

CORSHAM NEIGHBOURHOOD PLAN 2016 – 2026 HABITATS REGULATIONS ASSESSMENT (HRA)

1. Introduction

- 1.1. This HRA relates to the Corsham Neighbourhood Plan 2016-2026 draft for submission dated February 2018.
- 1.2. The HRA has been carried out to comply with Regulation 105 of the Habitats Regulations 2017. Under these Regulations, a competent authority must consider whether a relevant plan is likely to have a significant effect on any European sites before deciding to give any consent, permission or other authorisation. If the screening exercise demonstrates significant effects are likely, whether or not these are addressed through mitigation measures¹, the competent authority must undertake an appropriate assessment to examine the effects of the plan on the conservation objectives of the European Sites in question, consult the appropriate nature conservation body and have regard to its representations. Both the screening and any subsequent appropriate assessment, must consider the impacts of the plan alone and in combination with other plans or projects.
- 1.3. It is usually the case that a plan of this nature does not go into the detailed aspects of development proposals and therefore the full effects of potential development cannot be accurately assessed at the plan making stage. Those details will typically be identified through a planning application which would be subject to further, more detailed HRA. The principle that a HRA need only consider the effects of a proposal or policy in as much detail as is specified by the plan was explained by Advocate General Kokott in a judgement brought against the UK government in 2005:
*“Many details are regularly not settled until the time of the final permission. It would also hardly be proper to require a greater level of detail in preceding plans or the abolition of multi-stage planning and approval procedures so that the assessment of implications can be concentrated on one point in the procedure. Rather, adverse effects on areas of conservation must be assessed at every relevant stage of the procedure to the extent possible on the basis of the precision of the plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure.”*²
- 1.4. Where appropriate assessment is undertaken, the competent authority may go on to authorise the plan or project provided that it will not adversely affect the integrity of any European sites. Otherwise the plan cannot be authorised unless it meets specific statutory tests.
- 1.5. Wiltshire Council has conducted the following HRA as competent authority for the Corsham Neighbourhood Plan (NDP). Where risks to European Sites are identified, changes are recommended to remove or reduce these and these should be incorporated into the plan before it is made. Likewise, if the policies or planning context change after the HRA is completed, the HRA process must be repeated before the final plan is considered by a referendum and adopted.

¹ Court of Justice of the European Union, Case C 323/17 “People Over Wind”/P. Sweetman v Coillte Teoranta

² Commission of the European Communities v UK and NI, opinion of Advocate General KoKott, 9 June 2005, Case C-6/04

2. Screening Methodology

- 2.1. Each element of the plan has been categorised against screening criteria developed by Natural England to provide a clear audit trail for the screening assessment.
- 2.2. The screening criteria used are as follows:
 - Category A1: The policy will not itself lead to development e.g. because it relates to design or other qualitative criteria for development;
 - Category A2: The policy is intended to protect the natural environment;
 - Category A3: The policy is intended to conserve or enhance the natural, built or historic environment;
 - Category A4: The policy would positively steer development away from European sites and associated sensitive areas;
 - Category A5: The policy would have no effect because no development could occur through the policy itself, the development being implemented through later policies in the same plan, which are more specific and therefore more appropriate to assess for their effects on European Sites and associated sensitive areas.
 - Category B – no significant effect;
 - Category C – likely significant effect alone; and
 - Category D – Likely significant effects in combination.
- 2.3. The effect of each policy has been considered both individually and in combination with other plans and projects (see table in section 4 below). Where potential for likely significant effects have been identified, an appropriate assessment is undertaken in subsequent sections.

3. Higher Level HRAs

3.1 The Wiltshire Core Strategy HRA (October 2009, February 2012³, March 2013⁴, and April 2014⁵) identified general parameters to determine the likelihood of potential impact on Natura 2000 (European protected) sites. The following parameters were identified and assessed for the following Natura 2000 sites.

- *Recreation – Natura 2000 sites within 5km of the plan area, or where Salisbury Plain SPA/SAC is within 15km of the plan area:*
 - Salisbury Plain SAC and SPA
 - River Avon SAC
 - New Forest SAC / SPA
- *Hydrology / Hydrogeology - Sites that fall wholly or partly within the Wessex Water Resource Zone may be susceptible to impact:*
 - Salisbury Plain SAC / SPA
 - Bath and Bradford on Avon Bats SAC
 - Pewsey Downs SAC
 - North Meadow and Clattinger Farm SAC

³ Wiltshire Core Strategy Submission Draft – Assessment under the Habitats Regulations, Wiltshire Council, February 2012

⁴ Wiltshire Core Strategy – Assessment under the Habitats Regulations, Wiltshire Council, March 2013

⁵ Wiltshire Core Strategy Updated Habitats Regulations Assessment, April 2014

- River Avon SAC
- River Lambourn SAC
- Kennet & Lambourn Floodplain SAC
- *Air Pollution / Nitrogen Deposition – Natura 2000 sites within 200m of a main road*
 - Porton Down SPA
 - Salisbury Plain SAC / SPA
 - Southampton Water SPA
 - Clattinger Farm SAC
 - River Avon SAC
 - Rodborough Common SAC
 - Cotswolds Beechwoods SAC
- *Physical Damage / Interruption of Flight Lines / Disturbance*
 - Bath and Bradford on Avon Bats SAC
 - Porton Down SPA

3.2 In terms of recreation impacts, the NDP area lies well beyond the distance from which the majority of day visitors come to the New Forest or could affect the River Avon SAC. The NDP area lies beyond that which might result in risk of additional recreational pressure for the Salisbury Plain SPA. Risks for the Salisbury Plain SAC habitat features were screened out of appropriate assessment for the Core Strategy on the advice of Natural England as it is considered that there can be no mechanism for adverse effect as a result of implementing the Core Strategy.

3.3 In terms of hydrology/hydrogeology, Corsham drains into the Bristol Avon, rather than the Hampshire Avon, therefore the River Avon SAC is not potentially impacted. No water resource issues have been identified for the Bath and Bradford on Avon Bats SAC which is the only SAC to lie fully within the Bristol Avon catchment. The Bristol Avon is also not identified as a cause of water resource issues for the Salisbury Plain SAC/SPA.

3.4 The Wiltshire Core Strategy identified that increased traffic would lead to potential effects through an increase in atmospheric pollution and nitrogen deposition upon a range of Natura 2000 sites within 200m of a main road. Such effects were considered to be very small and difficult to predict at the strategic level⁶ (WCS HRA Update February 2014). The Corsham NDP does not allocate any housing sites within the plan area, although the plan does support a limited number of small scale residential developments (of up to twelve houses per village) in the smaller villages of Gastard and Neston, where there is an identified local need. The plan does not therefore discourage additional housing, however the amount likely to come forward within the lifetime of the plan is likely to be a very small number in relation to the total for the county. All of the Natura 2000 sites listed above, except the Bath and Bradford on Avon Bats SAC are a considerable distance from the NDP area and effects are likely to be negligible. In relation to this site the Wiltshire Core Strategy HRA concluded no likely significant effect where

⁶ Update to the Wiltshire Core Strategy habitats Regulations Assessment, February 2014 (Exam/89)

the existing approach to mitigation in Core Policy 55 is implemented. It is concluded that the housing which could occur within this NDP area, within the lifetime of the plan, would not have an adverse effect on Natura 2000 sites through nitrogen deposition.

- 3.5 The NDP area is too remote to have implications for stone curlews breeding at Porton Down.
- 3.6 Since the Core Strategy was adopted, the Council has published a pre-submission draft of the Wiltshire Housing Site Allocations Plan (HSAP) together with a HRA dated 21 June 2017. A schedule of proposed changes was considered by Cabinet supported by an Addendum to the HRA dated May 2018. A final schedule of changes and an Addendum to the HRA incorporating minor factual changes were published in September 2018 for public consultation.
- 3.7 The screening criteria for the HSAP were modified for some European sites from those used in the core strategy following the results of new surveys and in light of advice received from Natural England. The following screening applies the most up to date criteria available from the HSAP.
- 3.8 The Wiltshire HSAP Community Topic Paper – Corsham concluded that there is not an indicative residual requirement for the Market Town of Corsham to be delivered during the Plan period. Therefore, the Plan will not need to allocate additional land to help meet an indicative residual requirement. It is proposed that housing sites will not be identified for allocation within Corsham and the site selection process ends after Stage 1. The HRA for the WHSAP does not therefore include screening for Corsham.

4. Screening of Policies in Corsham Neighbourhood Plan Submission Draft February 2018

The draft Corsham NP comprises seven sections containing policies. These are:

- Section 1: Business & Economy
- Section 2: Environment
- Section 3: Health & Wellbeing
- Section 4: Heritage
- Section 5: Housing
- Section 6: Lifelong Learning
- Section 7: Transport

- 4.1 Taking into consideration the location, scale and nature of proposals in the NDP, the only European Site where there is a mechanism for effect is the Bath and Bradford on Avon Bats SAC. All parts of the plan have been screened for potential impacts which may arise from the plan alone or in combination with other plans and projects. Eleven policies have the potential to give rise to significant effects and are therefore taken forward to appropriate assessment in sections 5 and 6 below.
- 4.2 Other policies would either not lead directly to development or would have no significant effects either alone or in combination with other plans and projects due to the scale and nature of the proposals in the plan.

TABLE: Habitats Regulations Assessment Screening of the Southwick Neighbourhood Plan

A / B (Green) – Screened out
 C / D (Red) – Screened in

Policy Area	Policy	Category after initial screening	Issue	Screening category after changes recommended by appropriate assessment
Business & Economy	BE1 - Development proposals which are well located so as to strengthen and support the growth of Corsham’s economy will be supported, particularly where the provision of new jobs for local people or business start-up units and/or growth in the innovation, education and knowledge sectors are being proposed and the inward investment for local business has been demonstrated.	A1	The policy itself will not lead to specific development. The policy does not name locations or amount of development.	
	BE2 –To encourage Tourism and business travel to Corsham, the development of a hotel close to the site safeguarded for the future Railway Station and associated infrastructure (Figure 17 on page 46) will be supported where the proposal is in accordance with the Corsham Design Guide and Corsham Batscape Strategy and thus seeks to address the biodiversity and geodiversity sensitivities of the location.	C & D	The policy itself will not lead to the development of a hotel and a specific site is not allocated. However, the site safeguarded for the future Railway Station and associated infrastructure is directly east, approximately 2km along the railway line, from Box Mine SSSI, a key component of the B&BoA Bats SAC. In addition, all except for a small part on the eastern edge of the settlement boundary of Corsham lies within the 4km buffer zone (Bat Special Area of Conservation (SAC)	B

Policy Area	Policy	Category after initial screening	Issue	Screening category after changes recommended by appropriate assessment
			<p>Planning Guidance for Wiltshire Council)for Greater Horseshoe bats, while the western part of the settlement area lies within the 2km buffer for Lesser Horseshoe bats and the 1.5km buffer for Bechstein’s bats, the three Annex II bat species that are either the main reasons for designation or are qualifying features of the SAC. Any development within the buffer zones (i.e. across most of the Corsham settlement area or along the linear route of the railway line, which contributes to primary habitat connectivity for wildlife) has the potential to result in adverse effects to bats either from loss of foraging and commuting habitat or loss of roosting sites or both, or from loss of habitat function from increases in artificial lighting. Although the policy includes the requirement for accordance with the Corsham Batscape Strategy, in order to address the biodiversity and geodiversity sensitivities of the location, this amounts to mitigation and therefore cannot be considered within the initial screening of the HRA (<i>People over Wind</i>). In the absence of this requirement, the policy would not be HRA compliant.</p>	
	<p>BE3—Development which safeguards and/or contributes to the strengthening of the vitality and identity of West Corsham will be supported. Proposals must be in accordance with the Corsham Design Statement and Corsham</p>		<p>The policy itself does not identify specific sites, however any development within West Corsham has potential to result in adverse impact for the three Annex II bat species for which the SAC is designated or which are qualifying features of the SAC, because it falls within or is immediately adjacent to core sustenance zones for these bat species (Bat Special Area of Conservation (SAC) Planning Guidance</p>	<p>B</p>

Policy Area	Policy	Category after initial screening	Issue	Screening category after changes recommended by appropriate assessment
	<p>Batscape Strategy and, where applicable, seek opportunities to:</p> <ul style="list-style-type: none"> a) Expand the business potential of West Corsham in accordance with an identified need; b) Create an active frontage on to Westwells Road to contribute to the creation of a more coherent community; c) Make strategic connections to facilitate easy access and reinforce interconnections within West Corsham and surrounds; d) Strengthen the urban arrangement with Green Buffers, as shown in Figure 5, which define the rural edges of West Corsham e) Encourage new Small and Medium Enterprises with a defence and/or ICT specialism. <p>Development proposals in proximity to residential areas must seek to avoid adversely impacting on residential amenity or, where this is not possible, incorporate appropriate mitigation measures</p>		<p>for Wiltshire Council). Parts a) and b) suggest likely locations for physical change through development or structural alteration. Although the policy includes the requirement for accordance with the Corsham Batscape Strategy, in order to address the biodiversity and geodiversity sensitivities of the location, this amounts to mitigation and therefore cannot be considered within the initial screening of the HRA (<i>People over Wind</i>). In the absence of this requirement, the policy would not be HRA compliant.</p>	

Policy Area	Policy	Category after initial screening	Issue	Screening category after changes recommended by appropriate assessment
	into the design of the proposal.			
	<p>BE4—Development which contributes to the revitalisation of Corsham Town Centre in accordance with the Corsham Framework Masterplan (illustrated in Figure 3, page 19) will be supported. Proposals must be in accordance with the Corsham Design Guide and, where applicable, seek opportunities to:</p> <ul style="list-style-type: none"> a) Enhance/remodel the Martingate Centre; b) Integrate Coach Parking (minimum of two spaces); c) Develop a new supermarket with mixed-use opportunities and associated infrastructure as shown in Figure 3; d) Identify start-up employment and within development proposals as defined in Figure 3; e) Remodelling, relocation and/or environmental enhancements of the Town Centre car parks, 	C & D	<p>The policy seeks to support redevelopment of some areas of the Town Centre, however any development within Corsham has potential to result in adverse impact for Greater Horseshoe bats for which the SAC is designated, because it falls within core sustenance zones for this bat species (Bat Special Area of Conservation (SAC) Planning Guidance for Wiltshire Council). Parts a) to g) suggest likely locations for physical change through development or structural alteration. Although the policy includes the requirement for accordance with the Corsham Batscape Strategy, in order to address the biodiversity and geodiversity sensitivities of the location, this amounts to mitigation and therefore cannot be considered within the initial screening of the HRA (<i>People over Wind</i>). In the absence of this requirement, the policy would not be HRA compliant.</p>	B

Policy Area	Policy	Category after initial screening	Issue	Screening category after changes recommended by appropriate assessment
	<p>providing that there is no net loss of spaces; f) Enhance gateways into Corsham Town (see Figure 11 on page 34); and g) Create vital social, economic and environmental linkages between key commercial locations within Corsham Town and the wider Corsham Neighbourhood Plan Area.</p> <p>Where applicable, suitable alternative premises will need to be identified in order for businesses and residents to relocate before redevelopment of the Newlands Road Area can commence.</p>			
Environment	<p>E1–Proposals for development which protect and, where possible, enrich the habitat of the protected bat species associated with the Bath and Bradford on Avon Bats Special Area of Conservation (SAC) will be supported.</p>	A2	<p>The policy requires that proposals for development are in line with the Corsham Batscape Strategy, which itself is designed to ensure that important habitats for bats are protected and conserved within the development process, so that there will be no adverse impacts on the designated features or the favourable conservation status of the Bath & Bradford on Avon Bats Special Area for Conservation (SAC). In</p>	

Policy Area	Policy	Category after initial screening	Issue	Screening category after changes recommended by appropriate assessment
	<p>Applicants will need to demonstrate how their proposals would contribute to the delivery of the Corsham Batscape Strategy, including details of measures to preserve and, where possible, enhance wildlife corridors, (especially with regard to foraging areas), priority flight lines and maternity roosts.</p> <p>Proposals that enhance the biodiversity of Corsham will be supported, provided they are fully compliant with the Corsham Batscape Strategy¹ and the Corsham Design Guide.</p> <p>¹The Corsham Batscape Strategy fully accords with the Bat Special Area of Conservation (SAC) Planning Guidance for Wiltshire Council. The Corsham Batscape Strategy is a more detailed reflection of how the guidance should be applied to development in the Corsham Area</p>		<p>addition, each development proposal brought forward within the Corsham NP area will undergo a Habitats Regulation Screening Assessment as part of the planning consultation.</p>	
	<p>E2–All new development within Corsham should seek to contribute to the achievement of sustainable development and, in particular,</p>	A3	<p>As above, each development proposal brought forward within the Corsham NP area will undergo a Habitats Regulation Screening Assessment as part of the planning consultation.</p>	

Policy Area	Policy	Category after initial screening	Issue	Screening category after changes recommended by appropriate assessment
	<p>proposals should demonstrate how design, construction and operation has sought to:</p> <ul style="list-style-type: none"> a) Promote innovative proposals which achieve low carbon sustainable design; b) Reduce the use of fossil fuels; c) Promote the efficient use of natural resources, the re-use and recycling of resources, and the production and consumption of renewable energy; d) Safeguard and where possible enhance biodiversity and geodiversity; e) Reduce flood risk; f) Increase grey water re-use; g) Adopt best practice in sustainable urban drainage; h) Ensure that the design and location of new development is resilient to the effects of flooding i) Adopt and facilitate the flexible development of low and 			

Policy Area	Policy	Category after initial screening	Issue	Screening category after changes recommended by appropriate assessment
	zero carbon energy through a range of technologies; and j) Link the provision of low and zero carbon energy infrastructure in new developments to existing buildings.			
	<p>E3—Development proposals should protect, conserve and where possible enhance the special qualities of the Cotswold AONB³ and the distinctive characteristics of the Landscape Setting of the Corsham Rolling Lowlands⁴. Development should:</p> <ul style="list-style-type: none"> a) Maintain existing woodland cover and hedge trees; b) Restore field boundaries around settlements where there is gapping or degradation; c) Conserve the rural character to the south of the area; d) Demonstrate how the proposal relates to 	A3		

Policy Area	Policy	Category after initial screening	Issue	Screening category after changes recommended by appropriate assessment
	<p>Corsham in terms of landscape, setting and visual effects;</p> <p>e) Create new woodland cover where necessary to mitigate the landscape or visual impact of new development; and</p> <p>f) Protect existing Public Rights of Way and link in new routes to offer local people recreational opportunities in terms of countryside access routes and cycleways.</p> <p>All proposed landscaping must be of an appropriate species mix and of local provenance in accordance with the Corsham Design Guide and Corsham Batscape Strategy.</p> <p>³ http://www.cotswoldsaoanb.org.uk/wp-content/uploads/2017/07/landscape-9.pdf</p> <p>⁴ http://www.wiltshire.gov.uk/north_wiltshire_landscape_character_assessment_2004_volume_1.pdf</p>			

Policy Area	Policy	Category after initial screening	Issue	Screening category after changes recommended by appropriate assessment
	<p>E4—Development that results in the loss of green spaces identified on Figure 6 (on page 28) or that results in any harm to their character, setting, accessibility, appearance, general quality or amenity value would only be permitted if the community would gain equivalent benefit from the provision of suitable replacement green space or gain significant social, economic or environmental benefits from an alternative facility.</p>	A3		
	<p>E5—In the Rural Green Buffer as defined in Figure 5 (Page 24), new development will be strictly controlled. Approval will not be given for the construction of new buildings which, individually or cumulatively, would lead to the coalescence of settlements or the loss of bat foraging habitat. New buildings for the purposes of agriculture, forestry, or other uses</p>	A4	<p>The policy will positively steer development away from European sites and associated sensitive areas by requiring that bat foraging areas are protected from loss through development. Additional Habitats Regulation Assessment screening within the planning process will ensure that developments within the Corsham NP area are compliant with the European legislation.</p>	

Policy Area	Policy	Category after initial screening	Issue	Screening category after changes recommended by appropriate assessment
	appropriate to a rural area will be permitted, where they are acceptable in environmental terms.			
Health & Wellbeing	<p>HW1–Development proposals should seek to protect, improve and extend Corsham’s green infrastructure network as identified on Figure 6 (on page 28) to support a healthy community. Innovative proposals that contribute to sustainable pedestrian/cyclist linkages between the town and its rural setting will be supported, provided they are fully compliant with the Corsham Design Guide and Corsham Batscape Strategy.</p>	A3		
	<p>HW2–Proposals to develop a second surgery or expand capacity at the existing surgery will be supported. Proposals must be in accordance with the Corsham Design Guide and Corsham Batscape Strategy.</p>	C&D	<p>The policy supports a specific development either at the site of the existing surgery or for a second surgery which would be on an additional site. Any development within Corsham has potential to result in adverse impact for Greater Horseshoe bats for which the SAC is designated, because it falls within core sustenance zones for this bat species (Bat Special Area of Conservation (SAC) Planning Guidance for Wiltshire Council). Areas in the west of Corsham may also impact on Lesser Horseshoe bats and/or Bechstein’s bats.</p>	B

Policy Area	Policy	Category after initial screening	Issue	Screening category after changes recommended by appropriate assessment
			<p>Although the policy includes the requirement for accordance with the Corsham Batscape Strategy, in order to address the biodiversity and geodiversity sensitivities of the location, this amounts to mitigation and therefore cannot be considered within the initial screening of the HRA (<i>People over Wind</i>). In the absence of this requirement, the policy would not be HRA compliant.</p>	
	<p>HW3—Where appropriate and where the need has been identified, new housing development must provide appropriate new healthcare facilities and infrastructure on site or directly fund and/or deliver off-site facilities within an appropriate time scale to enable the sustainable growth of Corsham.</p>	A1		
	<p>HW4—Community green space (including formal and informal sports pitches) identified in Figure 6 (on page 28) will be safeguarded and enhanced through new development proposals.</p>	A1		

Policy Area	Policy	Category after initial screening	Issue	Screening category after changes recommended by appropriate assessment
	Developers must engage with Corsham Town Council at an early opportunity to discuss and potentially secure the long-term management of the open spaces in the public interest.			
	HW5 —Proposals that contribute towards making Corsham more family inclusive and dementia-friendly, and future-proofing development to allow flexibility and provide accessibility for all will be supported where they are in accordance with the Corsham Design Guide.	A1		
	HW6 —Development proposals will be supported where they create safe and accessible environments where crime and disorder, and the fear of crime in accordance with ‘Secure by Design’ requirements, do not undermine quality of life or the community cohesion of Corsham.	A1		

Policy Area	Policy	Category after initial screening	Issue	Screening category after changes recommended by appropriate assessment
	<p>HW7–The inclusion of public art within the context of the proposal site itself will be supported. Public art should reflect those founding elements unique to Corsham such as wool, stone, military links and communications and should contribute towards the delivery of the Creative Corsham Strategy 2016.</p>	A1		
	<p>HW8–Proposals that result in harm to or loss of allotments in the Corsham Neighbourhood Plan Area will not be supported, unless replacement provision is made, which is of good quality and located at reasonable convenience for the existing plot holders.</p>	A1	<p>Loss of allotments with replacement elsewhere may potentially affect bat foraging areas. The policy will not directly lead to loss or relocation of allotments but if it does arise this should be in line with the Corsham Batscape Strategy. Planning permission is likely to be required, which will trigger the requirement for screening under the Habitats Regulations.</p>	
Heritage	<p>HE1–Developments which protect the distinctive historic character of Corsham whilst enhancing the vitality of the town will be</p>	A3		

Policy Area	Policy	Category after initial screening	Issue	Screening category after changes recommended by appropriate assessment
	supported where they are fully compliant with the Corsham Design Guide and the Batscape Strategy.			
	HE2 –Development proposals should protect, conserve and where possible enhance the distinctive characteristics of the built settlement and how it responds to the special qualities of the Cotswold AONB and the Landscape Setting of the Corsham Rolling Lowlands (Character Area 10, as identified within the North Wiltshire Landscape Character Assessment). Development proposals that potentially affect the setting of the AONB should be undertaken in conjunction with the provisions of the latest Cotswold AONB Management Plan.	A3		

Policy Area	Policy	Category after initial screening	Issue	Screening category after changes recommended by appropriate assessment
	<p>HE3–All new development within the Corsham Neighbourhood Plan Area must demonstrate good quality design. This means responding to and integrating with local surroundings and landscape context as well as the existing built environment. Good design for Corsham means:</p> <ul style="list-style-type: none"> a) Achieving high quality design that respects the scale, character and historic built fabric of existing and surrounding buildings; b) Respecting established building plot arrangements, widths and architectural rhythm of the street scene including front gardens, railings,walls and hedges; c) Establishing ‘gateways’ into the town (shown in Figure 11 on page 34) at; <ul style="list-style-type: none"> (i) Cross Keys, (ii) Pickwick, (iii) Pound Pill, to reinforce the identity of the 	A3	<p>Although specific areas of Corsham are mentioned in relation to preferred areas and types of development, the policy itself will not result directly in development. In addition, all development proposals will undergo a Habitats Regulations Assessment screening procedure as part of the planning process.</p>	

Policy Area	Policy	Category after initial screening	Issue	Screening category after changes recommended by appropriate assessment
	<p>historic centre and enhance the visitor awareness and experience;</p> <p>d) Using good quality materials that complement the existing historic vernacular of Corsham whilst respecting the individual context of each proposal;</p> <p>e) Adopting the principles of sustainable urban drainage; and</p> <p>f) Considering the key views set out in Figures 13 and 14 (on pages 36 and 37) within any development proposal. These views have been identified as important by the community.</p> <p>All proposals should be in accordance with the Corsham Design Guide and Corsham Batscape Strategy. Planning permission will not be granted for development that undermines these core design principles and fails to improve the form and function of the Corsham Neighbourhood Plan Area.</p>			

Policy Area	Policy	Category after initial screening	Issue	Screening category after changes recommended by appropriate assessment
	<p>HE4–Innovative proposals which add to the vitality of Corsham will be supported as long as design, scale, materials, colours and proportion respect the prevailing historic context and are in accordance with the Corsham Design Guide and Corsham Batscape Strategy</p>	A1		
Housing	<p>H1–During the period 2016 to 2026, the provision of up to 12 additional houses per village, delivered through small scale proposals of less than 10 dwellings on rural exception sites, will be supported at the villages of Gastard and Neston, where there has been an identified local need. These sites will provide 100% affordable housing unless it is demonstrated, on viability grounds that a small proportion will need to</p>	C& D	<p>Both Gastard and Neston are within or immediately adjacent to core sustenance zones identified in the Bat Special Area of Conservation (SAC) Planning Guidance for Wiltshire Council for all three Annex II species associated with the SAC. Therefore any development which results in loss of foraging or commuting habitat, or loss of roost sites, or loss of function of the habitat and landscape within and between development sites, without mitigation, would cause adverse effects on the SAC features.</p>	B

Policy Area	Policy	Category after initial screening	Issue	Screening category after changes recommended by appropriate assessment
	<p>be open market housing. Proposals must demonstrate appropriate infrastructure links with the town and comply with the Corsham Design Guide and Corsham Batscape Strategy.</p>			
	<p>H2—Proposals for brownfield developments within the Corsham settlement boundary or small infill sites within the villages identified above will be supported where they:</p> <ul style="list-style-type: none"> a) have a scale, form and density which would be complimentary to surrounding properties and would not result in the loss of amenity for existing residents; b) would achieve high standards of sustainable and low carbon design; and c) would be accompanied by appropriate provisions for parking, access and storage of waste. 	C&D	<p>The whole of the Corsham settlement boundary and the villages identified above are within or immediately adjacent to core sustenance zones identified in the Bat Special Area of Conservation (SAC) Planning Guidance for Wiltshire Council for all three Annex II species associated with the SAC. Therefore any development which results in loss of foraging or commuting habitat, or loss of roost sites, or loss of function of the habitat and landscape within and between development sites, without mitigation, would cause adverse effects on the SAC features.</p>	B
	<p>H3—All new housing developments within the Corsham</p>	A3		

Policy Area	Policy	Category after initial screening	Issue	Screening category after changes recommended by appropriate assessment
	<p>Neighbourhood Plan Area must demonstrate good quality design. This means responding to and integrating with local surroundings and landscape context as well as the existing built environment. Good design for Corsham means:</p> <ul style="list-style-type: none"> a) achieving high quality design that respects the scale, character and historic built fabric of existing and surrounding buildings; b) respecting established building plot arrangements, widths and architectural rhythm of the street scene including front gardens, railings, walls and hedges; c) using good quality materials that complement the existing historic vernacular of Corsham whilst respecting the individual context of each proposal; d) adopting the principles of sustainable urban drainage; e) innovative proposals to achieve low carbon sustainable design; and f) to minimise the fear of crime in accordance with 'Secure by Design' 			

Policy Area	Policy	Category after initial screening	Issue	Screening category after changes recommended by appropriate assessment
	<p>requirements. To achieve high quality, well managed housing developments, all proposals should be in accordance with the Corsham Design Guide and Corsham Batscape Strategy</p>			
	<p>H4–All housing development proposals must be supported by an assessment of their impact on the existing infrastructure of the Corsham Neighbourhood Plan Area. The assessment must be accompanied by a mitigation strategy and include methods for monitoring the implementation of the proposed mitigation measures</p>	A3		
Lifelong Learning	<p>L1–Proposals for development will be required to identify their likely impact on Corsham’s infrastructure, services and educational facilities and to demonstrate how any such impacts will be addressed and mitigated for.</p>	A1		

Policy Area	Policy	Category after initial screening	Issue	Screening category after changes recommended by appropriate assessment
	<p>L2–Development proposals that would facilitate the expansion of Bath Spa University and other higher and further education and associated infrastructure within the Corsham Neighbourhood Plan Area will be supported. Development must be sustainably located where there are appropriate links to the footpath network and local facilities. Any proposal must be in accordance with the Corsham Design Guide and Corsham Batscape Strategy.</p>	C&D	<p>The NP area lies within or immediately adjacent to core sustenance zones identified in the Bat Special Area of Conservation (SAC) Planning Guidance for Wiltshire Council for all three Annex II species associated with the SAC. Therefore any development which results in loss of foraging or commuting habitat, loss of roost sites, or loss of function of the habitat and landscape within and between development sites, without mitigation, would cause adverse effects to the SAC features .</p>	B
Transport	<p>T1–Developments which maintain and/or improve traffic safety and transport services will be supported where they are fully compliant with the Corsham Design Guide and Corsham Batscape Strategy. Proposals should demonstrate how the development’s vehicular access</p>	C&D	<p>Lighting may be a significant issue in traffic safety measures. Without adherence to the Corsham Batscapes Strategy, there is potential for interruption of flightlines due to increases in lighting volume or intensity, rendering adjacent areas unfavourable for bat foraging or commuting.</p>	B

Policy Area	Policy	Category after initial screening	Issue	Screening category after changes recommended by appropriate assessment
	arrangements will mitigate the negative impacts of traffic in the area.			
	T2 –Development proposals that include safe pedestrian and cycle routes within the town and connecting villages will be supported where they are in accordance with the Corsham Design Guide and Corsham Batscape Strategy. Such proposals will include the provision of well-located and appropriate bicycle parking facilities.	C&D	Lighting may be a significant issue in pedestrian and cycle route safety measures. Without adherence to the Corsham Batscapes Strategy, there is potential for interruption of flightlines due to increases in lighting volume or intensity, rendering adjacent areas unfavourable for bat foraging or commuting.	B
	T3 –The Corsham Neighbourhood Plan proposes to establish the ‘Corsham Link’ to sustainably connect the town and surrounding villages with the provision of a safe pedestrian/cycle route as shown in Figure 7 (on page 29). Consideration should be given to the biodiversity and geodiversity sensitivity of the route, ensuring that all proposals protect and	C&D	Lighting may be a significant issue in pedestrian and cycle route safety measures. Without adherence to the Corsham Batscapes Strategy, there is potential for interruption of flightlines due to increases in lighting volume or intensity, rendering adjacent areas unfavourable for bat foraging or commuting. In Addition, safe routes may necessitate the removal of vegetation, reducing foraging and commuting opportunities for bats.	B

Policy Area	Policy	Category after initial screening	Issue	Screening category after changes recommended by appropriate assessment
	<p>where possible enhance habitats and ecological networks and enhance access to key geological exposures at the location. Developer contribution by way of S.106 will be sought where a proposal directly affects the route of the Corsham Link. Delivery of the Corsham Link will also be via the Community Infrastructure Levy (CIL).</p>			
	<p>T4–The area shown on Figure 17 (page 46) will be safeguarded for the construction of a new railway station and its associated infrastructure. The safeguarding of this site will stimulate sustainable development growth to the south of the railway line within the next plan period following the development of the station itself.</p>	C&D	<p>The safeguarding of the site for future construction of the new railway station will not directly lead to its development, however it sets down a marker that this is what is intended for the site. This part of Corsham is within the core sustenance zones identified within or immediately adjacent the Bat Special Area of Conservation (SAC) Planning Guidance for Wiltshire Council, for all three Annex II bats species associated with the SAC. In addition, the railway line between Box Mine SSSI and the safeguarded site for the railway station, currently contributes to primary connective habitat for foraging and commuting by bats using the mine. The resulting physical changes to the site and surrounding area both in terms of habitat loss and loss of function of habitat (due</p>	B

Policy Area	Policy	Category after initial screening	Issue	Screening category after changes recommended by appropriate assessment
			to lighting impacts) would cause adverse effects to the conservation status of the SAC.	

5. Appropriate Assessment – Bath and Bradford on Avon Bats SAC

Background to the Bath and Bradford on Avon SAC

- 5.1 The following account clarifies the key geographical and ecological relationships between the Bath and Bradford on Avon Bats SAC and the Corsham NDP area, as far as these are currently known. Details of the conservation objectives are available online <http://publications.naturalengland.org.uk/publication/6279810384920576>. The current version is dated 27 November 2018 Version 3.
- 5.2 The SAC designation extends across former stone mines which are hibernation and swarming sites for the three species of bat which are features of this SAC; great and lesser horseshoe and Bechstein's bats. The nearest mine is at Box approximately 1.3km from the western edge of Corsham settlement boundary. Others occur near Winsley and Bath. The mines are mainly used by bats during the winter and autumn.
- 5.3 While the SAC is not within or immediately adjacent to Corsham NDP area, the bats roost and feed across a much wider area during the spring and summer. Horseshoe bats generally breed in buildings while a significant breeding colony of Bechstein's bats occurs in woodlands to the south of Trowbridge and are likely present in woodland between Trowbridge and Box. Connections between known hibernation sites and known summer roosting (including maternity) sites have been indicated by local bat group ringing studies. The Council has prepared guidance to demonstrate how development across the whole bat landscape must take account of the SAC⁷. It identifies a number of core roosts with core areas around them (termed "consultation zones") to show where bat activity is likely to be concentrated and where particular precautions will be required.
- 5.4 Under the above guidance, the whole of Corsham NPA lies within one or more of the core areas for Greater Horseshoe bats associated with known hibernation or summer maternity sites. Outside of the core areas around these roosts and especially between core areas, it is likely all three species of Annex II bat associated with the SAC utilise linear features to commute between summer (maternity), swarming and hibernation sites at Box and Bath.
- 5.5 There are a large number of records of lesser and greater horseshoes foraging / commuting across areas to the immediate west of Corsham and through gaps in developed areas running north and south through Corsham in general. Many of these records have been obtained through systematic surveys carried out in support of recent planning applications. Roost sites for colonies of lesser and greater horseshoes are known in buildings at several ex-MoD sites in the local area, including Rudloe Manor, Royal Arthur, Basil Hill Barracks and Westwells, while individual bats of these species are often found in older buildings within the town where immediate access to foraging is available. Greater and lesser horseshoes have also been regularly recorded at mine sites around Neston and Gastard, to the east and south east of Corsham.
- 5.6 Records of Bechstein's bats are fewer in the local area, however these bats are extremely difficult to identify from bat detector surveys and are often recorded under the general category of *myotis* bat (the genus). This may explain the lack of records in an area known to support suitable habitat for roosting and commuting/foraging. Some trapping surveys have been commissioned in relation to planning applications and these have confirmed that Bechstein's bats are indeed present in the local area and that some key flight lines enable these bats successfully commuting between summer roosting, swarming and winter hibernation sites. Where *myotis* species have been recorded, it is likely that these will include a percentage of Bechstein's bats.

⁷ Bat Special Areas of Conservation, planning guidance for Wiltshire. Issue 3.0, 10 September 2015

- 5.7 Given the proven association between known summer and winter roosts, it is reasonable to assume that all suitable habitat within the core areas and connective habitat between core areas and into the wider landscape area, are likely to be used by all three species of bat associated with the SAC.

Plans and Projects to be considered in-combination

- 5.8 The screening Assessment found that the Corsham NDP could lead to significant effects on the Bath and Bradford on Avon Bats SAC in combination with other plans and projects. The following assessment has been conducted taking the following plans and projects into consideration:

- Wiltshire Core Strategy (Adopted January 2015)
- Wiltshire Housing Site Allocations Plan submission document May 2018 with proposed schedule of changes dated September 2018
- Application 17/03844/REM (Bradford on Avon)
- Application W/13/00643/FUL
- Application 16/03721/REM
- Application 15/00712/WCM
- Application 16/09292/REM
- Application 17/12270/REM
- Application 17/07028/REM
- Application 17/12402/DP3
- Application 18/10303/FUL
- Application 17/11032/REM

Analysis of policies in the NDP screened into appropriate assessment (grouped where relevant)

Policies BE2, BE3, BE4 (Business & Economy), HW2(Health & Wellbeing), T4 (Transport)

- 5.9 Policy BE2 supports the construction of a hotel close to the site safeguarded for the provision of a new railway station. BE3 supports development that safeguards and revitalises West Corsham. BE4 supports the construction of a new supermarket. HW2 supports the provision of a second surgery. T4 supports the construction of a new railway station for the town. In addition, development proposals such as the construction of a new railway station and a new hotel are likely to require additional associated infrastructure such as new road layouts and lighting schemes.
- 5.10 The whole of the Corsham NP area falls within the 4km core area for greater horseshoe bats associated with the Bath & Bradford on Avon Bats SAC. In addition, the western parts of the plan area fall within or immediately adjacent to one or more 2km core areas for lesser horseshoe bats and 1.5km buffers for Bechstein's bats, there is potential for any development within the plan area to cause disruption to established foraging and commuting corridors through removal of vegetation and additional lighting. Demolition or significant alteration to existing buildings may destroy established or potential/available roost sites for horseshoe bats.
- 5.11 These five policies each include the requirement that proposals for these developments must be in accordance with the Corsham Batscapes Strategy, which forms Part 3 of the Corsham Neighbourhood Plan. The Strategy gives clear guidance on measures required to protect and enhance the habitats and features available to bats within the plan area, particularly in regard to habitat connectivity and function throughout the urban landscape.

- 5.12 Since the Strategy forms part of the Corsham NP and since these policies all require adherence to the Strategy, a mechanism is established within the planning system to ensure that the requirement is enforced.
- 5.13 All of the types of development supported by these five policies will require planning permission and since they are located within one or more core areas for one or more Annex II bat species, will therefore undergo Habitats Regulation Assessment at the site level to ensure no adverse impacts on the favourable conservation status of the SAC.

Policies H1, H2 (housing)

- 5.14 H1 supports small scale housing developments in the smaller villages of Gastard and Neston, of up to 12 houses per village. H2 supports brownfield development within the settlement boundary or the smaller villages.
- 5.15 The whole of the Corsham settlement boundary and the villages identified above are within or immediately adjacent to core areas identified in the Bat Special Area of Conservation (SAC) Planning Guidance for Wiltshire Council for all three Annex II species associated with the SAC. Therefore any development which results in loss of foraging or commuting habitat, or loss of roost sites, or loss of function of the habitat and landscape within and between development sites, without mitigation, would cause adverse effects on the SAC features.
- 5.16 Both these policies include the requirement that proposals for these developments must be in accordance with the Corsham Batscapes Strategy, which forms Part 3 of the Corsham Neighbourhood Plan. The Strategy gives clear guidance on measures required to protect and enhance the habitats and features available to bats within the plan area, particularly in regard to habitat connectivity and function throughout the urban landscape.
- 5.17 Since the Strategy forms part of the Corsham NP and since these policies all require adherence to the Strategy, a mechanism is established within the planning system to ensure that the requirement is enforced.
- 5.18 Development supported by these two policies will require planning permission and since they are located within one or more core buffer zones for one or more Annex II bat species, will therefore undergo Habitats Regulation Assessment at the site level to ensure no adverse impacts on the favourable conservation status of the SAC.

Policy L2 (Lifelong Learning)

- 5.19 The policy supports development proposals that would facilitate the expansion of Bath Spa University and other higher and further education and associated infrastructure within the Corsham Neighbourhood Plan Area. It does not specify whether this includes residential accommodation or facility buildings, although it does include the provision of sufficient pedestrian and cycle links and other infrastructure.
- 5.20 Locations for development proposals of this nature are not suggested, however since the whole of the plan area lies within or adjacent to one or more core areas for one or more Annex II bat species, any development which results in loss of foraging or commuting habitat, or loss of roost sites, or loss of

function of the habitat and landscape within and between development sites, without mitigation, would cause adverse effects on the SAC features.

- 5.21 The policy includes the requirement that proposals for these developments must be in accordance with the Corsham Batscapes Strategy, which forms Part 3 of the Corsham Neighbourhood Plan. The Strategy gives clear guidance on measures required to protect and enhance the habitats and features available to bats within the plan area, particularly in regard to habitat connectivity and function throughout the urban landscape.
- 5.22 Since the Strategy forms part of the Corsham NP and since these policies all require adherence to the Strategy, a mechanism is established within the planning system to ensure that the requirement is enforced.
- 5.23 Development supported by these two policies will require planning permission and since they are located within one or more core buffer zones for one or more Annex II bat species, will therefore undergo Habitats Regulation Assessment at the site level to ensure no adverse impacts on the favourable conservation status of the SAC.

Policies T1, T2, T3, (Transport)

- 5.24 T1 supports developments which maintain and/or improve traffic safety and transport services. T2 supports development proposals that include safe pedestrian and cycle routes within the town and connecting villages. T3 proposes to establish the 'Corsham Link' to sustainably connect the town and surrounding villages with the provision of a safe pedestrian/cycle route as shown in **Figure 7** (on page 29).
- 5.25 Safe pedestrian and cycle routes and traffic safety measures usually include a strategic lighting plan. Additional lighting or lighting in areas that are currently dark could result in direct impacts to all three of the Annex II bat species associated with the SAC, since all are extremely light averse. This could mean that established flight lines are rendered unusable for bats and that foraging areas and roosting sites cannot be accessed. This would be likely to result in a major impact at population level.
- 5.26 All three policies require that any proposals for such projects adhere to the Corsham Batscapes Strategy. In addition, Policy T3 (Corsham Link), requires that the route is selected to avoid impacts on areas sensitive for biodiversity or geodiversity.
- 5.27 Since the Strategy forms part of the Corsham NP and since these policies all require adherence to the Strategy, a mechanism is established within the planning system to ensure that the requirement is enforced.
- 5.28 Where planning permission is required for elements supported by these policies, the applications will undergo HRA at the site level.

Assessment of impacts in combination with other plans and projects

- 5.29 The wider landscape around Corsham supports a significant number of habitat features that link to neighbouring community areas, towns and villages where neighbourhood plans are in production or where extant planning permissions and planning applications lie within core areas, in some cases these

are core areas that also include all or part of the Corsham NP area. Examples are the railway line through Corsham which joins that running through Bradford on Avon, areas of natural and semi-natural woodland connected by lightly managed hedgerows, watercourses and to a lesser extent roadways (where they are tree or hedge-lined). Loss of habitat or of habitat function at more than one location within core areas, especially where connected by primary commuting habitat would likely have a combined effect on the conservation objectives of the SAC.

- 5.30 The incorporation into the policies of this NP of the requirement for adherence to the Corsham Batscapes Strategy, will ensure that no adverse effects result from development within the Corsham NP area that could combine with those from plans or projects elsewhere within the zone of influence for the SAC

Conclusion for the Bath and Bradford on Avon Bats SAC

- 5.31 Having assessed the individual policies within the Corsham NDP, I consider that the inclusion within each policy of the requirement to adhere to the Corsham Batscapes Strategy, together with the inclusion of the Strategy as an integral part of the NDP will be sufficient to ensure impacts to bats are avoided or appropriately mitigated. I therefore consider that it is possible to conclude, beyond reasonable scientific doubt, that there would be no adverse effects on the Bath and Bradford on Avon Bats SAC, alone or in- combination with other plans and projects.

Prepared by [REDACTED] Senior Ecologist, Wiltshire Council
30th January 2019