

Shadow Habitat Regulations Assessment (sHRA)

Blind Lane, Southwick

30 September 2026

Ecology
Arboriculture
Land Management



Site Details

Site Name and Location	Blind Lane, Southwick
Central OS Grid Reference	ST 83725 55569
Client	Wain Homes Severn Valley

Report Details

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V2	30 September 2026	Anna Galvin BSc MSc	Nick Hargreaves BSc MSc MCIEEM	Nick Hargreaves BSc MSc MCIEEM	With Design Amends

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1 Introduction

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

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

1.1 Description of Proposed Development

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

1.2 Aims

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

The aims of this reports are to:

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

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

- 🦋 Ecological Impact Assessment (EcIA) – GE Consulting. Ref 2102-EcIA-AG. September 2026.
- 🦋 Proposed Site Plan – Place By Design (2026) 2056_1100A Planning Layout
- 🦋 Landscape Proposals – ACD Environmental (2026) Soft Landscape Plan WAIN24897-11E Sheet 1 – 6
- 🦋 Lighting plans – WLC Lighting Design. Ref WLC1460-1300-001 – September 2026.

2 HRA Requirement

2.1 National Site Network

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

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

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

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

2.2 Legislative Context

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

Under Part 6 ‘Assessment of Plan and Projects’, Regulation 63 (1) of these regulations, an appropriate assessment needs to be undertaken by the ‘competent authority’ using evidence provided by the applicant (if requested) and in consultation with Natural England.

“(1) A competent authority [in this instance Wiltshire Council], before deciding to undertake, or give consent, permissions or other authorisation for, a plan or project which:

Is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects); and

Is not directly connected with or necessary to the management of the that site;

Must make an appropriate assessment of the implications for that site in view of that site’s conservation objectives.

(2) A person [the applicant] applying for any such consent, permission or other authorisation must provide such information as the competent authority may reasonably require for the purposes of the assessment or to enable it to determine whether an appropriate assessment is required.”

The European Court of Justice (ECJ) has ruled that a plan or project can only be authorised if the competent authority has made certain that it will not adversely affect the integrity of any affected European site, and that “no reasonable scientific doubt” remains as to the absence of such effects.

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

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

2.2.1 Additional Information

As is often the case, the National Site Network sites referred to in this report are subject to multiple designations. The reason for this is that the legal regimes of the Birds and Habitats Directives are separate, and failure to additionally designate an existing SAC as an SPA (or vice versa) may breach legislation. A given site may have permutations of an SPA and a SAC and a Ramsar site and, as such, the boundaries of these may vary slightly or significantly and may overlap.

In England and Wales statutory National Site Network sites are also notified as Sites of Special Scientific Interest (SSSI). As such the provisions of the Wildlife and Countryside Act 1981 (as amended) are also relevant. The act imposes an important general duty on a range of authorities exercising functions which are likely to affect SSSIs. This general and overarching duty requires an authority to take reasonable steps, consistent with the proper exercise of the authority's functions, to further the conservation and enhancement of the features for which sites are of special interest. It applies whenever an authority is exercising its functions, including when it has the power to take action, and applies at every stage from the formulation of plans, to the carrying out of operations and the making of decisions.

Due to the overlap and interplay between designated sites, the assessment below draws upon information produced to support the planning application and information freely available from Natural England and the Joint Nature Conservation Committee (JNCC) in relation to designated sites.

2.3 Local Policy/Guidance

There are a number of pieces of relevant policy/guidance for several of the internationally designated sites upon which the Site may result in impacts. Those of particular relevance are outlined below and discussed further in the relevant sections:

- 🦇 Bath and Bradford on Avon Bat SAC – Planning Guidance for Wiltshire (Wiltshire Council, 2015);
- 🦇 Trowbridge and Westbury Bat Mitigation Strategy (Wiltshire Council, 2025); and
- 🦇 HRA and Mitigation Strategy for Salisbury Plain SPA (in relation to recreational pressure from residential development) (Wiltshire Council, 2024).

2.4 HRA Process

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

The definitive process for HRA is detailed in the Handbook for HRA (Tyldesley, D., and Chapman, C., 2013). The Handbook was intended to supplement government guidance (on GOV.UK) by bringing together all relevant law, policy, methodology, technical advice and good practice into one comprehensive source. Following the accession of the Planning and Infrastructure Bill in 2025 and UK Government Policy to seek to adapt the HRA process to facilitate development, the publishers of the Handbook – DTA Publications has elected to withdraw the handbook as of January 2026.

The justification for this being that the regulatory and assessment landscape will become ever more complex, with many individual sectors each having their own way of avoiding or adapting the HRA process, whilst the Regulations themselves are retained, with or without amendments. As such as it is

not a viable proposition to adapt and maintain the Handbook as a resource that would be needed to adequately navigate through all the relevant processes in England.

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

The HRA process comprises:

2.4.1 Stage 1 Screening (Test of Likely Significant Effect)

This stage seeks to identify any ‘Likely Significant Effects’ (LSE) of a plan or project on a National Site Network site(s), either alone or in combination with other plans or projects. A significant effect can be defined as an ‘effect that is likely to undermine the site’s conservation objectives’.

If the outcome of this stage is that no likely significant effect is identified (either alone or in combination) then no further assessment is required. This is essentially a risk assessment process that seeks to understand whether there are any mechanisms for identified impacts arising from the project to adversely affect the European site (e.g. cause-effect pathway).

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

2.4.2 Stage 2 Appropriate Assessment and the Integrity Test

Should the Stage 1 Screening identify that a plan or project could lead to likely significant effects on a National Site Network site(s), then it becomes necessary to proceed to Stage 2, which is often referred to as Appropriate Assessment (AA). AA considers whether a plan or project could adversely affect the integrity of one or more National Site Network site(s), either alone or in combination with other plans or projects. A significant effect can be defined as an ‘effect that is likely to undermine the site’s conservation objectives’.

The assessment should consider the implications of any identified impacts in view of the site’s conservation objectives and its conservation status. If the potential for Adverse Effects on Integrity (AEI) of the site are identified, this assessment should also consider measures to control the identified impacts so as to avoid adverse effects on site integrity.

2.4.3 Stage 3 Assessment of Alternatives

If adverse effects on National Site Network site(s) are predicted (or cannot be ruled out), this stage seeks to ascertain whether there are alternative solutions that would have no, or a lesser effect on the integrity of the National Site Network site(s) adversely affected by the project. If impacts cannot be fully mitigated, then the plan or project should be rejected, or the HRA taken forward to the final stage, i.e. assessment of compensatory measures where it is determined that the project or plan should proceed for Imperative Reasons of Overriding Public Interest (IROPI).

2.4.4 Stage 4 Imperative Reasons of Overriding Public Interest (IROPI)

This stage assesses compensatory measures where no alternative solutions exist and where adverse impacts remain, and it is determined whether the project or plan should proceed for Imperative Reasons of Overriding Public Interest (IROPI).

2.5 Consultation

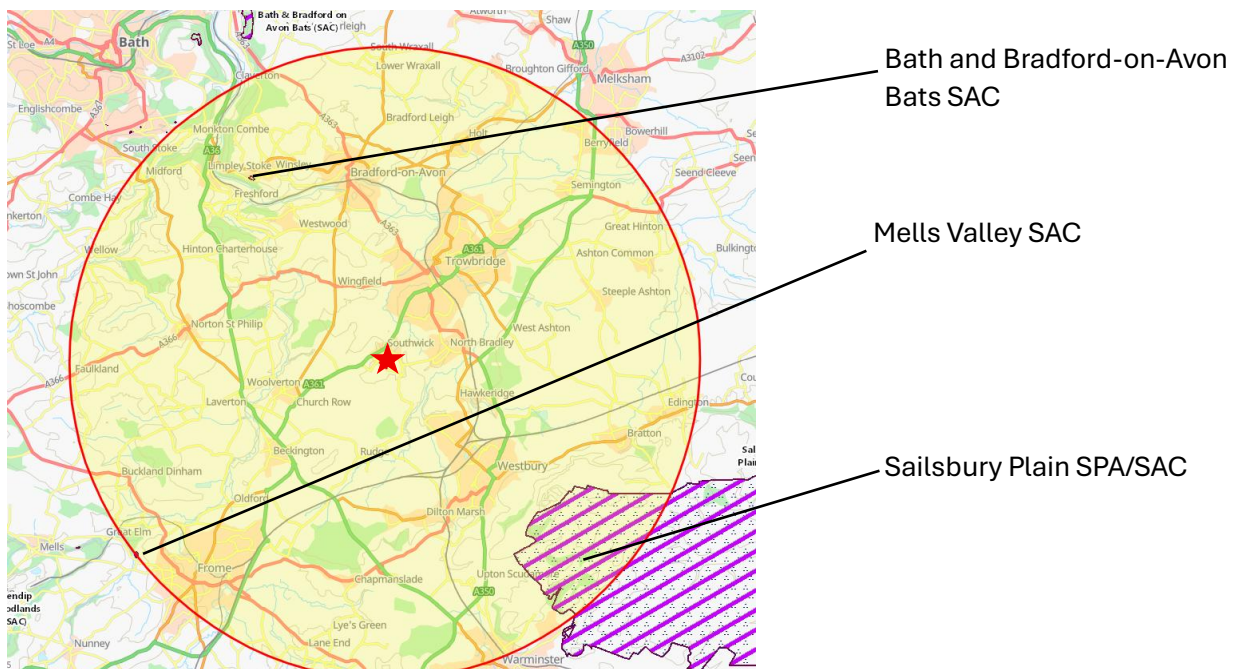
A Consultation Response was received from Kyle Conroy (Sustainable Development Senior Officer at Natural England) in August 2026. This comprised a 'Objection – Further Information Required' in regard to impacts on the Bath and Bradford on Avon Bat SAC.

3 Sites Scoped into Assessment

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

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

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



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

4 Screening Assessment

4.1 Factors Affecting NSN sites

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

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

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

4.2 Likely Significant Effect (LSE) Test

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

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

Table 1: Screening Assessment for LSEs

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

³ <https://sac.jncc.gov.uk/#>

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

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

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

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

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

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

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

5 Information for Appropriate Assessment

5.1 Bath and Bradford-on-Avon Bats SAC

The Bath and Bradford-on-Avon Bats SAC is made up of 4 component Sites of Special Scientific Interest (SSSIs):

-  Winsley Mines SSSI;
-  Brown's Folly SSSI;
-  Combe Down, Bathampton Down Mines SSSI; and
-  Box Mine SSSI.

The Site Improvement Plan⁶ for the SAC states that:

“The SAC as a whole supports 15% of the UK population of greater horseshoe bats, internationally significant populations of lesser horseshoe and Bechstein's bats. The SAC comprises four component sites: Brown's Folly, Box Mine, Winsley Mines, and Combe Down and Bathampton Down Mines. These are distributed over a wide geographical area to the south and east of Bath and have different known bat usages, which over the whole of the SAC include breeding, hibernation, swarming and dispersal. The sites are all abandoned limestone mines, and some include areas of supporting habitat: broadleaved woodland and species rich calcareous grassland. The surrounding landscape provides feeding and commuting opportunities between the component SSSIs, other SAC sites and other undesignated roosts which is vital in supporting the bats throughout their life cycle. Features of significance within the wider landscape are watercourses, woodland, grazed pasture, hay meadows, hedgerows, linear trees and scrub.”

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

Roost choice, and the presence of bats within the SAC, is likely to be influenced by the site's ability to provide bats with food and shelter. The woodland surrounding the underground mines is important for the maintenance of optimal humidity conditions inside the mine system and also as foraging areas.

Beyond this, GHS rely on the maintenance of supporting offsite habitats (functionally linked land). The provision of rich feeding areas around a roost, and the commuting routes (or flight-lines) to them, are an important element in sustaining the SAC population. Flightlines extend beyond the designated site boundary into the wider local landscape and are especially important as a link between summer and winter roost sites. GHS commute and forage along linear features, over grazed pasture and in woodland. Permanent pasture and ancient woodland linked with an abundance of tall bushy hedgerows is ideal supporting habitat for this species. GHS tend to forage within 2.5km of their summer roost, though they can travel up to 4km from these roosts to suitable foraging grounds (Schofield, 2008). In winter, their foraging range is reduced, with a mean foraging radius of 1.2 km around hibernation sites reported.

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

⁶ <https://publications.naturalengland.org.uk/publication/6279810384920576?category=5374002071601152>

Lesser Horseshoe Bats (LHS): The main population of LHS is at Box Mine SSSI, with a hibernating population of 197 (peak count – Jan 2014) (Natural England, 2019). A smaller population is present at Winsley Mine SSSI, c. 6 individuals recorded (peak count – Dec 1984) (Natural England, 2019).

As with GHS, roost choice and the presence of bats within the SAC, is likely to be influenced by the site's ability to provide bats with shelter and food (supporting habitat). LHS tend to forage within 2-3km of their roost, though they can travel up to 4km from their roosts to suitable foraging grounds. LHS commute and forage along linear features over grassland and woodland. They feed on flies (mainly midges), small moths, caddis flies, lacewings, beetles, small wasps and spiders. The species prefers sheltered valleys with extensive deciduous woods or dense scrub, close to roost sites. Where habitat is fragmented, linear features such as hedgerows are important corridors between roosts and foraging areas. During the winter, their foraging range is reduced, with a mean foraging radius of 1.2 km around hibernation sites reported. Summer and winter roosts are usually less than 5-10 km apart.

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

Bechstein's Bats: The main populations of Bechstein's bat are at Box Mine SSSI and Brown's Folly SSSI, although recorded numbers are low (Natural England, 2019). There are no records of Bechstein's bats at either Winsley Mines SSSI or Combe Down and Bathampton SSSI.

Similarly to the horseshoe bats, roost choice and the presence of bats within the SAC, is likely to be influenced by the site's ability to provide bats with shelter and food (supporting habitat). Roosts are usually tree holes during the summer and exposed sites with caves, cellars or tree holes during the winter⁷. Bechstein's bats tend to forage near to their roost sites and rarely travel more than 1.5km to find suitable foraging grounds⁸. They forage largely in enclosed vegetation such as woodland and feed mainly by gleaning flies, earwigs and moths. The species prefers damp, deciduous woodland although they may be found in parkland and coniferous woodland. Where habitat is fragmented, linear features such as hedgerows are important corridors between roosts and foraging areas.

Bechstein's bats are vulnerable to the loss or disturbance of suitable habitat, e.g. by removal of dead/dying trees, habitat fragmentation and drainage of wet woodlands.

The SIP states that the main pressures and threats are:

- 👉 Planning permission - loss of foraging habitat, loss of minor roost sites, and disruption of flightpaths (the latter particularly through light pollution).
- 👉 Change in land management – loss of foraging habitat through inappropriate management in terms of bats.
- 👉 Direct impact from third party – vandalism and impacts of recreational activities.
- 👉 Feature location/ extent/ condition unknown (Bechstein's bat only) – lack of knowledge regarding location and extent of Bechstein's bats.
- 👉 Offsite habitat availability/ management – use of surrounding habitats.
- 👉 Public access/ disturbance – damage disturbance from public access.
- 👉 Change to site conditions – Unstable mines at risk of collapse may no longer be used by bats.
- 👉 Inappropriate designation boundary – new sites being considered for designation.

5.1.1 Bath and Bradford-on-Avon Bat SAC Planning Guidance for Wiltshire

Wiltshire Council and Natural England jointly published the guidance document assist applicants on how development activities can affect Wiltshire's bat SACs and what must be done to avoid or mitigate

⁷ <https://www.bio.bris.ac.uk/research/bats/britishbats/batpages/bechsteins.htm>

⁸ <https://cdn.bats.org.uk/uploads/pdf/Bechsteins-bat-species-account.pdf?v=1642079639>

any impacts. It aims to flag up the types and locations of development that present risks to the SACs so that the needs of bats can be taken into consideration as early as possible in order to avoid unnecessary delays to development projects.

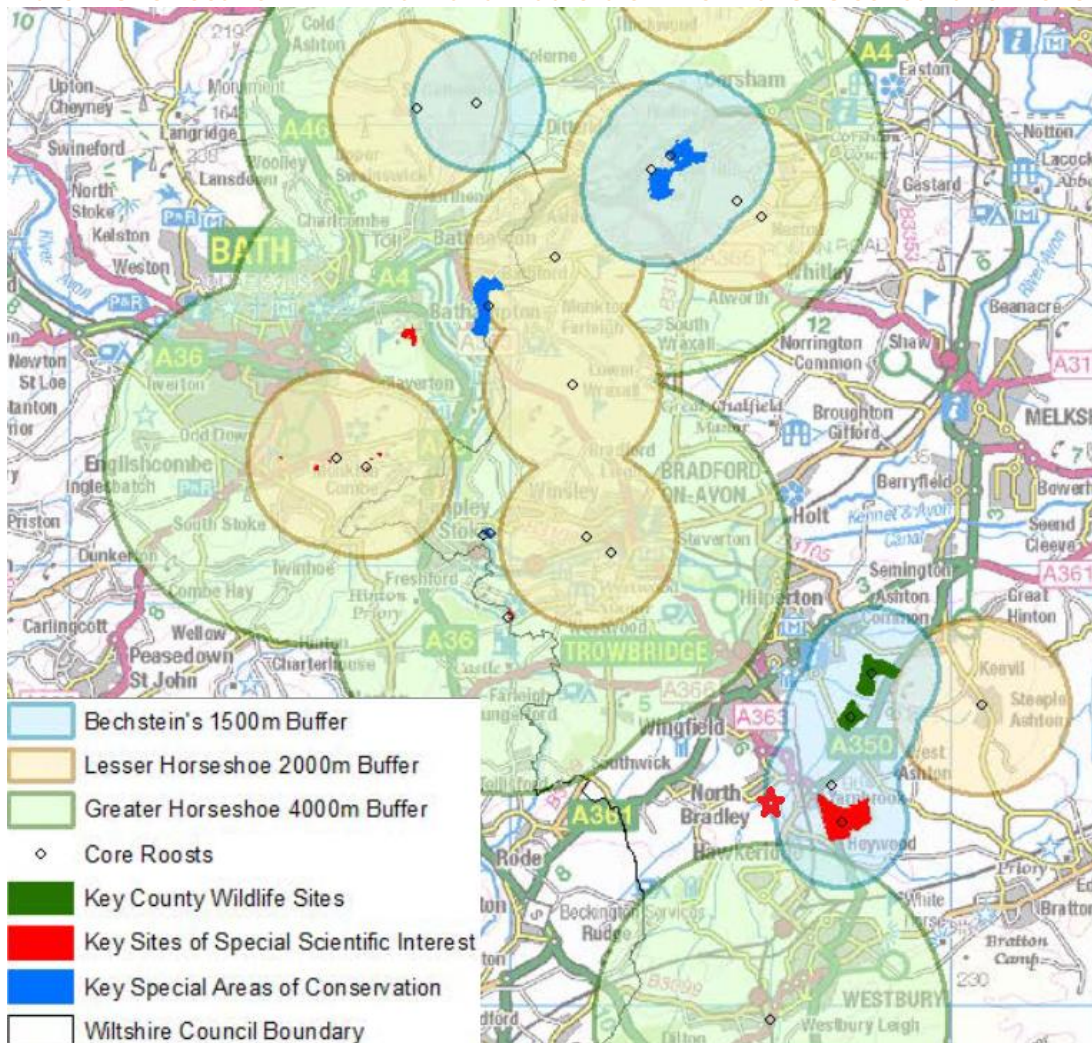
The guidance provides a required survey scope when Sites are located within Consultation Zones around Core Roosts associated with the SAC, and provides a list of potential impacts that should be considered, which are as follows:

- Physical changes – alteration / demolition / removal of a potential roost feature including environmental conditions (temperature, humidity, internal light levels etc), loss, damage or change of management of potential foraging habitat, removal / fragmentation / modification of habitats in a potential commuting corridor;
- Lighting – artificial lighting close to potential roosting, foraging and commuting features;
- Noise and vibration – construction / demolition activities close to potential roost features;
- Recreational disturbance – increasing the risk of recreational visits both organised and informal
- Pollution – dust and fumes close to potential roost features; and
- Mortality – predation by domestic cats at roost entrances, collision risk from wind turbines.

These broad impacts are informed by the pressures and threats from the Site Improvement Plan for the SAC (NE, 2015b), as outlined above.

The Site is located within the 1500m buffer for Bechstein's bats from Green Lane and Biss Woods Local Wildlife Site (LWS) see **Plate 2** below. The Site lies outside the Consultation Zones for the other two SAC Species, GHS and LHS.

Plate 2: Site Location within Bath and Bradford on Avon Bat SAC consultation zone

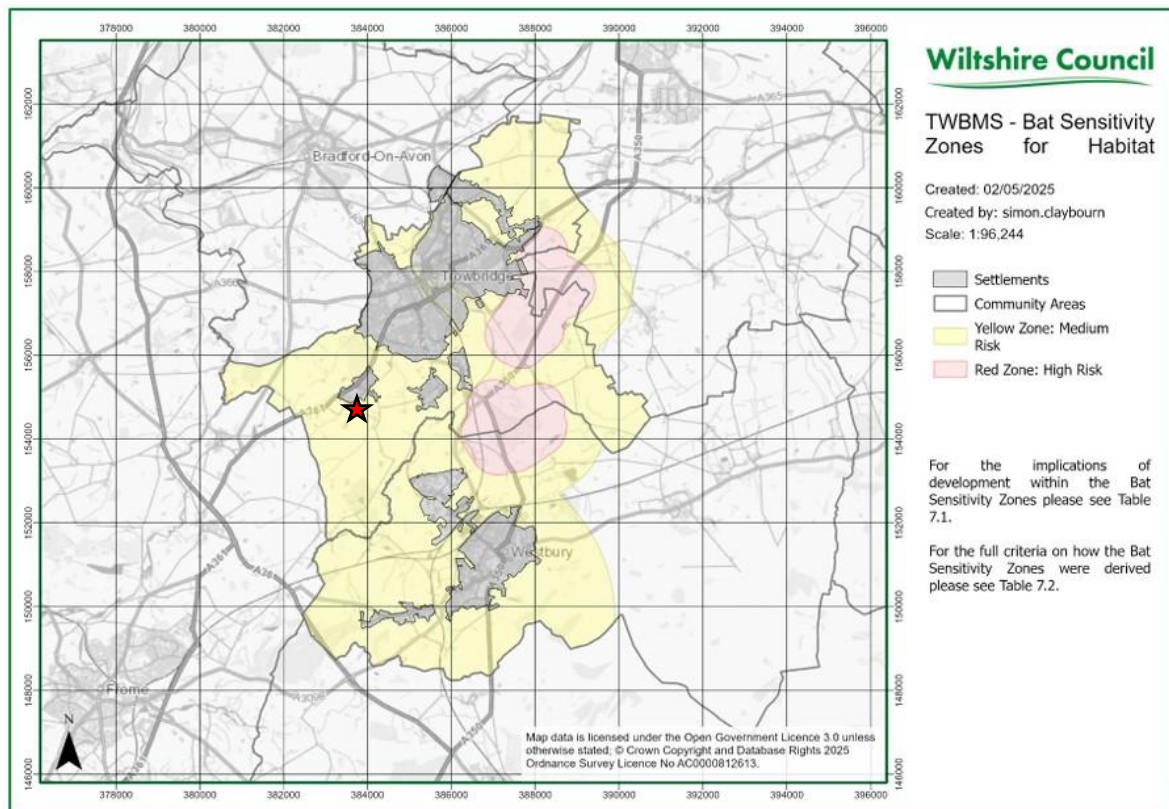


5.1.2 Trowbridge and Westbury Bat Mitigation Strategy (TWBMS)

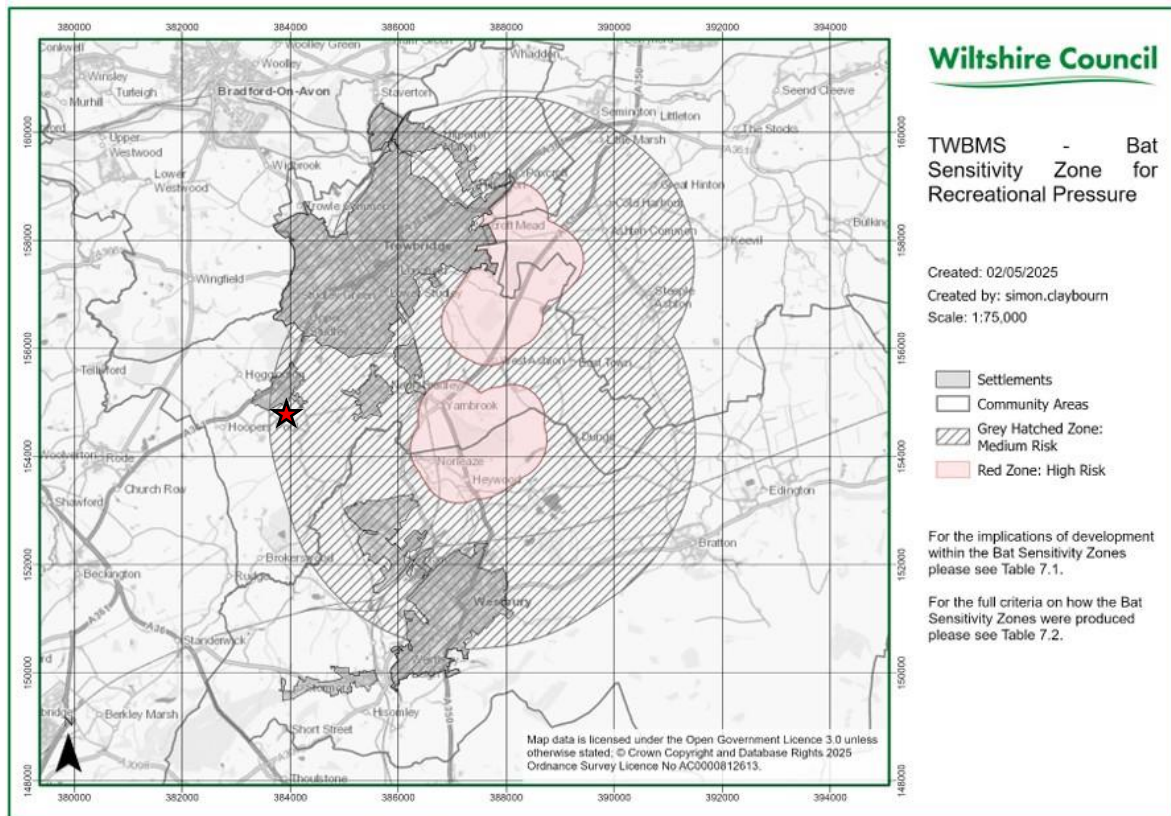
Wiltshire Council published the TWBMS in July 2025 intended to provide a clear and detailed approach to considering the impact of development in the Trowbridge and Westbury area on the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC). This will help inform strategic planning for the area's future housing needs. This document builds upon the previous iteration – The Trowbridge Bat Mitigation Strategy (Wiltshire Council, 2020) and has been produced in support of the Wiltshire Local Plan Review 2020-2038. The document builds upon the guidance as outlined in the Bath and Bradford-on-Avon Bat SAC Planning Guidance for Wiltshire (Wiltshire Council, 2015), though is tailored towards proposals within and around the settlements of Trowbridge and Westbury. In their announcement of the TWBMS⁹ WC stated that the document would “...bring the new strategy in line with the council's other mitigation strategies pertaining to European sites, it will not comprise a Supplementary Planning Document (SPD) and this has been agreed with Natural England”, and that the purpose was to allow flexibility so the strategy can be updated/amended when required.

The TWBMS outlines a series of Bat Sensitivity Zones have been developed with regards to habitat suitability and recreational pressures and have been drawn around key maternity roosts. The Site lies within the Yellow Medium Risk Sensitivity Zone (areas where habitat has been shown to be of importance or is highly likely to be of importance for SAC bats) and the Grey Hatched Medium Recreational Risk Zone (areas where new residential development is expected to result in increased recreational pressure on key woodland bat sites) – **Plate 3** refers.

Plate 3: Site Location within TWBMS Zones



⁹ <https://www.wiltshire.gov.uk/article/14112/New-strategy-in-place-to-protect-bat-habitats-from-potential-development-in-Trowbridge-and-Westbury>



Developments within the Yellow Zone must mitigate for all impacts on target bat species on site, and should expect to make a payment for strategic habitat mitigation.

Developments within the Grey Hatched Zone of less than 50 dwellings should expect to make a payment for recreational mitigation; and proposals of 50 or more dwellings within this zone will generally be expected to provide a Suitable Alternative Natural Greenspace (SANG) / sufficient natural recreational focused greenspace to ensure that new residents do not impact upon the important woodland sites.

In respect of all the zones, development proposals will be assessed on a case-by-case basis by the council's ecology team.

As with the aforementioned documents, the TWBMS provides detail on what could result in impacts upon the SAC:

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

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

- 🦉 *Mortality – e.g. predation by domestic cats at roost entrances, collision risk from road traffic and wind turbines.*

Wiltshire Council formally withdrew its emerging Local Plan (2020–2038) from examination on 19 May 2026 after government inspectors concluded it failed to allocate sufficient land to meet the county's housing and affordable housing needs, as well as concerns raised regarding the spatial strategy proposed. As such, the legal weight afforded to the TWBMS is somewhat untested. As confirmed via correspondence with Wiltshire Council, unlike the TBMS, the TWBMS does not represent a Supplementary Planning Document (SPD). However, WC has stated that “The TWBMS remains in place irrespective of the withdrawal of the Wiltshire Local Plan 2020-2038 from examination. It will continue to provide the detailed approach for addressing and mitigating the impacts of development in the Trowbridge and Westbury areas on the Bath and Bradford-on-Avon Bats SAC. As with the TBMS, the revised strategy has been prepared to support both the Wiltshire Local Plan and speculative growth. As a result, the TWBMS remains both relevant and appropriate.”

It should be noted that there is some minor discrepancy between the TWBMS Adoption Statement (22 July 2025) and the published TWBMS. Para 21 of the TWBMS Adoption Statement states “A main change put forward in the TWBMS is that new residential development proposals for 50 or more dwellings within the grey hatched medium recreational risk zone will generally be expected to provide a SANG / sufficient natural recreational focused greenspace, or to financially contribute towards a SANG / sufficient greenspace in close proximity to the development site, to minimise intercept new residents and minimise impact upon the important woodland sites. A monitoring fee will also need to be secured via a planning obligation to monitor use of the SANG / greenspace once the development is occupied”. There is some discrepancy between this adoption document and the version of TWBMS within the public domain and it is suggested that there should be flexibility to provide either SANG on-site or a financial contribution, as many other local authorities do.

5.2 Mells Valley SAC

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

The component sites for the Mells Valley SAC are:

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

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

Caves not open to the public: Caves not open to the public is interpreted as referring to natural caves which are not routinely exploited for tourism, and which host specialist or endemic cave species or support important populations of Annex II species. The Site Improvement Plan identifies public access/disturbance as a pressures and/or threats to this feature¹⁰.

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

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

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

5.3 Use of the Proposed Development Site by Bats

5.3.1 Foraging and Commuting

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

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

The automated detector surveys recorded greater horseshoe (0.53%; 126 passes) at all Locations, with Lesser Horseshoe (0.28%; 67 passes) also recorded throughout the Site. Greater horseshoe bats showed the highest affinity to Location 2 and lesser horseshoe passes were recorded the most frequently at Location 3. This showed that the peak activity was recorded along the southern and eastern boundary.

Myotis bats (including Annex II Bechstein's for which the SAC is in part designated) account for 2.86% of total calls (679 passes). *Myotis* sp (potential including Annex II Bechsteins) were recorded in every month of the survey and were recorded most frequently along the northwestern boundary, with an average of 6 passes per night.

The assemblage of bats recorded during these surveys is considered to be fairly typical given the Site's geographic location and the habitats on and adjacent to the Site. Overall bat activity was dominated by pipistrelle bats (c. 90% of all passes) and, with all other species combined accounting for <10% of the total recorded activity with GHS and LHS representing 0.53% and 0.28% of total calls. Due to the difficulty in identifying *Myotis* bats to species level, they have been grouped together. They account for a cumulative 2.86% of total calls, a modest number considering that Annex II Bechstein's will likely account for a proportion of that total. More common *Myotis* species (Natterer's and Daubenton's) and the more uncommon species (whiskered, Alcaho, Brandt's), likely make up a larger proportion.

¹⁰ <https://publications.naturalengland.org.uk/publication/4665580590202880>

The activity surveys undertaken found that the Site habitats offer a resource for a variety of species including Annex II bats that are associated with the SAC. However, taking into consideration the modest scale of the Site, its context in the landscape, its proximity to the SAC and the assemblage, and numbers of bats identified, there is no evidence to suggest the Site or its boundaries represent a significant/landscape commuting corridor for any of these species.

5.3.2 Roosting

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

5.4 Identification of Potential Impact Pathways and Counteracting Measures

5.4.1 Bath and Bradford-on-Avon Bats SAC

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

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

5.4.2 Mells Valley SAC

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

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

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

5.4.3 Habitat Loss/Fragmentation

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

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

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

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

The Statutory Biodiversity Metric has confirmed that no net loss of habitat is to occur within the Site boundary (Ref: 2102-BNG-AG-V3 and 2102-SBM-AG-V3). This is being achieved by the creation of other neutral grassland, orchard, mixed scrub, modified grassland, individual trees, native hedgerow and species-rich hedgerow planting. The landscaping proposed will provide suitable foraging habitat and strengthen the already existing corridors through the Site.

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

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

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

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

5.4.4 Loss of Roosting Habitat

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

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

A tree within H2 (T18) was identified as having potential for roosting bats during the walkover survey undertaken in January 2024 and updated in January 2025. This tree was removed without ecology

supervision in November 2025 due to health and safety concerns around ash dieback and the proximity of an overhead cable. However, due to the context of this tree (being within a hedgerow and not within or connected to a woodland), it is not considered to have potential for roosting Bechstein's bats. Whilst there will be a change in habitat surrounding trees with roosting potential, the impact of this is considered to be minimal providing adequate buffers are provided in-line with the above measures and adhered to. It can therefore be concluded **there will be no AEOL to the GHS, LHS or Bechstein's bat populations associated with the Bath and Bradford-on-Avon Bats SAC as a result of impacts to roosting habitats.**

5.4.5 Loss/Disruption of Foraging/Commuting Habitat through Lighting

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

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

A Lighting Strategy (WLC Lighting Design, 2026) has been developed in accordance with the ILP Guidance Note 08/23 Bats and Artificial Lighting at Night and the TWBMS (Wiltshire Council, 2025). Whilst a certain level of lighting throughout the Site is necessary for the health and safety of future residents, the strategy includes measures to reduce the impact of this lighting on local fauna including the identification of sensitive zones to ensure darker areas are maintained/created to protect important commuting and foraging routes. Lighting within these areas will be kept to an absolute minimum.

The lux levels within the Zone A new core bat habitat will be completely unlit and subject to no light-spill (WLC Lighting Design, 2026) and therefore achieving the less than 0.2 on the horizontal plane and less than 0.4 on the vertical plane as required by the TWBMS (Wiltshire Council, 2025). The Zone B dark buffer zone will have light levels below 1 lux. Hedgerow H5 will be subject to minimal light-spill in areas of up to 1 lux. Brighter lighting within the centre of the Site, associated with houses, parking spaces and primary footpaths will be directional with no upward spill.

As demonstrated within the Lighting Design (ref: WLC1460-1300-001) an area greater than the 15m/10m Zones A or B will be unlit along the east and southern boundaries of the Site (**Figure 1** refers) with the zone extending up to 55m at it's widest point.

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

5.4.6 Impacts During the Construction Phase

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

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

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

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

5.4.7 Recreational Pressures

The TWBMS highlights the potential for increased recreational pressures on woodlands which support bats associated with the Bath and Bradford on Avon Bat SAC. As such a Zol has been developed around these roosts (the Grey Hatched Zone) within which, new residential development is expected to result in increased recreational pressure (and therefore adverse effects) on key woodland bat sites. The TWBMS requires that *“New residential development proposals for 50 or more houses within this zone will be expected to provide mitigation in the form of SANG / sufficient natural recreational focused greenspace; and new residential development proposals for less than 50 dwellings within this zone will be expected to make a financial contribution towards the delivery of strategic mitigation to address recreational pressure on the woodland sites”*. Suitable Alternative Natural Greenspaces (SANGs) is the term given to greenspaces that are created or enhanced with the specific purpose of absorbing recreation pressure that would otherwise occur at designated nature conservation site, particularly European wildlife sites. SANGs are created, or existing greenspaces enhanced to create a SANG, in order to mitigate for the effects of new housing development, absorbing the level of additional recreation pressure associated with the new development. It is understood that this is in addition to the contributions being sought for ‘strategic’ bat habitat mitigation within the 'Yellow Zone', to mitigate for the loss of bat habitat, as opposed to recreational pressure.

SANG originally derives from Natural England's *Suitable Alternative Natural Greenspace (SANG) Guidance* (August 2021) which provides a recognised framework for delivering alternative greenspace that seeks to divert recreational pressure from protected sites and was written in relation to the Thames Basin Heaths Planning Zone. The TWBMS (and the TBMS prior to this) was drafted based upon visitor survey information collected by Footprint Ecology in 2018 as published in the Trowbridge Recreation Strategy and Visitor Surveys (Panter, C., Lake, S. & Liley D. 2018).

The 50-dwelling threshold for when schemes are required to provide *“SANG / sufficient natural recreational focused greenspace”* as referred to in the TWBMS seems to derive from work produced by Footprint Ecology, who themselves conducted work on behalf of WC as discussed above. A literature review of similar such documents produced by Footprint Ecology indicates that this derives originally from the Thames Basin Heaths Delivery Framework (Joint Strategic Partnership Board, 2008) which sets out that applications for large scale development **beyond the zone of influence**¹¹ should be assessed on an individual basis. This follows from the advice of the technical assessor (Burley, 2007) who recommended that residential developments of 50 or more dwellings within 5-7km should be assessed and **may** be required to provide mitigation¹². The document recommends that such cases be considered on a **case-by-case basis**. Further review of Burley 2007 indicates that there was significant discussion

¹¹ The 5km Zol identified by the TBH SPA Delivery Framework

¹² <https://www.bracknell-forest.gov.uk/sites/default/files/2021-08/thames-basin-heaths-spa-delivery-framework.pdf>

between stakeholders (The Joint Strategic Partnership Board) on what would constitute a ‘small site’ however this discussion was around at what threshold would Sites be considered to have an impact and at which distance and as such should provide a contribution to strategic mitigation. As such, it’s inclusion in other documents dealing with strategic mitigation appears to represent an arbitrary number and not be based on evidence regarding significance of impacts.

As Footprint Ecology specialise in visitor surveys, recreational mitigation schemes and Habitats Regulations Assessments of Local Plans, this number appears to have proliferated throughout the wider literature. Most similar strategic mitigation schemes have been written in such a way to provide flexibility and not to introduce an artificial barrier to development proposals (i.e. by providing the option to provide bespoke SANG on site where possible, or to contribute SANG/SAMM payments to the LPA as part of a strategic scheme).

In the previous version of the document (the TBMS) (an adopted SPD), the requirement was in line with this trend. New residential development would be able to demonstrate no adverse effect on site integrity of the SAC provided that funding being collected via CIL towards the LPA scheme for SANG/SAMM for mitigating residual in-combination effects from recreational pressure (which contribute toward a new 38ha SANG and hence reflect a maximum worst-case scenario).

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

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

In March 2025, Wiltshire Council and Natural England published a Statement of Common Ground as part of Wiltshire Council’s Local Plan Review¹³. Within it stated “3.53 - *At North Trowbridge there is a proposal for a Country Park (Policy 54), functioning as SANG, to ensure that the planned growth within the plan period will seek to avoid harm to the Bechstein's bat maternity colonies in Green Lane and Biss Woods to the south-east of the town, which are functionally linked to the Bath and Bradford-on-Avon Bats SAC. Natural England offered support for the proposed North Trowbridge County Park as set out in Policy 54 of the draft Wiltshire Local Plan at the Regulation 19 stage. Natural England are aware of ongoing discussions with regards the delivery of this SANG and are working with the Council and landowners in bringing forward a deliverable scheme of suitable scale alongside the potential for a phased approach. Any outcome will need to mitigate impacts upon the aforementioned bat species / habitats with any agreed phasing / amendments needing to be agreed by Natural England to maintain a sufficient level of mitigation. Natural England can confirm that the most recent SANG masterplan as set out by the promoter will secure a suitable level and layout of SANG relative to the allocation at Policy 54 and appropriate landscaping will further enhance the foraging opportunities for Bechstein’s bats across the SANG*”.

A review of the Trowbridge Recreation Strategy and Visitor Surveys (Panter, C., Lake, S. & Liley D. 2018) makes it clear that there “*is insufficient information to identify particular thresholds of access, activities*

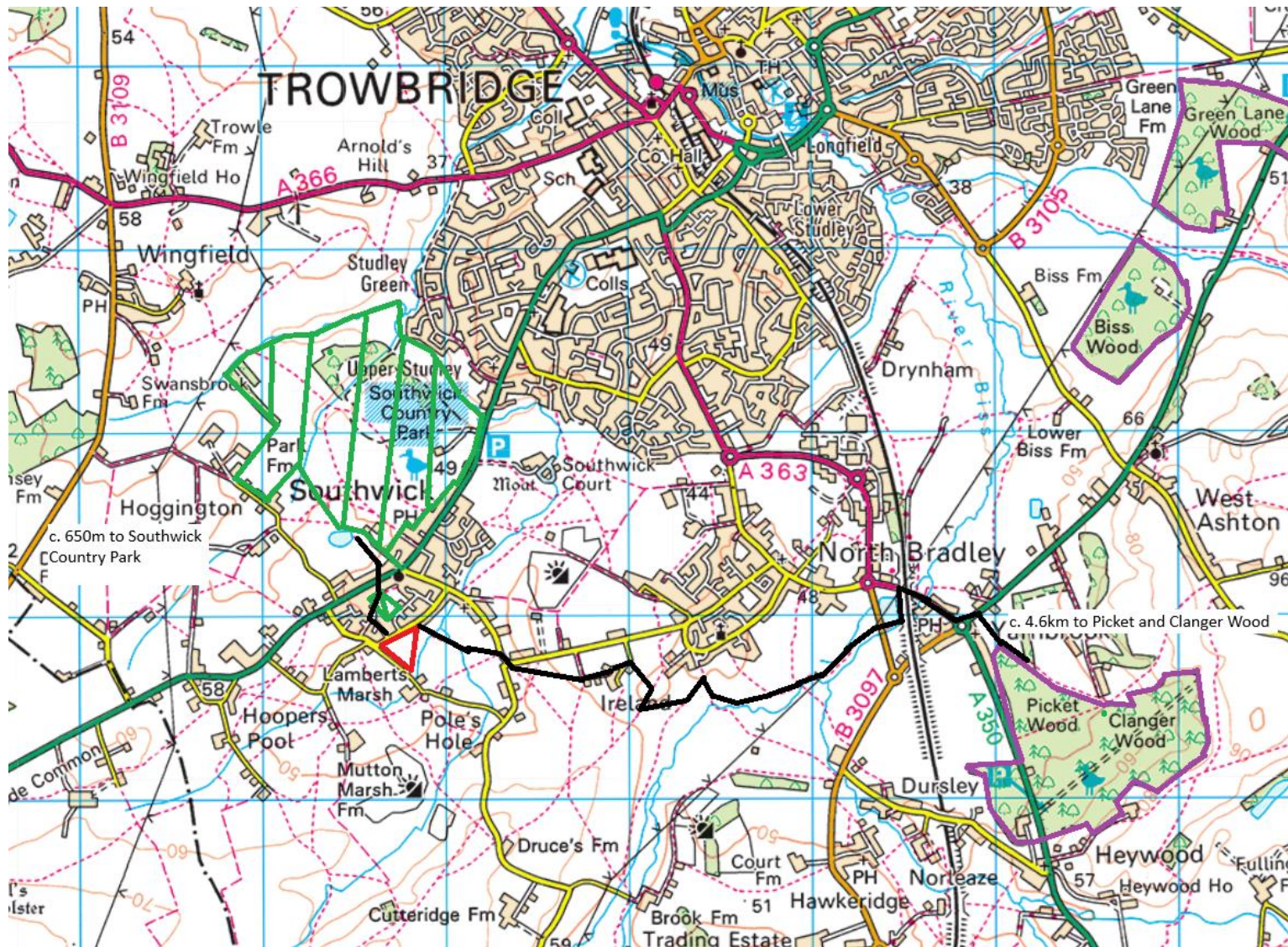
¹³ https://www.localplanservices.co.uk/files/ugd/017f5b_910bb5add65e49f2adb49c9f0166007a.pdf

that should be singled out or levels of development at which impacts occur, however the review does highlight risks for Bechstein's Bat. These risks relate to the overall pressure on the woodland sites, which are themselves relatively fragmented. These pressures will grow with increased levels of development". It also found that "...Estimates of total visitor numbers to sites highlight that the bat woodland sites are relatively quiet (up to 0.2 per ha per hour), and Biss Wood was particularly quiet (0.02 people per ha per hour). The other greenspace sites were much busier, for example Southwick Country Park was estimated to have 0.44 people per ha per hour and Biss Meadows and Paxcroft Mead around 0.9 people per ha per hr". Further to this roughly "two thirds (65%) of interviewees arrived at sites on foot". With Clanger and Picket Wood and Southwick Country Park (main car park) were the locations with high proportions of interviewees arriving by car.

While on average, the distance between the home postcode of interviewees and the survey point where interviewed was 2.5km, but half of all postcodes were within a 700m radius and three quarters within in a 1.8 km radius, visit rates (i.e. number of interviewees per household) show that the woodland sites draw visitors on foot from a radius of around 600m, beyond this distance visit rates are low and constant.

This is key in seeking to assess potential quantum of impact as through liaison in June 2026, WC stated *"...Where the SANG criteria are not met, applicants must provide robust justification demonstrating how recreational impacts will be appropriately mitigated to ensure no adverse effect on the Bath and Bradford Special Area of Conservation"* and that the scheme should seek to demonstrate that the site wouldn't contribute to recreational pressure via showing how new residents might use or access other areas rather than the SAC, looking at other footpaths in the locality, commenting on barriers to access etc. As such, **Plate 4** below seeks to show existing open space, public rights of way, areas of restricted access and other such factors (i.e. barriers etc) within the Site's locality.

Plate 4: Open Space and Access within the Locality



Site boundary delineated by **Red Line**. Public Rights of Way delineated by **Pink Lines** (Solid/Dashed/Dotted). **Orange Area** delineates existing Public Open Space/Open Access Land under CROW Act 2000. **Purple Area** delineates Important Bat Woodlands. **Black Line** shows shortest PROW routes to Southwick CP and nearest Bat Woodland

As shown above, the Site is well connected to the PRoW network via SWCK14 which bounds the Site to the east. This provides links to the north to Blind Lane, other PRoWs and Southwick Country Park c. 500m as the crow flies, and c. 650m via PRoWs and residential roads. Other links via public highway and PRoW provide extensive opportunities to the south, west and east.

When considering potential access to Picket and Clanger Wood (the nearest sensitive woodland), the shortest distance via PRoW and public highway (with pavement) is via SWCK15 to Bradley Lane, then SWCK10 to Ireland, then NBRA51, NBRA24 to NBRA22/23 to NBRA21/18/19/17 to Yarnbrook, and then using WASH19 to Kettle Lane Farm. A c. 4.7km walk. As outlined in Trowbridge Visitor Survey c. 65% of respondents had arrived via foot, with three quarters of respondents from within a 1.8km radius. Furthermore, visit rates (i.e. number of interviewees per household) show that the woodland sites draw visitors on foot from a radius of around 600m, beyond this distance visit rates are low and constant. As such, the majority of new residents can be anticipated to utilise POS (both formal and informal within the scheme and in the locality) within closer proximity to their residence than the closest of the sensitive woodlands, and there are ample alternative opportunities for recreation other than the SAC.

Footprint Ecology assessment recognises that that there is “...very little work directly addressing the impacts of disturbance on woodland bats. However, a simulation model of possible impacts on *Barbastelle Bats* (a rare breeding woodland species which switches roosts following disturbance by a predator/perceived predator) concluded that the greatest risk of disturbance was from unrestricted recreationists (i.e. those wandering off the paths) and that the risk of disturbance was greater closer to car parks (Bennet et al. 2009)”. While it is valid to extrapolate from one type of woodland specialist bat to another (Barbastelle to Bechstein’s) the journal article does state “From the results of the simulation runs, anthropogenic disturbance does not appear to be negatively influencing barbastelle bat breeding success”, and that “simulation suggests that anthropogenic disturbance of the barbastelle bat is not preventing the females from establishing maternity roosts in Chedworth Wood...” and “...factors other than human disturbance may be influencing the use of the potentially suitable roost trees within the wood”.

As such, the conclusions of the article are not as clear-cut as is otherwise suggested within the Footprint Report, and this is before considering that “wildlife individuals may have differing tolerances for interactions with recreationists (Vaske et al., 1995), especially considering the existing and long-term uses of the Green Lane and Biss Woods specifically for recreational purposes (as Wiltshire Wildlife Trust Reserves) and the active management by the WWT (i.e. the Site seeks to deter/prevent unrestricted access), including through a new Ecological Centre on the reserve, which includes a full time warden and part time education officer and will be funded in the long-term via s106 contributions. The WWT stated¹⁴ “We acknowledge that increased footfall requires extra management of the site. With the additional resource, we will intensify our monitoring of the reserve’s important wildlife, and the overall condition of the woodland. Our highest priority is protecting sensitive species like the Bechstein’s bat. The presence of the dedicated Warden and the centre will be key to actively deterring disturbance, vandalism, and fires, safeguarding this locally rare species from any adverse effects of the new proximity to development.”

Sufficient consideration should be given to the Site’s proximity to Southwick Country Park as outlined above which provides extensive appointees for recreation. It should be noted that the Country Park was created with the aim of attracting visitors away from the three sensitive woodlands.

¹⁴ <https://www.wiltshirewildlife.org/blog/statement-green-lane-woods-ecological-centre>

NE's SANG design standards requires SANGs to be in the order of 30ha in size, with a further recommendation of 8 hectares of open greenspace per 1,000 new residents / people as detailed in guidelines on SANG creation, which is based on the average of 2.4 people per household. Based on the number of dwellings proposed via this application (), this results in an average occupancy level of 216 residents. If one were to utilise the guidance therefore, the scheme should require c. 1.728ha of SANG or 'sufficient natural recreational focused greenspace'.

The scheme proposals themselves include significant areas of accessible public green space which will be created as part of the development totalling c. 1.6431ha of formal and informal open space across the entire site, including c.0.821ha of other neutral grassland, 0.457ha of modified grassland, 0.0256ha of mixed scrub, 0.087ha of traditional orchard, 0.0322 of rain garden and 0.0396 of introduced shrub. The provision of these areas will provide new and existing residents in the local area with new opportunities for dog walking and recreation in combination with providing ecological mitigation and enhancement for Annex II bat species, and as discussed above provides links out to the wider countryside (including Southwick Country Park) for walking purposes. It is proposed that this greenspace should be delivered prior to first occupation of the development.

As outlined above the scheme should require c. 1.728ha of SANG or 'sufficient natural recreational focused greenspace'. The total site area is only 4.34ha in extent, so this figure accounts for 39.8% of the total site area. Whilst the scheme will include extensive areas of greenspace (both for wildlife and for recreational uses), the 1.6431ha provided is under the target of 1.728ha. However, the onsite provision coupled with the above site context ((i.e. proximity to Southwick Country Park and other recreational opportunities within the locality, and distance to the sensitive woodland sites, **it is considered that an AEOL on the conservation status of GHS, LHS or Bechstein's bats for which the SAC is designated as a result of the an increase in recreational pressures is unlikely.**

The applicant would be willing to agree a further financial contribution to Wiltshire Council via s106/s111/UU to account for any shortfall.

5.4.8 Natural England Comments

As outlined above, in August 2026, consultation comments were received from Natural England. These **comments (NE)**, along with **responses (GE)** are discussed below.

Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC) – Objection Further Information Required

The application site lies within an area known to support bats that form part of the populations for which the Bath and Bradford-on-Avon Bats SAC is notified and therefore has the potential to affect its interest features. European sites are afforded protection under the Conservation of Habitats and Species Regulations 2017, as amended (the 'Habitats Regulations'). In considering the European site interest, Natural England advises that you, as a competent authority under the provisions of the Habitats Regulations, should have regard for any potential impacts that a plan or project may have. The Conservation objectives for each European site explain how the site should be restored and/or maintained and may be helpful in assessing potential impacts. On the basis of information provided, Natural England's advice is that this proposed development will require mitigation measures intended to avoid or reduce the likely harmful effects on a European site which cannot be taken into account when determining whether or not a plan or project is likely to have a significant effect on a site and requires an appropriate assessment (following the People Over Wind ruling by the Court of Justice of the European Union). For this reason, the proposed mitigation measures need to be formally checked and confirmed by your Authority, as the competent authority, via an Appropriate Assessment.

Habitats Regulations Assessment – Appropriate Assessment

Natural England notes that the Habitats Regulations Assessment (HRA) has not been produced by your authority, but by the applicant. As competent authority, it is your responsibility to produce the HRA and be accountable for its conclusions. Natural England is a statutory consultee at the Appropriate Assessment stage of the Habitats Regulations Assessment process. The following advice is provided to support the conclusions drawn and to assist your authority to undertake an Appropriate Assessment:

As stated in the aims of this reporting, this sHRA will provide the necessary detail for WC to carry out their duty as the Competent Authority as per the Habitats Regulations 2017. WC can either use this document to inform their own Habitats Regulations Assessment or can choose to adopt this document and its findings.

Bat Activity

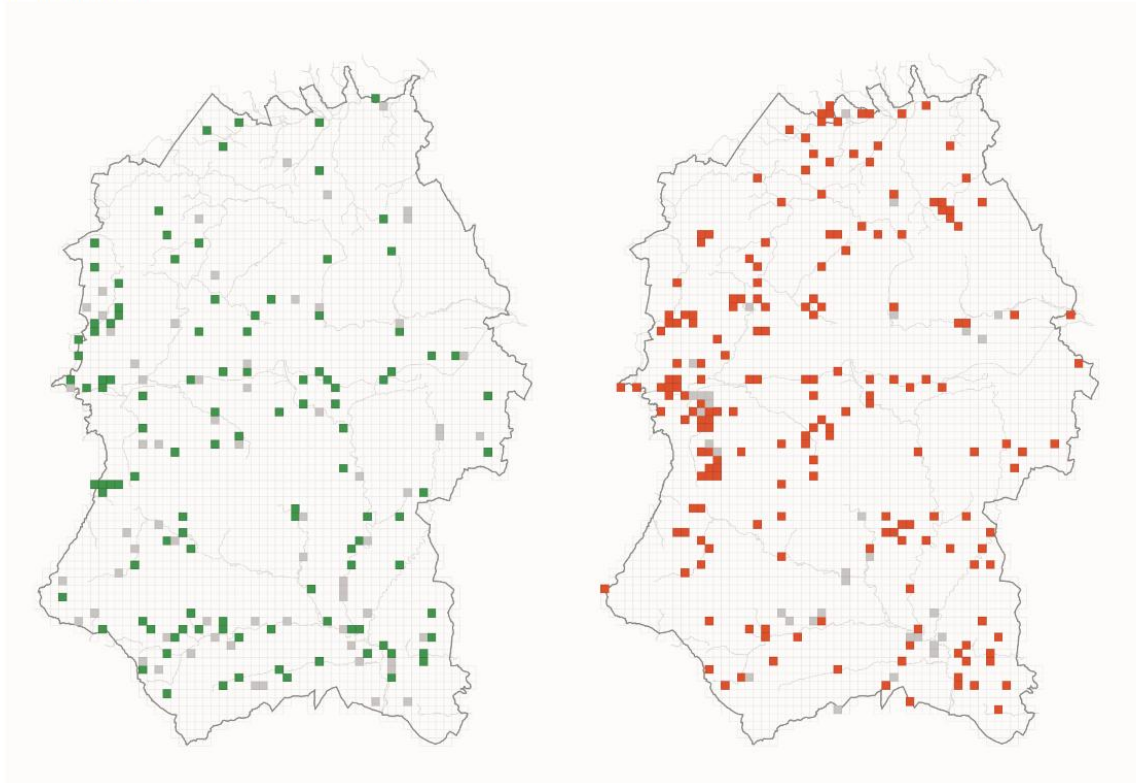
The submitted ecological survey results demonstrate that the site is used by at least 9 bat species, including Annex II species (Greater horseshoe bat, Lesser horseshoe bat and Barbastelle). Bechstein's bat is assumed to be present on site. The site is also used by bat species considered threatened in the UK (i.e. Serotine). Although occurring in low numbers the number of species present is significant therefore it is important to ensure the scheme maintains and enhances commuting and foraging opportunities for bats.

NE comments overstate the value and significance of the Site. While they are correct that at least 9 species are present, the same would be expected of any similar such peri-urban site across Wiltshire, or southern England would support a similar such assemblage of bats.

Further to this the comment makes no reference to the abundance of particular species. For reference over 90% of all calls can be attributed to common (21148 passes / 162.6 passes per night) and soprano pipistrelle (312 passes / 2.3 passes per night) (the UK's two most abundant species). In terms of rarer species Serotine (590 passes / 4.5 passes per night) and *Myotis* species (679 passes / 5.1 passes per night), which are considered to be more light averse, were recorded at all locations across the Site. While certainly less abundant, these only represent c. 2.5% of all passes.

It should be noted that while Serotine are nationally uncommon, with their natural range comprising southern and central England. There is some evidence to suggest they are declining in the east of England, however there is some evidence from bat workers, as well as from population genetics, of a westward expansion of the population, possibly corresponding with a decline in the east (Moussy and others 2015). Wiltshire is located centrally within the natural range for serotine within the UK, with the Wiltshire Bat Atlas suggesting that the species is widespread across Wiltshire but is not considered abundant. I've included the distribution maps from the Wiltshire Mammal Atlas below (data up to 2017).

Figure 2.38: Serotine bat



In terms of the rarest species there were 8 registrations for Barbastelle (an average of 0.1 passes per night), 126 for greater horseshoe (0.9 passes per night) and 67 for lesser horseshoe (0.5 passes per night). These represent modest numbers of bats when compared with other sites that GE have surveyed (or we are aware of) around Trowbridge/West Wiltshire

Bat Mitigation

Natural England welcomes that the scheme is to retain the majority of hedgerows and trees with bat roost features. We also note that these retained habitats are to be enhanced and that a Habitat Mitigation and Monitoring Plan is to be produced. The long term management of retained habitats should focus on benefitting the local bat population, notably Annex II species for which the Bath and Bradford on Avon Bats SAC is notified. As noted above, the bat survey results demonstrate that Annex II species linked to the Bath and Bradford on Avon Bats SAC are present on site and the site is located within the yellow medium risk zone of the TWBMS. It is therefore advised that the scheme adheres to the TWBMS guidance in relation to core bat habitat buffers and light spill. In order to adhere to the TWBMS, core bat habitat should be buffered by 15m of new core bat habitat and a further 15m dark buffer zone. The aim of this is to ensure that the core bat habitat is adequately buffered from the urban fringe to maintain and enhance the functionality of the existing ecological corridors. Your Authority should be satisfied that the proposed buffers meet the TWBMS guidance. It is noted that the watercourse along the southeastern boundary is proposed to be buffered by 15m of new core bat habitat (zone A) and 10m of dark buffer (zone B). Any deviation from the TWBMS guidance should clearly demonstrate how it is to the benefit of the local bat population. The site is considered important for providing commuting and foraging resource for a variety of bat species, including Annex II species. Given the location and on-site habitats it is unsurprising to understand that survey results show bats using boundary features for commuting and foraging with more bat activity observed along the southeastern watercourse and hedgerow. These ecological features are considered core bat habitat and should be appropriately buffered from any development, as previously mentioned. The scheme should also ensure that commuting routes between foraging areas and known commuting corridors are retained and enhanced. To increase the sites capacity to provide foraging opportunities for bats, the proposals

may include various enhancement measures such as the planting of fruit trees or wildflower planting. The SuDS should also be designed to hold permanent water. Habitat enhancement should be agreed with your local authority's ecology team.

As outlined above, NE are overstating the significance of the Sites assemblage of bats (as per the survey data collected). The purpose for the buffers is to ensure that both the Core Bat Habitat (Zone A) remains connected within the wider habitat network and remains relatively undisturbed, with the Buffer (Zone B) to take secure the habitat conditions primarily in relation to the lighting environment. As demonstrated by the Lux Contour Plans (WLC, 2026) and in Figure 1, a significant swathe along the eastern and southeastern boundary will be at <0.2lux. As such, suitable conditions for continued foraging and commuting can be secured.

Lighting Strategy

Natural England welcomes the considerations of the impacts of lighting. The lighting strategy for the development must meet the lux levels prescribed in the TWBMS guidance. The lighting strategy for the scheme should consider the construction and operational phases and be agreed by your Authority. We further advise that a post-development lighting survey is secured by planning condition and that any remedial measures will be implemented in areas of excess light levels. Due to the sensitivity of this location, we would welcome a condition to ensure that no construction lighting is installed.

Lighting Design has been provided by WLC and includes lux contour plans and relevant calculations. The modelling demonstrates that appropriate light levels as per the TWBMS can be secured.

Suitable Alternative Natural Greenspace (SANG)

The proposed scheme falls within the buffer zone to provide mitigation in line with the adopted Trowbridge and Westbury Bat Mitigation Strategy (TWBMS) and is of a scale which would be required to provide SANG and a financial contribution to strategic habitat mitigation. For residential development, the financial contribution is £972.03 per dwelling and should be secured via a legal agreement prior to determination. The Wiltshire Local Plan Review was withdrawn in Spring 2026 and the site allocations are currently unknown, with a Call for Sites currently underway. Therefore, it is advised that the scheme provides bespoke mitigation.

We understand that the proposed development is seeking to provide a financial contribution of £925 per dwelling to mitigate for recreational impacts on woodlands which support bats associated with the Bath and Bradford on Avon Bat SAC. The proposed financial contribution is for new residential development of less than 50 dwellings to contribute to strategic recreational pressure mitigation, as detailed in the TWBMS. The proposed development is of a scale which requires the delivery of SANG, therefore Natural England request clarity on the proposed SANG to be delivered to mitigate for recreational pressure on the Trowbridge Woods in line with the TWBMS. This information should include a SANG strategy which provides details of SANG area, adherence to the SANG criteria and a management plan. Please note that the SANG should ideally be a continuous area of greenspace and that a circular walk, which can include paths around the development outside of the SANG area, should be provided. Should there be any shortfall in functional on site SANG, your authority should agree an amended package for SANG provision. Natural England would be happy to contribute to these discussions.

We note that there is some contradiction between the two paragraphs of the above comment regarding SANG. The first paragraph highlights the strategic mitigation payments for schemes within the yellow zone, but make specific reference to the withdrawal of the Wiltshire Local Plan, and that “*bespoke mitigation*” should be provided. Our interpretation of this comment is that NE are stating that the Strategic Approach as outlined by the TWBMS cannot be relied upon for mitigation. If this is NE's

position, this essentially unpicks the strategic provision in place, and would require all schemes to be assessed on a more individual and bespoke basis. The comments then discuss the SANG/Alternative Greenspace requirements as per the strategic mitigation. Further detail has been provided above (**Section 5.4.7** refers) and seeks to understand and quantify pathways for recreational impacts on sensitive woodlands as outlined above. It is our contention that the scheme provides sufficient mitigation, through a combination of on-site Alternative Greenspace, a function of the location of the scheme, public rights of way, and close proximity to existing recreational provision (at Ssouthwick Country Park). As discussed above, the applicant would be willing to agree a further financial contribution to Wiltshire Council via s106/s111/UU to account for any shortfall.

Construction Environmental Management Plan (CEMP)

A CEMP for the scheme to avoid and mitigate effects on ecological features should be agreed by your Authority prior to commencement of the scheme. The CEMP should detail how the existing watercourse, hedgerows and trees will be protected, and how dust will be controlled during construction.

It is anticipated that the production of a CEMP can be secured by an appropriately worded planning condition.

Landscape and Ecological Management Plan (LEMP)

The scheme should provide for the retention and enhancement of habitats the details of which will be set out in a LEMP. Natural England supports the need for the LEMP which should be agreed by your Authority prior to commencement of the scheme.

As outlined above, a HMMP will be produced as a requirement of the BNG Assessment and includes the same measures as would be outlined in a LEMP. As such the production of a LEMP in addition to a HMMP is an unnecessary duplication. A HMMP will provide the certainty to NE and LPA for long-term management of the Site.

6 Cumulative Assessment

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

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

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

7 Summary Assessment & Conclusions

A Likely Significant Effect was identified for direct loss of foraging habitat, direct loss of roosting habitat, loss/disruption of commuting/foraging routes through indirect impacts such as lighting, disturbance during construction phase and increase in recreational pressures of woodlands associated with the SACs arising from the proposals. The Appropriate Assessment identified that the proposed development should be undertaken in accordance with the mitigation detailed in within this sHRA. Subject to the proposed development being undertaken in accordance with the mitigation detailed above, including the BNG, the implementation of a sensitive lighting strategy, CEMP and LEMP, these measures are considered sufficient to ensure that the construction and operation of the proposed



development does not, either alone or in-combination with other plans or projects, give rise to any adverse effects on the integrity of the Mells Valley SAC or the Bath and Bradford-on-Avon Bats SAC.

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Key:

-  Site boundary
-  0.2 lux contour line on the horizontal plane
-  15m new core bat habitat
-  10m dark corridor



Imagery ©2026 CNES / Airbus, Getmapping plc, Infoterra Ltd & Bluesky, Maxar Technologies. Map data ©2026 Google

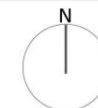
Figure 1:
Post-development Lighting and Buffer Zones

Project:
Blind Lane, Southwick

Client:
Wain Homes Severn Valley

Date:
30/9/2026
Ref:
2102-sHRA-F1

Drawn:
AG
Revision:
-



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