

SOUTHWICK NEIGHBOURHOOD PLAN HABITATS REGULATIONS ASSESSMENT (HRA)

1. Introduction

- 1.1. This first iteration of the HRA relates to the Southwick Neighbourhood Plan 2018-2016 Screening Draft dated August 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 Southwick 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.

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;

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

- 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
 - 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

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

- 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. While recreational pressure is a known risk for the Salisbury Plain SPA, risks for the SAC habitat features were screened out of appropriate assessment for the Core Strategy on the advice of Natural England.
- 3.3 In terms of hydrology/hydrogeology, Southwick, which 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 housing site allocations in the Southwick NDP allow for about a further 40 dwellings which is considered to be a 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 and Salisbury Plain SAC/SPA are a considerable distance from the NDP area and effects are likely to be negligible. In relation to these sites the Wiltshire Core Strategy HRA concluded no likely significant effect where the existing approach to mitigation in Core Policy 55 is implemented. It is concluded that the proposals for housing in this NDP 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.

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

- 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 HRA screened all six allocations at Trowbridge into appropriate assessment in relation to the Bath and Bradford on Avon Bat SAC, including H2.6 Southwick Court. The assessment was concerned specifically with the potential for development to lead to increased recreational pressure and physical damage/interruption of flight lines/disturbance in areas which lie outside the SAC but which are functionally related to it.
- 3.9 One of these allocations, Land off the A363 at White Horse Business Park, was also screened into appropriate assessment for Salisbury Plain SPA as it lies within a 6.4km radius of the Plain. The majority of visitors to the plain are expected to live within this distance.

4. Screening of Policies in Southwick Neighbourhood Plan Screening Draft August 2018

- 4.1 The Southwick NDP comprises 7 planning policies and 3 informal non-planning policies.
- 4.2 Taking into consideration the location, scale and nature of proposals in the NDP, the two European Sites where there is a mechanism for effect are the Bath and Bradford on Avon Bats SAC and Salisbury Plain SPA. All parts of the draft plan have been screened for potential impacts which may arise from the plan alone or in combination with other plans and projects. Five policies have the potential to give rise to significant effects and are therefore taken forward to appropriate assessment in sections 5 and 6 below.
- 4.3 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	Initial screening Category	Issue	Screening category after changes recommended by appropriate assessment
Policy 1: Landscape Setting and Proposed Housing Site at Southwick Court	B for Bats SAC	The NDP policy seeks to preserve and enhance the landscape setting of Southwick. Development in the open space between the village and Trowbridge settlement boundary is not supported by the NDP. The plan introduces two additional criteria to be met by 'exception' sites before they can be permitted in this Landscape Gap. It is clear that exception sites are not being promoted by this policy and therefore it will not lead to significant effects. The HSAP allocation H2.6 Southwick Court is supported provided there is adequate screening between the site and Southwick village and connections are made into the existing rights of way network. Any risks generated by these provisions are within the scope of the Councils mitigation approach for the Bats SAC and can therefore be expected to be assessed through the project level HRA.	
	B for Salisbury Plain SPA	Southwick Court lies beyond the visitor zone for Salisbury Plain.	
Policy 2: Housing (General)	D for Bat SAC	This policy seeks to control the scale of future development to small and medium-sized sites of up to about 40 homes. Although no specific sites are identified, most of the NDP area lies within a zone of medium risk for the Bath and Bradford on Avon Bats SAC and therefore development throughout the plan area has the potential to affect the SAC in combination with other development.	B

Policy	Initial screening Category	Issue	Screening category after changes recommended by appropriate assessment
	D for Salisbury Plain SPA	Approximately 15% of the NDP area lies within a 6.4 km radius of Salisbury Plain SPA. Therefore the potential for significant effects exists on this N2K site.	B
Policy 3: Housing (Sites)	C and D for Bats SAC	2 sites are allocated by the NDP: Land North West of Frome Road and Land between Lewis Court and Berryfield Farm. Together they would contribute in the order of 40 dwellings on greenfield sites. A further site is proposed to come forward to the rear of 6A Frome Road for about 9 dwellings as part of a future plan review. All three sites lie within a zone of medium risk for the Bath and Bradford on Avon Bats SAC.	B
	B for Salisbury Plain SPA	None of the three sites lie within a 6.4 km radius of Salisbury Plain and therefore they would not give rise to significant effects on the SPA.	
Policy 4: Retail and Services	B for bats SAC	Proposals for community facilities and additional services will be supported subject to criteria for noise, traffic and parking being met. The nature of such proposals could vary widely and it is therefore difficult to anticipate their implications for the bats SAC. For the most part proposals are expected to be small in scale and would more appropriately be considered by a project specific HRA. Most proposals are likely to be located within the settlement boundary which lies outside bat sensitivity zones.	
	B for Salisbury Plain SPA	Retail and service facilities will not themselves increase the number of visitors to Salisbury Plain.	
Policy 5: Bat Conservation Policy	A1 and A2 for Bats SAC B for Salisbury	This policy seeks to avoid harm to bats and their habitat and as such does not lead to significant effects on either European site. However in not mentioning the TBMS, it is not adequate to overcome the issues for the Bats SAC identified in policies 2, 3 and 6. It is essentially duplicating Core Policy 50 in the WCS.	

Policy	Initial screening Category	Issue	Screening category after changes recommended by appropriate assessment
	Plain SPA		
Policy 6: Infrastructure and Developer Contributions	C and D for Bats SAC	This policy sets out the community's priorities for spending on local infrastructure. While largely benign and potentially beneficial for bats, improvements to sustainable transport such as lighting paths and cycleways, could lead to impacts on the Bath and Bradford on Avon SAC if lighting incidentally illuminated habitats used by SAC bat species for foraging, commuting or roosting.	B
	B for Salisbury Plain SPA		
Policy 7: Local Green Space	B for Bats SAC B for Salisbury Plain SPA	Southwick allotments are proposed as a Local Green Space.	
Non-planning policy A	B for Bats SAC B for Salisbury Plain SPA		
Non-planning policy B	B for Bats SAC B for Salisbury Plain SPA		

Policy	Initial screening Category	Issue	Screening category after changes recommended by appropriate assessment
Non-planning policy C	B for Bats SAC B for Salisbury Plain SPA		

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 Southwick 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 Winsley approximately 7km from Southwick village. Others occur near Box and Bath. The mines are mainly used by bats during the winter and autumn.
- 5.3 While the SAC lies some distance from Southwick 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. 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, Green Lane and Biss Woods, and Picket and Clanger Woods are all core roosts for Bechstein's bats. Although the core areas around these roosts do not extend into the NDP area, it is likely Bechstein's bats at the very least commute through it to swarming and hibernation sites at Box and Bath. This species cannot be identified from bat detectors and this is likely to explain the absence of records from the Southwick area. One only record exists, that of a roosting bat found during arboricultural work at Southwick Country Park.
- 5.5 There are a large number of records of greater horseshoes foraging / commuting across Pole's Hole Farm south of Southwick village as a result of systematic surveys carried out in the last few years. However there are no records for elsewhere in the NDP area which is undoubtedly due to a lack of survey as the landscape at Pole's Hole's Farm is replicated across much of the NDP area. While the NDP area is likely to be important for foraging and commuting, the only roost records currently available lie just outside the NDP boundary but key potential roost sites may yet be un-surveyed. The northwest and southern parts of the plan area fall within core areas for this species. Interestingly Pole's Hole Farm lies in the intervening gap.
- 5.6 It is a similar pattern for records of foraging, commuting and roosting lesser horseshoe bats and likewise it can be assumed this species makes much greater use of the NDP area than the records suggest. None of the core areas for lesser horseshoes extend into the Southwick NDP area.

Plans and Projects to be considered in-combination

- 5.7 The screening Assessment found that the Southwick 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 15/04736/OUT Ashton Park, Trowbridge

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

- Application 16/04468/OUT land South West of Ashton Road, Trowbridge
- Application 16/00547/FUL Land SE of Southview Park, Trowbridge
- Application 17/12509/FUL Land SE of Southview Park, Trowbridge
- Application 18/00985/OUT The Grange, Hilperton
- Application 16/00672/OUT Land W of Elizabeth Way, SW of Hilperton Marsh, Trowbridge
- Application 17/09961/OUT Land West Of Biss Farm, West Ashton Road, Trowbridge
- Permission 13/06879/OUT Land South of Devizes Road, Hilperton
- Permission W/11/01932/REM Land North East of Green Lane Farm, Trowbridge (completed)
- Permission W/04/02105/OUTES Land adjacent to scrapyard, Trowbridge (completed)
- Application 18/02671/FUL Sunnyside Yarnbrook Road
- Application 18/10035/OUT Land south of Church Lane, Upper Studley, Trowbridge

HRA for the Wiltshire Housing Site Allocations Plan pre-submission draft

- 5.8 The HRA for the Wiltshire Housing Site Allocations Plan pre-submission draft included an appropriate assessment of the six allocations proposed for Trowbridge and this has now been supplemented by an Addendum HRA (September 2018).
- 5.9 The HRA and its addendum concluded that allocations would not lead to an adverse effects alone or in-combination with other plans and projects provided that:
- Sensitive habitat features are retained and buffered by wide, dark, continuous habitat corridors;
 - Other bat habitat e.g. grazing/arable land, is fully offset by creating new high quality bat habitat within the application boundary;
 - Developments contribute to strategic mitigation offsite, to be delivered by Wiltshire Council, to address residual in-combination habitat impacts, and;
 - Developments contribute to measures to offset in-combination increases in recreational pressure at publicly accessible woodlands used by breeding Bechstein's bats.
- 5.10 Mitigation criteria for retaining and buffering habitat within green field sites will be detailed in the Trowbridge Bat Mitigation Strategy (TBMS) which the Council is preparing in consultation with Natural England and is well advanced. The Strategy will also detail specific mitigation measures to address in-combination effects on habitats and these will be secured with appropriate developer contributions and implemented through a scheme run by the Council.
- 5.11 The TBMS is supported by a study investigating recreational use of publicly accessible open spaces including the woodlands south of Trowbridge used by roosting Bechstein's bats. The findings suggest that residents from this NDP area do not tend to visit the woodlands used by Bechstein's bats. Rather they are most inclined to visit Southwick County Park.
- 5.12 The TBMS is intended to address impacts arising from the quantum of development coming forward from three categories of development: (i) allocations in the HSAP, (ii) allocations in Neighbourhood Plans and (iii) windfall development within existing settlement boundaries. It is anticipated it will identify zones of sensitivity for a) bat habitat and b) generating recreational pressure at woodlands used by Bechstein's bats. The whole of the Southwick NDP area is likely to fall within a zone of medium sensitivity for damaging bat habitat with the consequence that any greenfield development outside Southwick village settlement boundary could conflict with the conservation objectives for all three SAC bat species when considered in-combination with other developments. In addition, the eastern half of the NDP area is likely to fall within a zone of medium risk for generating recreational pressure at the Bechstein's roost sites. New dwellings within this zone are therefore anticipated to lead to increased recreational pressure in-combination with other new development in and around Trowbridge.

Analysis of policies in the NDP screened into appropriate assessment

Policy 2: Housing (General)

- 5.13 The quantum and location of development which could come forward as a result of this policy may be in conflict with Wiltshire Council's TBMS for mitigating impacts to the Bath and Bradford on Avon Bats SAC. The policy seems to suggest that further schemes could be supported by the plan on green field sites in addition to those identified as site allocations in Policy 3.
- 5.14 The TBMS only mitigates for such "windfall" schemes if they are located within existing settlement boundaries where the loss of bat habitat will be minimal. The Council's Strategy seeks to ensure that the loss of green field land is fully mitigated and to this end it has identified a specific quantum of off-site mitigation to deal with residual in-combination effects. It is not certain that the strategy could be extended to cover windfall development on green field land.
- 5.15 Windfall development within settlement boundaries has the potential to lead to recreational pressure on woodland sites used by Bechstein's bats. It seems such risks will be low for much of the Southwick NDP area given the proximity of the country park but nevertheless, contributions will be taken for those dwellings falling within the zone assessed from visitor data to be generating recreational pressure. For the sake of clarity and consistency with other plans therefore, I recommend that wording is included to cover this.

Recommendation for Policy 2: Housing (General)

The wording in Policy 2 should be amended to clarify that windfall developments will only be supported where they come forward within the Southwick Village settlement boundary.

The following text should be inserted within the supporting text for this policy:

"The Bath and Bradford on Avon Bats SAC is a constraint to development on green field land within the neighbourhood plan area. While development coming forward for allocation sites identified in this plan is accommodated by Wiltshire Council's bat mitigation strategy for Trowbridge, further windfall development on greenfield land is unlikely to be in accordance with the Habitats Regulations. Where development, either greenfield or within the Southwick Village settlement boundary, has the potential to lead to recreational pressure on woodlands to the south of Trowbridge, mitigation measures in the Trowbridge Bat Mitigation Strategy will be funded by developer contributions taken either from CIL or Section 106 agreements."

Policy 3: Housing (Sites)

- 5.16 Three sites are identified by this policy.
- (i) Land North-West of Frome Road is an allocation for 25 dwellings on 0.84 ha
 - (ii) Land between Lewis Court and Berryfield Farm is an allocation for 15 dwellings on 0.487 ha.
 - (iii) In addition Land to the Rear of 6a Frome Road is identified as being potentially suitable for housing as part of a future plan review.

By virtue of the fact of being located on green field land within the zone of medium risk for impacting bat habitat, all three sites would lead to loss of bat habitat and would cause recreational pressure on the woodlands used by Bechstein's bats. In addition, sites (i) and (iii) are located immediately adjacent

to Southwick Country Park which is presumed to be used by all three SAC bats for foraging and commuting and by Bechstein's bats for roosting.

- 5.17 Any new housing coming forward on green field land must by criteria defined in the TBMS to offset habitat loss. Broadly speaking, these are as follows:
- a) Sensitive habitat features on / adjacent to allocation sites will be retained and buffered from development (including residential gardens) by wide, dark (<1 lux), continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by SAC bats;
 - b) Development will deliver new habitats to offset in-combination habitat losses due to the effect of ongoing urbanisation at a landscape scale, and;
 - c) Development will deliver measures to offset in-combination increases in recreational pressure which are likely to occur at publicly accessible woodlands used by breeding Bechstein's bats
- 5.18 While b) and c) are expected to be delivered through CIL, it is expected that a) will be achieved through on site measures and this will considerably reduce the housing capacity of allocation sites. In this context, the quantum allocated at sites (i) and (ii) and projected for site (iii) is not likely to be achievable at a density of 30 units per hectare as this leaves no land available for mitigation. In the Wiltshire Housing Site Allocations Plan, the minimum allowance for green space/on-site mitigation for allocations is 34%, the maximum is 74%. Given that sites (i) and (iii) lie immediately adjacent to Southwick Country Park the allowance for on-site mitigation is likely to be towards the higher end of this range.
- 5.19 It is expected that the NDP allocations will need to be designed in full compliance with the guidance contained in the TBMS for both habitat and recreational impacts. As the TBMS will exercise significant control over designs coming forward, I recommend that policy wording is amended to draw attention to this matter.

Recommendation for Policy 3: Housing (Sites)

The quantum of housing allocated at sites (i) and (ii) and referred to for site (iii) should be revised downwards to ensure that adequate land (at least 50%) is available within the sites for onsite mitigation in line with the requirements of the TBMS.

Land North-West of Frome Road, replace Policy Requirement 4 with:

"In view of the risks this development presents to the SAC, this development will be expected to be surveyed, designed and mitigated in full accordance with the Trowbridge Bat Mitigation Strategy. Full mitigation for loss of habitats must be achieved within the application boundary."

Land between Lewis Court and Berryfield Farm, replace Policy Requirement 4 with:

"In view of the risks this development presents to the SAC, this development will be expected to be surveyed, designed and mitigated in full accordance with the Trowbridge Bat Mitigation Strategy. Full mitigation for loss of habitats must be achieved within the application boundary."

Policy 5: Bat Conservation Policy

- 5.20 This policy is not screened into appropriate assessment. However I have recommended new wording for the policy itself as it does not reflect the new requirements of the TBMS which effectively updates CP50 in respect of Trowbridge and the Bath and Bradford on Avon Bats SAC.

Recommendation for Policy 5: Bat Conservation Policy.

Policy wording - I recommend this is replaced with the following:

“The entire NDP area falls within a zone of medium sensitivity for species of bats which are features of the Bath and Bradford on Avon Bats SAC. All Planning applications will therefore need to comply with guidance on survey and mitigation contained in the Trowbridge Bat Mitigation Strategy.”

Policy 6: Infrastructure and Developer Contributions

- 5.21 This policy can be expected to be widely supported as it provides for community facilities and better access. This broad support may however mean their potential to adversely affect bats is overlooked and this presents a residual risk for the SAC.
- 5.22 I have therefore recommended wording for inclusion in the supporting text to deal with potential effects arising as a result of policy 6.

Recommendation for Policy 6: Infrastructure and Developer Contributions

Supporting text - I recommend the following wording is added (perhaps after para 8.38):

“Schemes to improve public facilities and access routes may also lead to impacts on bats, especially where these lead to increased lighting, such as floodlighting of sports pitches, or changes to the extent or management of hedgerows e.g. for improvements to footpaths and cycleways. Any such proposals should consider the guidance contained in the Trowbridge Bat Mitigation Strategy and planning applications will need to demonstrate there will be no adverse effect on bats from the application alone and in-combination with other development. Poorly sited developments may be refused but carefully designed schemes making use of modern lighting techniques and equipment as illustrated in the above strategy, may bring improvements on sustainable transport routes for both people and bats.”

Conclusion for the Bath and Bradford on Avon Bats SAC

- 5.23 Provided that the recommendations above are incorporated into the NDP, I 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.

6 Appropriate Assessment – Salisbury Plain SPA

Background to the Salisbury Plain SPA

- 6.1 Salisbury Plain SPA encompasses a plateau of chalk grassland, which supports the following SPA features: breeding common quail, Eurasian hobby, stone-curlew and non-breeding hen harrier. Details of the conservation objectives are available online <http://publications.naturalengland.org.uk/publication/5745803545018368>. The current version is dated 30 June 2014. More recently Natural England has published Supplementary Advice on conserving and restoring the site features⁸ and this is available from the same weblink. This recognises that often active and ongoing conservation management is needed to protect, maintain and restore the function of

⁸ Supplementary Advice on Conserving and Restoring Site Features: Salisbury Plain Special Protection Area (SPA) Site Code UK9011102 dated 27 October 2017

supporting habitat both within and outside the SPA in order to sustain the stone curlew population. The MoD estate and other landowners through Environmental Stewardship are actively involved in delivering these measures.

- 6.2 Evidence from research has demonstrated that stone-curlew is particularly susceptible to recreational pressure. Mitigation for the impacts of the Core Strategy was agreed with Natural England in 2012 and comprised Council funding for monitoring breeding bird numbers and liaising with farm managers to maximise breeding success. As a consequence, the HRA for the Core Strategy which was supported by a strategic HRA for housing development⁹ was able to conclude no adverse effect.

Plans and projects to be considered in combination

- 6.1 The screening assessment in section 4 above found that the Southwick NDP would not lead to significant effects on the Salisbury Plain SPA alone. Impacts would only occur in combination with other plans and projects. The following plans and projects have been taken 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
 - Army basing Programme delivering 917 dwellings at 4 sites in close proximity to the Plain

HRA for the Wiltshire Housing Site Allocations Plan pre-submission draft

- 6.3 Evidence from a visitor survey commissioned by the Council in 2015 demonstrated that 75% of visitors accessing the plan lived within 6.4km of the SPA boundary and 1% of the population within that distance would be expected to visit on a regular basis. Using these findings the HSAP HRA¹⁰ calculated that the housing sites plan would increase visitor numbers to the Plain by 1% over the estimates calculated for the Core Strategy. This figure incorporated a number of precautionary assumptions to counteract any constraints of the data used. Taking the favourable condition of the SPA into consideration, it was considered that existing mitigation measures in place for the Core Strategy would continue to provide an effective, timely and reliable means of mitigating any additional effects from the HSAP should they arise.

Analysis of policy 2 in the NDP screened into appropriate assessment

- 6.4 This policy anticipates growth coming forward within the overall limits of scale set out by the Wiltshire Core Strategy and NPPF. It goes on to stipulate that acceptable schemes are unlikely to be larger than around 40 homes.
- 6.5 The part of the NDP area which lies within 6.4 km of Salisbury Plain SPA lies outside the limits of large and small villages and comprises almost exclusively farm complexes. As such it is unlikely that development will come forward in this area other than as rural exception sites for very small numbers of dwellings. The current mitigation scheme will therefore be adequate to ensure no effects on the Salisbury Plain SPA.

⁹ HRA and Mitigation Strategy for Salisbury Plain SPA (in relation to recreational pressure from redevelopment), Wiltshire Council, 30 March 2012

¹⁰ HRA and Mitigation Strategy for Salisbury Plain SPA (in relation to recreational pressure from residential development), Wiltshire Council, reviewed in May 2018

Recommendation for Policy 2: Housing (General)

The policy does not give rise to adverse effects. No changes are required to wording of the policy or supporting text.

Conclusion for the Salisbury Plain SPA

- 6.6 I consider that no changes are required to the NDP in order to conclude, beyond reasonable scientific doubt, that there would be no adverse effects on the Salisbury Plain SPA, alone or in- combination with other plans and projects.

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