

## **1. SCREENING METHODOLOGY**

Each element of the draft Holt Neighbourhood Plan (NP) has been categorised against the screening criteria developed by Natural England. This process is necessary to help provide a clear audit trail for the assessment and, if necessary, identify the need for the wording of policies to be amended or new policies added to be certain that the NP will not have a significant negative effect on a European site.

The criteria used were 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

The effect of each draft policy has been considered both individually, and in combination. The effects of the whole plan have also been considered in combination with the Wiltshire Core Strategy.

## **2. WILTSHIRE CORE STRATEGY HRA**

The Wiltshire Core Strategy HRA derived a set of parameters by which to determine the likelihood of potential impact on Natura 2000 sites. Applying these parameters to the Holt NP area identifies the following issues to be assessed.

- *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*
- *Hydrology / Hydrogeology - Sites that fall wholly or partly within either the Thames Water (Swindon) and Oxford Water Resource Zone WRZ (SWOX WRZ), or the Wessex Water North WRZ, may be susceptible to impact. (Holt is serviced by Wessex Water North WRZ, so only the two sites listed below are relevant to this Neighbourhood Plan area).*

- *Salisbury Plain SAC and SPA*
- *River Avon SAC*
- *Nitrogen Deposition – Natura 2000 sites within 200m of a main road*
  - River Avon SAC
  - Salisbury Plain SAC / SPA
- *Physical Damage / Interruption of Flight Lines*
  - Bath and Bradford on Avon Bats SAC

### **3. SCREENING OF POTENTIAL IMPACTS**

Draft policies within the emerging Holt NP have been screened against each of the above potential impacts, for each Natura 2000 site (see Section 5 below).

#### *a) Recreation*

**Salisbury Plain SPA/SAC** – The Wiltshire Core Strategy HRA assessed that the issues relating to additional recreational pressure as a result of residential development growth are dealt with sufficiently in the ‘Salisbury Plain SPA HRA and Mitigation Strategy’, which prescribes proportionate developer contributions for development sites within 4km of the western and central areas of the SPA or within 15km of the eastern part of the SPA, to deliver monitoring and adaptive management on the plains (which will be obtained through the Community Infrastructure Levy, CIL). Core Policy 50 of the Wiltshire Core Strategy implements this approach. Holt is located over 4km from the western areas of the Plain, so no Likely Significant Effect (LSE) through recreational impacts is expected.

**River Avon SAC** - an increase in recreational pressure on the European site as a result of implementation of the plan is not expected due to the limited amount of development proposed and the distance from the river. The River Avon SAC is over 5km from the Holt NP area, therefore no LSE through recreational impacts are expected. The nearest river is the Bristol Avon, which is a County Wildlife Site. The Kennet and Avon Canal also lies within the Holt NP area, which provides an existing local resource for recreation.

#### *b) Hydrology/Hydrogeology*

**Water Resources** – The Holt NP area is located within the Bristol Avon catchment and it is expected that any small residential or industrial developments will be accommodated within the existing abstraction license levels. Current licences have undergone HRA by the Environment Agency, as has Wessex Water’s Water Resource Management Plan, therefore the Council is satisfied that the issue does not require further assessment at the NP level, as it will not require any additional abstraction from the SAC catchment.

**Water Quality** – Holt NP area drains to the Bristol Avon River, therefore the NP is not hydrologically connected to any SAC catchments. Issues of water quality, including surface water drainage will be

dealt with through Development Management as described in Core Policy 50. The use of SUDS and suitable pollution control measures will be required for most proposals.

*c) Nitrogen Deposition*

This effect on Natura 2000 sites, as identified in the Wiltshire Core Strategy HRA as being sensitive to adverse impact, in relation to the draft Holt NP has been considered and due to the scale and location of the allocated sites relative to any Natura 2000 site, any effects of nitrogen deposition arising from the proposed development would be *de minimis*.

*d) Physical Damage/Interruption of Flight Lines*

The eastern side of the Holt NP area lies within the greater horseshoe bat core area as identified in the Core Strategy HRA in relation to the Bath & Bradford on Avon Bat SAC. The draft Holt NP allocates the Old Tannery Site for mixed use re-development, which occurs approximately 90 metres from the boundary of the greater horseshoe bat core area, so loss of habitat may result in physical damage to roosts and interruption of flight lines. However, a Bat Survey Report by Engain dated 30<sup>th</sup> October 2014 for the Old Tannery Site has been shared with the Council for the purpose of this HRA. No horseshoe roosts were found during this survey, but horseshoe bats were recorded foraging/commuting through the site. Mitigation will therefore be required with regard to the retention of key flight lines, landscaping proposals and a sensitive lighting strategy. The re-development of the site would also provide an opportunity to incorporate suitable roosts for horseshoes as a biodiversity enhancement in accordance with paragraph 118 of the National Planning Policy Framework.

#### **4. SCREENING OF EMERGING HOLT NEIGHBOURHOOD PLAN POLICIES**

The draft Holt NP has five sections containing policies and tasks. These are:

- Section 1: Housing
- Section 2: Traffic, Parking and Transport
- Section 3: Commercial and Economic Development
- Section 4: Environment, Energy and Green Spaces
- Section 5: Community Amenities

All parts of the draft plan have been screened for potential impacts upon the Natura 2000 network, including policies and tasks, as set out in Section 5 below.

Where policies are 'screened in' and highlighted in red in the following table (section 5), recommendations are made to the NP steering group. These recommendations are made in order to satisfy the HRA and therefore must be added to the draft NP before its submission for adoption.

5. INITIAL HABITATS REGULATIONS SCREENING ASSESSMENT OF THE DRAFT HOLT NEIGHBOURHOOD PLAN

a) Screening assessment of individual policies

Categories A / B (Green) – Screened out

Categories C / D (Red) – Screened in

Policy Area	Policy	Categorisation in initial screening	Comments and recommendations
Housing	H1.1 Supports the development of housing on the Tannery site subject to specific provisions for area, mixed-use, types of housing, affordable housing, ownership, design standards, contamination and concomitant infrastructure delivery (including the village school)	B	<p>The re-development of the Tannery Site has the potential to impact on bats linked to the Bath and Bradford on Avon Bats Special Area of Conservation (SAC). The NP must refer to the SAC and recognise the need for mitigation for bats as part of the re-development of the site to ensure no Likely Significant Effect (LSE). Bat surveys were carried out at the site by Engain in 2014 and the results have been shared with the council for this HRA. No horseshoe bat roosts were found during the survey, but low numbers of Greater and Lesser horseshoe bats were recorded foraging/commuting through the site. With appropriate mitigation agreed as part of a planning application, which retains foraging/commuting routes through the site through the sensitive design of the layout, landscaping proposals and a sensitive lighting scheme, the re-development of the site would not have a significant effect.</p> <p><b>Recommendation to the NP steering group: Add the following wording to this policy – ‘The existing buildings within the Tannery Site could become occupied by roosting bats, therefore applications for demolition and re-use or re-development of the</b></p>

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Policy Area	Policy	Categorisation in initial screening	Comments and recommendations
			<p><i>site will be accompanied by an up to date bat survey (within 12 months of a planning application) and appropriate mitigation provided where necessary, having regard to the Council's Habitats Regulations Assessment (HRA) guidance document for the Bath and Bradford on Avon Bats Special Area of Conservation (SAC). The results of a 2014 bat survey by Engain show that mitigation for commuting and foraging horseshoe bats will be required, including retention of key flight paths through the sensitive design of the site layout, landscaping proposals and a sensitive lighting strategy.'</i></p> <p><b>Other recommendations:</b></p> <ul style="list-style-type: none"> <li>• Add the Bat Survey Report by Engain dated 30<sup>th</sup> October 2014 to the list of "Key Supporting Evidence" (page 22)</li> <li>• Reference CP50 Biodiversity and Geodiversity (page 22) in the Wiltshire Core Strategy relevant policies section.</li> </ul>
	H1.2 Supports the provision of affordable housing	A1	
	H1.3 Affordable housing occupancy	A1	
	H2.1 Good quality design and generous provision of open green spaces that are accessible to the public	A1	
	H3.1 Infill housing	A1	
	H3.2 Does not support housing on greenfield sites	A3	
	H3.3 Supports conversion of redundant agricultural buildings to housing	B	The potential for roosting horseshoe bats that are linked to the Bats SAC should be recognised in the NP. The following wording

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			<p>should be added to the policy to recognise the potential impact on roosting bats where buildings are suitable for horseshoe access.</p> <p><b>Recommendation to the NP steering group: Add the following wording to the policy – ‘Disused and underused buildings within the village and surrounding rural area could become occupied by roosting bats, therefore applications for demolition and re-use or re-development of such buildings will be accompanied by a bat survey and appropriate mitigation provided where necessary, having regard to the Council’s Habitats Regulations Assessment (HRA) guidance document for the Bath and Bradford on Avon Bats Special Area of Conservation (SAC).’</b></p>
Traffic, Parking and Transport	T.1 Supports changes to the B3107 to mitigate impact of vehicular traffic on the village	A1	
	T.2 Appropriate and suitable provisions will be required to accommodate the traffic that will be generated during the construction and occupation of the development of the Tannery site	A1	
	T.3 Supports proposals that would re-route HGV traffic away from the village	A1	
	Task T.2 Relocate the northern pavement by the recreation ground inside the hedge (see map on p.28)	B	<p>This could potentially have an impact on foraging habitat or a commuting route used by horseshoe bats linked to the BBOA Bats SAC. It seems apparent that the hedgerow would be retained, but if not, bat activity surveys may be required and further advice on this potential “task” should be obtained from the Council’s Ecologists (Landscape and Design Team, Economic Development and Planning). The impact of lighting would also</p>

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			<p>need to be considered.</p> <p><b>Recommendation to the NP steering group: Add the following wording to the task – ‘The hedgerow could be a flight path for horseshoe bats and will be retained. However, if the hedgerow needs to be removed or translocated to a new position, or if additional lighting is required, the Council Ecologist will be contacted for advice, as a bat survey may be necessary to inform appropriate mitigation, having regard to the Council’s Habitats Regulations Assessment (HRA) guidance document for the Bath and Bradford on Avon Bats Special Area of Conservation (SAC)’.</b></p>
	P.1 Commercial and housing developments must be self-sufficient in terms of off-road parking	A1	
	P.2 Road improvements to the western junction of The Midlands with The Street resulting from plans for The Tannery should include facilities for short term parking outside the village shop	A1	
	OT.1 Supports development proposals including safe cycling routes within the village and providing appropriate contributions towards provision of links to other communities and improvements to the National Cycling Network	A1	

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Commercial and Economic Development	CE.1 Supports development of new B1 businesses on the Midlands Light Industrial Site	A1	
	CE.2 Supports the commercial development of the Tannery site	B	As above, the re-development of the Old Tannery Site has the potential to impact on bats linked to the BBOA Bats SAC. The NP must refer to the SAC and recognise the need for mitigation for bats as part of the re-development of the site to ensure no LSE. Bat surveys were carried out at the site by Engain in 2014 and the results have been shared with the council for this HRA. No horseshoe bat roosts were found during the survey, but low numbers of Greater and Lesser horseshoe bats were recorded foraging/commuting through the site. With appropriate



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			<p>mitigation agreed as part of a planning application, which retains foraging/commuting routes through the site through the sensitive design of the layout, landscaping proposals and a sensitive lighting scheme, the re-development of the site would not have a significant effect.</p> <p><b><u>Recommendation to the NP steering group: Add the following wording to this policy</u></b> – <i>‘The existing buildings within the Tannery Site could become occupied by roosting bats, therefore applications for demolition and re-use or re-development of the site will be accompanied by an up to date bat survey (within 12 months of a planning application) and appropriate mitigation provided where necessary, having regard to the Council’s Habitats Regulations Assessment (HRA) guidance document for the Bath and Bradford on Avon Bats Special Area of Conservation (SAC). The results of a 2014 bat survey by Engain show that mitigation for commuting and foraging horseshoe bats will be required, including retention of key flight paths through the sensitive design of the site layout, landscaping proposals and a sensitive lighting strategy.’</i></p> <p><b><u>Other recommendations:</u></b> The Bat Survey Report by Engain dated 30th October 2014 should be added to the list of “Key Supporting Evidence” (page 22) and the relevant policies from the Wiltshire Core Strategy section should also reference CP50 Biodiversity and Geodiversity (page 22).</p>

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Policy Area	Policy	Categorisation in initial screening	Comments and recommendations
	CE.3 Requires concomitant development of infrastructure to support business expansion	A1	
	CE.4 Supports the conversion of redundant farm buildings for small business use	B	<p>The potential for roosting horseshoe bats that are linked to the Bats SAC should be recognised in the NP. The following wording should be added to the policy to recognise the potential impact on roosting bats where buildings are suitable for horseshoe access.</p> <p><b>Recommendation to the NP steering group: Add the following wording to the policy – ‘Disused and underused buildings within the village and surrounding rural area could become occupied by roosting bats, therefore applications for demolition and re-use or re-development of such buildings will be accompanied by a bat survey and appropriate mitigation provided where necessary, having regard to the Council’s Habitats Regulations Assessment (HRA) guidance document for the Bath and Bradford on Avon Bats Special Area of Conservation (SAC).’</b></p>

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Policy Area	Policy	Categorisation in initial screening	Comments and recommendations
Environment, Energy and Green Spaces	E.1 Supports proposals for new development where environmental provision is made such as open green spaces, safe play areas, retention of existing trees and hedges, new tree planting, cycleways and pedestrian friendly routes, and green energy	A3	
	E.2 Supports proposals for new development where they would address impacts on energy and water supply, drainage, waste disposal, traffic and transport routes, and the school	A1	
	EN.1 Supports installation of renewable energy projects and energy efficiency measures	A1	
	EN.2 Supports proposals for renewable and low carbon energy generation	A1	
	Task GS.2 Seek to establish a recognised and accessible riverside walk alongside the River Avon	B	The River Avon (Bristol) is a recognised foraging and commuting route for bats linked to the BBOA Bats SAC. It is also a County Wildlife Site.

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			<p><b>Recommendation to the NP Steering Group:</b>            Add the following wording to the task – ‘The River Avon is an important commuting route for horseshoe bats and a County Wildlife Site. The riverside walk will therefore be sensitively designed to ensure bats can continue to use the river corridor and to minimise impact on the County Wildlife Site. The Council Ecologist will be contacted for advice, as an ecological survey may be necessary to inform appropriate mitigation, having regard to the Council’s Habitats Regulations Assessment (HRA) guidance document for the Bath and Bradford on Avon Bats Special Area of Conservation (SAC) and Core Policy 50 of the Wiltshire Core Strategy’.</p>
	Task GS.3 Secure, maintain and improved open green spaces in and around the village	A3	<p>Note: if the NP would like to secure valued green spaces identified in Section 4.3 in perpetuity, they should consider the use of a ‘Local Green Space’ designation. This is a strict designation and the group would have to demonstrate that any site selected meets the requirements of the NPPF paragraphs 76-77.</p>

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Community Amenities	CA.1 Identify and register assets to ensure retention and protection in future, including village hall, etc.	A3	
	Task CA.2 Establish priorities, which could include: additional facilities for young people, allotments, improvements to sports pavilion and a new village hall or community centre.	A3	Sports pavilions and other buildings could be suitable for roosting horseshoe bats. <b>Recommendation to the NP steering group: Add the following wording to the policy – ‘Please note that disused and underused buildings within the village and surrounding area could become occupied by roosting bats, therefore applications for demolition and re-use or re-development of such buildings should be accompanied by a bat survey and appropriate mitigation provided where necessary, having regard to the Council’s Habitats Regulations Assessment (HRA) guidance document for the Bath and Bradford on Avon Bats Special Area of Conservation (SAC).’</b>

**b) Assessment of all elements of the plan ‘in combination’**

- The draft policies would not have any in combination effects.

**c) Assessment of the effects of the plan as a whole, in combination with Wiltshire Core Strategy and other plans or projects**

- The draft plan would not have any in combination effects with the Wiltshire Core Strategy or any other plans or projects.

**6. CONCLUSION**

The draft policies in the emerging Holt NP include an allocation for mixed use development at the Old Tannery Site. A bat survey carried out in 2014 did not find any evidence of horseshoe roosts; however, foraging and commuting horseshoes were recorded through the site. Mitigation including sensitive layout, landscaping proposals and lighting, will be required and are detailed matters which should be dealt with through the development management process, at which point the application will be subject to a further, more detailed HRA. With mitigation, it is concluded that the re-development of the Old Tannery Site would have no likely significant effects upon Natura 2000.

**It should be noted, however, that a future planning application for the Old Tannery Site would need an updated bat survey to ensure that the information is not more than 12 months old.**

There are also a few other policies and tasks that could have impacts on horseshoe bats, including the conversion of farm buildings and the possible removal of a hedgerow to facilitate a pedestrian footpath. Bat surveys are likely to be required to inform these either as applications, notifications of prior approval or projects that the Council Ecologist will advise on. With mitigation, these are unlikely to have significant effects on Natura 2000.

It can therefore be concluded that the draft Holt NP would have no LSE upon the Natura 2000 network alone or in combination and no appropriate assessment is currently required.

**Once the recommendations made in Section 5 of this report have been added to the NP, the Council Ecologist should be sent a copy for final approval before the plan is adopted.**

Assessment carried out by: [REDACTED]

With comments from: [REDACTED]  
[REDACTED]

Date: 26<sup>th</sup> January 2016