

Habitats Regulations Assessment

Screening Report

Trowbridge Rugby Football Club, Paxcroft, Hilperton, Trowbridge, Wiltshire, BA14 6JB

Prepared for: Trowbridge Rugby Football Club

Prepared by: Andrew Lunt - Agent

Date: 24th September 2026

Planning Ref: 2026/02164

1. Introduction

1.1 This Habitats Regulations Assessment (HRA) Screening Report has been prepared to accompany a planning application for the erection of a new timber-framed gymnasium building at Trowbridge Rugby Football Club, Trowbridge, Wiltshire, involving the extension of an existing concrete hardstanding pad and the demolition of an existing timber shed (currently used as the club gym) standing on that pad.

1.2 The purpose of this report is to screen the proposed development against the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended) ("the Habitats Regulations"), to determine whether the proposal is likely to have a significant effect, either alone or in combination with other plans or projects, on a European protected site, and therefore whether an Appropriate Assessment is required.

1.3 The site lies within the administrative area of Wiltshire Council and falls within the Bat Consultation Zone (Core Area) associated with the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC), as identified in the Bat Special Areas of Conservation (SAC) Planning Guidance for Wiltshire (Wiltshire Council / Natural England, 2015) and the Trowbridge and Westbury Bat Mitigation Strategy (TWBMS) SPD (adopted July 2025). Mary Holmes, Ecology Officer at Wiltshire Council, has confirmed that the site falls specifically within the TWBMS 'yellow risk' medium zone and within a core buffer zone for Bechstein's bat. This screening report has been prepared having specific regard to that guidance and to the ecology comments received.

1.4 This report (Revision B) supersedes the previous version, which reserved a firm screening conclusion pending a Preliminary Roost Assessment (PRA) of the shed. It has been updated to take account of:

- **Bat Survey (PRA):** Crossman Ecology, Bat Survey – Trowbridge Rugby Club, Hilperton Drive, Trowbridge, Wiltshire, BA14 6JB, ref. CE26-5991, Issue 1, 21 September 2026 ("the Bat Survey"). The survey comprised a bat (and bird) scoping survey, equivalent to a PRA, carried out on 21 September 2026 by Fairbrass Knowles MCIEEM, a Natural England licensed bat worker (licence no. 2015-12392).
- **Biodiversity Net Gain:** the Statutory Biodiversity Metric – Small Sites Metric (v1.2.3) and accompanying habitat plan for the site (Trowbridge Rugby Club Gym, SSM f408, v5), and the Biodiversity Net Gain (BNG) position for the application (see Section 6).

2. The Proposed Development

2.1 The proposal is for the construction of a new single-storey timber-framed gym building, to be sited on and immediately adjacent to an existing concrete hardstanding pad on the north-east corner of the club car park, adjacent to the clubhouse and playing fields.

2.2 Key characteristics of the proposal relevant to this assessment are as follows:

- The new building, of 16 m x 7 m (c. 112 m² footprint), will be constructed on the existing concrete pad, which will be extended onto adjoining car park hardstanding to accommodate the full building footprint.
- No new foundations are required; the building will bear on the existing and extended concrete slab.
- The area of pad extension is currently hardcore/gravel (chippings) car park hardstanding, used in association with the existing club facilities, and does not support vegetation, semi-natural habitat, trees, hedgerows or other features of ecological value. The Small Sites Metric records the entire works area (c. 115 m²) as 'Developed land; sealed surface' (c. 27 m²) and 'Artificial unvegetated, unsealed surface' (c. 88 m²).
- The gross internal floor area of the new building is under 150 m².
- An existing timber shed (approximately 6 m x 5 m), currently standing on the concrete pad and used as the club gym, is to be demolished to allow construction of the new gym building. (The Bat Survey describes the replacement building as approximately 17 m x 7 m; the application proposal is 16 m x 7 m. The difference does not affect the survey's findings, which relate to the existing shed.)
- The shed has been inspected by a licensed bat ecologist and assessed as having Negligible bat roosting suitability, with no evidence of bats or nesting birds (see Section 4.2).
- No trees, hedgerows or watercourses lie within or adjoining the application site or works area, and no boundary vegetation will be affected by the proposed works.
- A single PIR-controlled, downward-facing entrance light is proposed at the new building, sited more than 100 m from any boundary vegetation (see Section 4.4).

3. European Site Considered

3.1 Bath and Bradford-on-Avon Bats SAC

3.1.1 The Bath and Bradford-on-Avon Bats SAC is designated for its populations of greater horseshoe bat (*Rhinolophus ferrumequinum*), lesser horseshoe bat (*Rhinolophus hipposideros*) and Bechstein's bat (*Myotis bechsteinii*). The SAC comprises a network of underground sites (mines, caves and tunnels) used for hibernation, breeding and swarming, supported by surrounding grassland, woodland, hedgerows and watercourses used for foraging and commuting.

3.1.2 The application site lies on the eastern edge of Trowbridge, within the grounds of the existing Rugby Football Club. The site falls within the 'yellow risk' medium zone of the Trowbridge and Westbury Bat Mitigation Strategy (TWBMS) Supplementary Planning Document (adopted July 2025), which identifies areas where habitat has been shown to be of importance to the Bath and Bradford-on-Avon Bats SAC population. The site also lies within one of the core buffer zones identified for Bechstein's bat, and Wiltshire Council has confirmed that all three qualifying SAC bat species — greater horseshoe, lesser horseshoe and Bechstein's bat — are known to commute and forage in the vicinity of the site.

3.1.3 This designation is a materially more sensitive starting point than a site simply falling within the wider Bat Consultation Zone, and is reflected in the assessment below, in particular in relation to foraging and commuting habitat (Section 4.3) and in-combination effects (Section 4.7).

3.1.4 The Bat Survey's desk study (MAGIC) identified no statutory sites designated for bat conservation within 4 km of the site. This is consistent with the component underground sites of the SAC lying some distance away. It does not, however, reduce the relevance of the TWBMS designation: the TWBMS zones map the functionally linked foraging and commuting landscape used by the SAC bat populations outside the SAC boundary, and it is on that basis that this screening is required.

3.1.5 The relevant Conservation Objectives for the SAC are to ensure that, subject to natural change, the integrity of the site is maintained or restored as appropriate, and in particular that the extent and distribution of supporting habitat, and the populations of qualifying bat species, are maintained.

3.1.6 No other European sites are considered to have the potential to be affected by this proposal given its nature, scale and location.

4. Assessment of Likely Effects

4.1 Wiltshire Council's SAC guidance identifies the principal pathways by which development can affect the SAC's qualifying features as: loss of or damage to roosts; loss or modification of foraging habitat; loss or fragmentation of commuting corridors; artificial lighting; noise and vibration; pollution (dust/fumes); and increased recreational pressure. Each is considered below in relation to the proposed development.

4.2 Roosts

4.2.1 The proposed works include the demolition of the existing timber shed on the concrete pad. Buildings and structures, including outbuildings and sheds, are identified in Wiltshire Council's SAC guidance as potential bat roost features, and the previous version of this report therefore recommended that a Preliminary Roost Assessment be carried out by a licensed bat ecologist before a screening conclusion could be reached on this element of the proposal.

4.2.2 That assessment has now been completed. The Bat Survey (Crossman Ecology, ref. CE26-5991) was undertaken on 21 September 2026 by Fairbrass Knowles MCIEEM, a licensed bat worker, and included an internal and external inspection of the shed for bats and field signs of bats (droppings, urine staining, feeding remains) and an assessment of its suitability to support roosting bats.

4.2.3 The Bat Survey found that:

- the shed is a very basic, off-the-peg sectional building of bolt-together, single-skin timber panels of tightly fitted tongue-and-groove planks, all present, in good condition and showing no significant crevices;
- the low double-pitched roof is clad in mineralised felt which remains well fitted and sealed;
- the interior is a single open bay with no roof void, the walls and ceiling being formed by the reverse of the external boards;
- no droppings, staining, feeding remains or bats were observed, and there was no evidence of nesting birds; and
- the shed, as a small and well-sealed building, provides no significant roosting potential and is assessed as having Negligible Roosting Suitability (Bat Survey, paras. 3.7–3.8).

4.2.4 Under the Bat Conservation Trust Good Practice Guidelines, a building of Negligible suitability does not require further presence/absence (emergence or re-entry) surveys, and the Bat Survey does not recommend any. The Bat Survey recommends only that works proceed under a precautionary approach, with all site workers vigilant and works stopping immediately, and advice sought from the ecologist or Natural England, in the unlikely event that a bat is found (Bat Survey, para. 4.5).

4.2.5 This confirms and supersedes the non-specialist visual assessment in the previous version of this report. On the basis of the Bat Survey, the demolition of the shed is not considered capable of resulting in the loss of, or damage to, a roost used by any of the SAC's qualifying bat species, and no Natural England licence is required. The Bat Survey findings are valid for 18 months from the survey date (i.e. until March 2028), provided there is no significant change to the shed or the proposals (Bat Survey, para. 2.6).

4.3 Foraging Habitat and Commuting Corridors

4.3.1 Wiltshire Council's Ecology Officer, Mary Holmes, has confirmed that the wider site lies within a TWBMS 'yellow risk' medium zone and within a core buffer zone for Bechstein's bat, and that all three qualifying SAC bat species are known to commute and forage in the vicinity. This confirms that the site as a whole forms part of the functional landscape supporting the SAC population, notwithstanding the developed, club-use character of parts of it.

4.3.2 Notwithstanding this wider context, the specific area to be developed — the existing concrete pad and adjoining car park hardstanding — does not itself comprise woodland, hedgerow, unimproved grassland, scrub, watercourse or other habitat type identified in Wiltshire's SAC guidance as directly supporting foraging or commuting activity. This is independently confirmed by the Bat Survey, which records that the site predominantly comprises hardstanding (including the car park) and closely managed rugby pitches of relatively limited value to bats, that the main body of the site contains no significant habitat component for foraging or commuting bats, and that the habitat of value lies in the tree-lined site boundaries (Bat Survey, para. 3.9).

4.3.3 No trees, hedgerows or other linear landscape features are to be removed as part of the proposed works, and no boundary vegetation, tree lines or hedgerows will be affected; all boundary planting will be retained unaffected.

4.3.4 Given the confirmed presence of commuting and foraging activity by all three qualifying species in the vicinity, the assessment does not rely solely on the absence of on-site vegetation. The relevant considerations are the retention of the site's boundary features (which the Bat Survey identifies as the part of the site with value for foraging and commuting bats, and which may link the site to Biss Wood, Green Lane Wood and the wider landscape), and the avoidance of any new barrier, illumination or disturbance along those edges. These are addressed under lighting (Section 4.4) and in-combination effects (Section 4.7).

4.3.5 On the basis that the works are confined to existing hardstanding, no boundary vegetation is removed or otherwise affected, and lighting is controlled as set out in Section 4.4, the proposal is not considered likely to result in the loss, modification or fragmentation of foraging areas or commuting corridors used by the SAC's qualifying bat species. This conclusion is reached having had specific regard to the site's designation within the TWBMS yellow risk zone and Bechstein's core buffer, rather than by treating the site as being of no functional importance.

4.4 Lighting

4.4.1 A single external light is proposed at the entrance to the new building, for security and safe access purposes. This will be a PIR (passive infrared)-activated, downward-facing (fully cowled/shielded) luminaire, meaning it will only illuminate briefly when triggered by movement at the entrance, will not remain on continuously, and will direct light onto the ground/entrance area rather than outward or upward.

4.4.2 The proposed entrance light is located more than 100 m from the nearest site boundary, and therefore from any boundary vegetation, tree line or hedgerow that could function as bat commuting or foraging habitat. Given this separation distance, combined with the PIR-controlled, downward-facing and cowled nature of the fitting, there is no realistic pathway for direct or indirect illumination of retained habitat features, including the western boundary trees on which the Bat Survey recommends bat and bird boxes be installed (see Section 7).

4.4.3 A PIR-controlled, downward-facing, cowled light of this kind, sited over 100 m from any boundary vegetation, is in accordance with Bat Conservation Trust best practice guidance for minimising impacts of artificial lighting on bats. This lighting is not considered likely to result in a significant effect on the SAC's qualifying bat species.

4.5 Noise, Vibration, Dust and Construction Activity

4.5.1 Given the Negligible roost suitability of the shed confirmed by the Bat Survey, and the limited scale of the development (a single small building on existing hardstanding), construction and demolition activity is not considered likely to give rise to significant noise, vibration or dust impacts affecting the SAC's qualifying features. Standard good-practice construction management (daytime working hours only, dust suppression where required, and the precautionary approach to demolition set out in the Bat Survey and Section 7) is considered sufficient to control any minor, localised and temporary effects.

4.6 Recreational Pressure

4.6.1 The proposal is for an ancillary sports/gym building within an established rugby club, replacing an existing gym shed. It does not involve new residential development or a material increase in the number of persons visiting the site or its surroundings beyond existing club use, and is not considered likely to generate a meaningful increase in recreational pressure on woodland or other habitat used by the SAC's bat populations, in particular the Bechstein's bat colony associated with Biss Wood and Green Lane Wood, notwithstanding the site's location within the TWBMS yellow risk zone and Bechstein's core buffer.

4.7 In-Combination Effects

4.7.1 The site's location within the TWBMS yellow risk zone and Bechstein's core buffer means that in-combination effects warrant closer consideration than would apply to a site of no recognised bat interest. The TWBMS itself exists specifically to manage the cumulative effect of development across Trowbridge and Westbury on the SAC population, including recreational pressure, habitat loss and lighting.

4.7.2 Notwithstanding this, the proposal's own contribution to any cumulative effect is very limited: it comprises a single small ancillary building replacing an existing gym shed of Negligible roost suitability, constructed on existing hardstanding, with no loss of foraging or commuting habitat, no loss of boundary vegetation, and a single, low-impact, PIR-controlled entrance light sited well away from any retained habitat feature. It does not involve new residential development or an increase in visitor numbers of a kind the TWBMS is principally concerned with.

4.7.3 On this basis, while the site sits within a landscape where in-combination effects are a recognised concern, this proposal is not considered capable of making a material contribution to a significant in-combination effect on the SAC.

5. Screening Conclusion

5.1 The application site lies within the TWBMS 'yellow risk' medium zone and within a core buffer zone for Bechstein's bat, and Wiltshire Council's Ecology Officer, Mary Holmes, has confirmed that all three qualifying SAC bat species commute and forage in the vicinity. This is a sensitive location, and this screening report reaches its conclusion having given full weight to that designation, not on the basis that the site is of no ecological interest.

5.2 The previous version of this report reserved a conclusion on the proposal as a whole pending a PRA of the shed to be demolished. The Bat Survey (Crossman Ecology, CE26-5991, 21 September 2026) has now been completed by a licensed bat ecologist and assesses the shed as having Negligible bat roosting suitability, with no evidence of bats and no requirement for further survey. That outstanding matter is therefore resolved.

5.3 Having regard to the location, nature and scale of the proposed development, and in particular:

- the Negligible bat roosting suitability of the shed to be demolished, as confirmed by the Bat Survey, with no further survey or licence required;
- the location of the new building and pad extension on existing concrete and car park hardstanding, with no natural or semi-natural habitat present or disturbed within the works footprint, as confirmed by both the Bat Survey and the Small Sites Metric baseline;
- the confirmed retention of all boundary vegetation outside the development footprint, unaffected by the proposed works, preserving its function in linking the site to the wider commuting/foraging network;
- the single, low-impact, PIR-controlled, downward-facing entrance light sited over 100 m from any boundary vegetation; and
- the ancillary, non-residential nature of the development and its negligible potential to increase recreational pressure beyond existing club use;

5.4 it is concluded that the proposed development as a whole, including the demolition of the existing shed, is not likely to have a significant effect on the Bath and Bradford-on-Avon Bats SAC, or on any other European site, either alone or in combination with other plans or projects,

notwithstanding the site's location within the TWBMS yellow risk zone and Bechstein's core buffer. An Appropriate Assessment is therefore not required.

5.5 This conclusion does not rely on any measures intended to avoid or reduce harmful effects on the SAC (in the sense of the People Over Wind judgment). The precautionary working approach and lighting specification referred to in this report are standard good practice and form part of the proposal as described; they are not relied upon as mitigation to screen out a likely significant effect.

5.6 Given the site's location within a Bechstein's core buffer zone, it is recommended that this report and the Bat Survey are shared with Mary Holmes, Wiltshire Council's Ecology Officer, so that the Council, as competent authority, can confirm its agreement with this screening conclusion before the application is determined.

6. Biodiversity Net Gain

6.1 Mandatory Biodiversity Net Gain (BNG) under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by the Environment Act 2021) requires most development to deliver at least a 10% gain in biodiversity value, unless an exemption applies. BNG is a separate regime from the Habitats Regulations and is addressed here for completeness.

6.2 The planning application was submitted before 6 August 2026. The BNG position is therefore determined under the Biodiversity Gain Requirements (Exemptions) Regulations 2024 as they stood at the date of submission; the changes to BNG exemptions that took effect on 6 August 2026 have no bearing on this application.

6.3 Under those Regulations, development is exempt from the biodiversity gain condition where it is below the de minimis threshold, i.e. it does not impact an onsite priority habitat and impacts less than 25 m² of onsite habitat with a biodiversity value greater than zero, and less than 5 m of onsite linear habitat (such as hedgerows).

6.4 The baseline for the application site has been recorded using the Statutory Biodiversity Metric – Small Sites Metric (v1.2.3) and an accompanying habitat plan. The entire site (c. 115 m²) comprises:

- Developed land; sealed surface (existing concrete pad and shed) – c. 27 m²; and
- Artificial unvegetated, unsealed surface (car park chippings/hardcore) – c. 88 m².

6.5 Both habitat types are of zero distinctiveness in the statutory metric and have a biodiversity value of zero; the metric returns a baseline of 0.00 habitat units. No hedgerows, lines of trees or watercourses are present within the site, and no priority habitat is present within or affected by the works. The Bat Survey independently confirms that the car park and main body of the site contain no significant habitat, and that the habitat of value lies at the site boundaries, which are unaffected.

6.6 As the building is on hard surface and does not impact any habitat — it affects no onsite habitat with a biodiversity value greater than zero, no linear habitat and no priority habitat — the development qualifies as de minimis. The biodiversity gain condition therefore does not apply, and no on-site or off-site mitigation (including the purchase of off-site units or statutory credits) is required. The completed Small Sites Metric and habitat plan are provided as supporting evidence of the zero-value baseline.

6.7 The BNG exemption does not affect the legal protection of bats and nesting birds or the Council's duties under the Habitats Regulations, which are addressed in Sections 4 and 5. The bat and bird boxes recommended in the Bat Survey (Section 7) are voluntary ecological enhancements in line with national planning policy and the NERC Act biodiversity duty; they are not BNG provision and do not need to be secured as such.

7. Recommendations

- Demolition of the shed should proceed under the precautionary approach set out in the Bat Survey (para. 4.5): all site workers should be briefed before works start and remain vigilant, and if a bat is found at any stage works must stop immediately and advice be sought from

Crossman Ecology or Natural England (0300 060 3900). As good practice, given the site's Bechstein's core buffer location, the roof felt and any fascia/barge boards should be removed carefully by hand before the main structure is dismantled.

- Demolition should ideally take place outside the bird nesting season (March–August inclusive); if this is not possible, the shed should be checked for active nests immediately beforehand. The Bat Survey found no evidence of nesting birds.
- If the shed is not demolished by March 2028 (18 months after the survey), or if its condition or the proposals change significantly, the Bat Survey should be reviewed by a suitably qualified ecologist before works proceed.
- The single PIR-controlled, downward-facing entrance light should be installed as specified, sited more than 100 m from any boundary vegetation as described in this report. No other external lighting should be installed without further consideration of its effect on bats.
- All boundary vegetation should be retained and physically protected during construction (e.g. exclusion fencing) to ensure it is not inadvertently damaged or removed, given its function within the wider commuting network identified by Mary Holmes, Wiltshire Council's Ecology Officer, and by the Bat Survey.
- In line with the Bat Survey's hedgehog recommendations (paras. 4.6–4.9), any excavations left open overnight should be covered or fitted with a plank ramp to allow animals to escape.
- As ecological enhancements, and as recommended in the Bat Survey (paras. 4.10–4.15), at least one Chillon WoodStone bat box (south or west aspect, 3–4 m high, clear flight path) and a range of Vivara WoodStone bird boxes (32 mm, 28 mm and open-fronted, 2–4 m high, facing north to east where practicable) should be installed on mature trees along the site's western boundary. Boxes should be installed using tree-friendly fixings, without damaging the trees, and must not be illuminated.
- This report and the Bat Survey should be shared with Mary Holmes, Wiltshire Council's Ecology Officer, to confirm agreement with the screening conclusion before the application is determined, given the site's confirmed location within a TWBMS yellow risk zone and Bechstein's core buffer.

Sources

Bat Special Areas of Conservation (SAC) Planning Guidance for Wiltshire, Issue 3.0 (Wiltshire Council, Natural England and local partners, September 2015).

Trowbridge and Westbury Bat Mitigation Strategy SPD (Wiltshire Council, July 2025).

Conservation of Habitats and Species Regulations 2017 (as amended).

Crossman Ecology (2026) Bat Survey – Trowbridge Rugby Club, Hilperton Drive, Trowbridge, Wiltshire, BA14 6JB. Ref. CE26-5991, Issue 1, 21 September 2026.

Collins, J. (ed.) (2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edn). Bat Conservation Trust, London.

Town and Country Planning Act 1990, Schedule 7A (as inserted by the Environment Act 2021); Biodiversity Gain Requirements (Exemptions) Regulations 2024 (SI 2024/47), in the form in force when the application was submitted.

Statutory Biodiversity Metric – Small Sites Metric v1.2.3 (Defra, July 2025), completed for Trowbridge Rugby Club Gym (SSM f408 v5), with baseline and post-development habitat plan.

[Appendices to attach: Crossman Ecology Bat Survey CE26-5991; Small Sites Metric and habitat plan; site location and block plans; lighting specification; ecology correspondence from Mary Holmes, Wiltshire Council.]