Appropriate Assessment of Effects on a European Site

This is a record of the appropriate assessment of Wiltshire Council required by Regulation 63 of the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. The project has been assessed as likely to have significant effects on one or more European protected sites and is not directly connected to or required for the management of such sites. This assessment is made in accordance with the relevant guidance documents (ref. *HRA Handbook*, David Tyldesley Associates).

PART A: INFORMATION REVIEWED	
Information about the plan or project	Address: Site 2 Trenchard Lines, York Road, Upavon, Pewsey. An application (PL/2023/10827) under Regulation 77 of the Conservation of Habitats and Species Regulations has been made to progress Site 2 of the MODs scheme for the replacement and upgrading of Single Living Accommodation (SLA) at Trenchard Lines. This AA is for the Regulation 77 application only, please refer to separate planning applications PL/2022/09190 and PL/2022/09191 for information on the remaining scheme. **River Avon SAC** The report 'Site 2, Tenchard Lines, Upavon Application Under Regulation & of the Conservation of Habitats and Species regulations (Arcadis, November 2023)' has been submitted with the application. The report states that '*The proposed development of Site 2 consists of the demolition of two existing SLA buildings (184 and 399) and their replacement with two new buildings, providing a greatly improved standard of accommodation. The new buildings will provide 34 more bedspaces than the existing*.' As a result the application has been screened into Appropriate Assessment (AA) for impacts on the River Avon SAC due to increase in nutrient (phosphorus) burden. **Salisbury Plain SPA** This application lies within the 6.4km buffer zone of the Salisbury Plain SPA and in light of the HRA for the Wiltshire Core Strategy and the HRA for the Wiltshire Housing Site Allocations Plan it is screened into Appropriate Assessment due to the potential impact of recreational pressure on stone curlew in combination with other plans and projects. Please refer to AA in comments from ecology dated 15/04/2023. Salisbury Plain SPA is not considered further in this AA.
Natura 2000 site(s)	River Avon SAC
List of European Site interest features and Conservation Objectives	Qualifying Features: Annex 1 Habitat Type • Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitricho-Batrachion* vegetation; Rivers with floating vegetation often dominated by water-crowfoot

	Annex II Species • *Vertigo moulinsiana*; Desmoulin`s whorl snail • *Petromyzon marinus*; Sea lamprey • *Lampetra planeri*; Brook lamprey • *Salmo salar*; Atlantic salmon • *Cottus gobio*; Bullhead The conservation objectives for the site are: Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; ➢ The extent and distribution of qualifying natural habitats and habitats of qualifying species; ➢ The structure and function (including typical species) of qualifying natural habitats; ➢ The structure and function of the habitats of qualifying species; ➢ The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely; ➢ The populations of qualifying species, and, ➢ The distribution of qualifying species within the site. European Site Conservation Objectives for River Avon Special Area of Conservation Site Code: UK0013016 published by Natural England 27 November 2018 (Version 3)
Information about the SAC	The River Avon is one of the most diverse chalk streams in the UK, with over 180 species of plants, one of the most diverse fish faunas, and a wide range of aquatic invertebrates. The River Avon Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC) includes a number of rivers and adjacent habitats. Conservation objectives for the SAC and supplementary advice for implementing them have been published by Natural England (NE)[1,2.] These are underpinned by targets for various chemical and physical attributes of the river in line with Common Standards Monitoring Guidance (CSMG). Development within the catchment has the potential to have a detrimental effect upon is qualifying features through direct damage, sedimentation, pollution, disturbance, or changes to its hydrological regime. Currently development in the River Avon SAC catchment has resulted in elevated levels of phosphorous through foul water discharges from sewage treatment works, agriculture/aquaculture (fish farms) and package treatment plants preventing the conservation objectives from being achieved and causing the river to be in unfavourable condition. Core Policy 69 states: In order to avoid and reduce potential environmental effects on the River Avon SAC, development proposals will need to

	incorporate measures during construction to avoid and prevent pollution and mitigate potential disturbance effects; appropriate measures may include consideration of suitable buffer zones along watercourses, habitat enhancements and river access management measures.
Other relevant plans or projects	None
PART B: IMPACT PREDICTION ALONE	
Impact	**Predicted Effect of Impact**
Does the development boundary impinge on the SAC boundary and cause physical damage to bank side vegetation?	The development lies more than 2,100m from the SAC boundary at its closest point. The development proposals will not impinge on the SAC boundary. No impacts predicted.
Desmoulin's whorl snail requires wetland conditions found in flood zone 3. The SAC could be affected even if the application affects wetland habitat outside the SAC boundary.	The development does not affect wetland. No impacts predicted.
Pollution of the River Avon via surface and groundwater from toxic contamination (poisonous chemicals).	The development lies more than 2,100m from the SAC boundary at its closest point. Impacts from toxic contaminated surface and ground water are not predicted.
Reduction in floodplain area could affect the river's flow regime.	There will be no reduction in the floodplain of the SAC. No impacts predicted.
Construction phase impacts e.g. surface run-off, solid debris falling into river, damage to banks, water abstraction, soil disturbance, spread of invasive non-native plants.	The development lies more than 2,100m from the SAC boundary at its closest point. The development proposals will not impinge on the SAC boundary.
PART C: IMPACT PREDICTION IN-COMBINATION	
In combination with other plans or projects? Yes without mitigation the operational phase will result in elevated phosphorus levels through increased foul water discharges which in combination with other projects or plans may prevent the conservation objectives from being achieved and causing the river to be in unfavourable condition.	
PART D: CONSEQUENCES FOR CONSERVATION OBJECTIVES	
Does the project or plan have the potential to:	

Cause delays in progress towards achieving the conservation objectives of the site?	No construction phase impacts predicted. Without mitigation the operational phase will result in elevated phosphorus levels. To mitigate the increased over night accommodation the following existing buildings within the Trenchard Lines MOD site will no longer be used for residential purposes: • Building 29 (on Site 1, contains 9 bedspaces) • Building 30 (on Site 1, contains 9 bedspaces) • Building 31 (on Site 1, contains 7 bedspaces) • Building 394 (on Site 3, contains 19 bedspaces This will result in a reduction of bed spaces/ overnight accommodation by 10 meaning an overall reduction of phosphate discharge. A legal agreement (Unilateral Undertaking) will ensure these buildings are not used for overnight accommodation in the future and adherence to water efficiency measures.
Interrupt progress towards achieving the conservation objectives of the site?	Refer to above.
Interfere with the balance, distribution and density of key species that are the indicators of favourable condition of the site?	Refer to above.
Change the dynamics of the relationships that define the structure and/or function of the site?	Refer to above.
Reduce the area of key habitats?	There will be no reduction in key habitat of the SAC.
Reduce the population of key species?	Without mitigation the operational phase will result in elevated phosphorus levels. To mitigate the increased over night accommodation the following existing buildings within the Trenchard Lines MOD site will no longer be used for residential purposes: • Building 29 (on Site 1, contains 9 bedspaces) • Building 30 (on Site 1, contains 9 bedspaces) • Building 31 (on Site 1, contains 7 bedspaces) • Building 394 (on Site 3, contains 19 bedspaces This will result in a reduction of bed spaces/ overnight accommodation by 10 meaning an overall reduction of phosphate

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Result in disturbance that could affect population size or density, or the balance between key species?	Refer to above.
PART E: MITIGATION FOR APPLICATION PL/2023/10827	
A legal agreement (Unilateral Undertaking) will ensure the vacated buildings are not used for overnight accommodation in the future. It will also ensure adherence to water efficiency measures.	
PART F: CONCLUSION	
Is the project likely to affect site integrity?	
a) Alone?	No
b) In combination with other plans or projects?	No
Recommendation:	
The proposals can go ahead with no likely significant effects on the SAC site, subject to the mitigation measures detailed above.	
Name of officer(s) making the assessment and date	Elizabeth Burrows Senior Ecologist, Landscape and Design Team, Wiltshire Council 17/07/2024
Natural England Comments	
Name of Natural England officer and date	