lower frequencies travel much further through the air, triggering bat detector microphones from tens of metres away.

Barbastelles use a unique dual-harmonic alternating system of echolocation (low frequency via mouth, higher frequency via nose) and very quiet "stealth" intensities. Automated software or poor recordings can sometimes clip or misinterpret these alternating clicks, throwing false positives for other species like pipistrelles or serotines if not manually verified with sonograms.

Both Greater and Lesser Horseshoe bats are highly adapted for foraging in dense vegetation, woodland and close to the ground. They use constant frequency (CF) calls to detect the fluttering wings of insects amid leaves. Because they hunt in tightly "cluttered" spaces, they are often shielded from acoustic detection.

Horseshoe bats emit their echolocation calls through their nostrils using a specialised fleshy nose-leaf. This focuses the ultrasound into a highly directional, narrow cone. If the bat is not flying directly towards a microphone, the detector will miss the call.

If a pipistrelle bat and a horseshoe bat are foraging in the same area, a standard bat detector will repeatedly trigger for a pipistrelle whilst completely missing the horseshoe unless it flies directly past the microphone lens. Detectors must be tuned up to 80kHz or 110 kHz to actively search for horseshoe bats or they will remain completely silent.

The EIA fundamentally fails to consider the habits and calls of different species of bats meaning that the conclusions it reaches cannot be relied upon.

The EIA also states that the Devizes Road's (A361) connectivity to the Bechstein's core roosts (at Green Lane Wood etc) is inhibited/isolated by existing sources of artificial lighting from the adjacent A361 due to street lighting and the lights from Trowbridge Rugby Club. This is an unproven and contested assertion and one often used by developers to downplay a site's ecological value.

Official radio tracking studies conducted across Trowbridge and Hilperton have explicitly recorded Bechstein bats actively crossing the A361/Devizes Road to reach foraging zones despite the existing streetlights.

Whilst Bechstein bats prefer dark, dense tree canopies, they do not treat a lit road as an absolute brick wall. Local observations show they use low lying dark gaps, unlit fields

near the roundabout or drop underneath the glare of streetlamps in order to maintain their historic migration routes.

Even if the A361 acts as a partial barrier, the dark fields and hedgerows at the proposed site provide the ***last remaining dark buffer*** which allows bats to successfully navigate past that highway. If the development is allowed, that last buffer will be removed.

Horse paddocks and agricultural fields next to Trowbridge Rugby Club are lined with ancient hedgerows. Some are proven to be over 400 years old. These act as physical navigation aids for the Bechstein, Greater Horseshoe and Barbastelle bats. Forcing roads and/or housing access points through these hedges will break the acoustic tracking line bats use to navigate and hunt.

Bats do not only use continuous linear features for navigation. They can easily cross gaps where a line is broken. When echolocation clues drop off due to a gap, bats seamlessly switch to or combine other senses including vision, magnetic fields and olfactory clues to cross open spaces. However, whilst bats can cross gaps up to a certain threshold, usually under 10 to 12 metres before completely altering their route, a larger gap such as a housing development, will sever a primary commuter route and isolate certain light sensitive (myotis) species from their foraging grounds as they may refuse to cross the area due to a highly perceived risk of predation. Additional street lighting, domestic spill from house windows and headlights from cars on the new estate would project light upwards and outwards onto previously pitch black flight paths turning the development into an impassable barrier on the bats' autumn trek westwards.

The Bechstein bat is one of the rarest bat species in the UK. And because the development site is potentially going to have an impact on a protected European species, developers must provide 100% mitigation.

Under the UK Habitat Regulations and Wiltshire Council's Bat Mitigation Strategy, planning decisions are governed by the Precautionary Principle which is that if a claim is speculative or lacks iron clad long term empirical evidence, the Planning Inspectorate will rule that uncertainty equals a refusal.

Wiltshire Council cannot safely accept the applicant's conclusions without further evidence provided by advanced species-level tracking (such as mist-netting or radio-tracking) to thoroughly assess the impact of severing this corridor.

5. Additional Points of Note

The EIA fails to assess the impact on a host of other species in this area including beavers which are thriving further downstream at locations which are undisclosed due to the sensitive nature of their environment.

The EIA refers to the proposed development site being "negligible" for amphibians and yet greater crested newts were identified within 2km of the site between 2001 and 2006.

The EIA has failed to consider the cumulative impact of past, future and present housing developments in the area in accordance with Schedule 4 paragraph 5(e) of the EIA Regulations 2017. This requires the EIA to include a description of the likely significant effects of the development on the environment resulting from the cumulative effect from proposed, existing and/ or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources.

There are significant proposals for housing development of other land in Hilperton, including the proposed development called "Greater Whaddon" which is in close proximity to this site. Extensive housing is also under construction at West Ashton and along Elizabeth Way, with a substantial number of houses already built. There are also other housing developments, past, existing or proposed, in Trowbridge and in neighbouring locations including at Semington, Berryfields and Melksham.

Assessing the cumulative effect of all these developments on the environment is critical given Hilperton's importance to bat populations.

Liz Gwinnell

Volunteer for the Bat Conservation Trust