

Shadow Habitat Regulations Assessment

Land West of Westbury Road, New Farm, Warminster

November 2025

Ecology | Green Space | Community | GIS

Unit 1, Brassmill Lane Enterprise Centre | Bath | BA1 3JN

01225444114 | info@ethosep.co.uk

www.ethosep.co.uk



Report Produced for: BDW Trading Ltd.

Written by: Sarah Forsyth, Principal Ecologist

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Shadow Habitat Regulations Assessment (sHRA)

Assessment of Likely Significant Effects in accordance with the Conservation of Habitat Species Regulations 2017 (as amended) ("the Habitat Regulations")

Habitat Regulations Assessment (HRA) Process:

Consideration of the potential impacts of a development proposal pursuant to Regulation 63 Habitats Regulations is a mandatory stepwise process:

63 (1) A Competent Authority before deciding to undertake or give any consent, permission or other authorisation for a plan or project which –

- a) Is likely to have a significant effect on a European Site or a European offshore marine site (either alone or in combination with other plans or projects), and*
- b) is not directly connected with or necessary to the management of that site,*

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

63 (5) in the light of the conclusions of the assessment, and subject to regulation 64 (considerations of overriding public interest), the competent authority may agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site or the European off shore marine site (as the case may be).

Assessment pursuant to the Habitats Regulations therefore involves:

- 1) **Screening stage** – to check if the proposal is likely to have a significant effects (LSE) on the site's conservation objectives (which, since the People over Wind decision must exclude measures intended to avoid or reduce potential harmful effects on a European site);
- 2) **Appropriate Assessment** – to assess the LSEs in more detail and identify way to avoid or minimise any effects.
- 3) **Derogation** – to consider if proposals that would have an adverse effect on a European site (i.e. fail the integrity test) qualify for an exemption.

The Competent Authority has a duty to have regard to any potential impacts that a project may have.

Planning Application Reference:	Outline application for proposed development 'Erection of up to 205 no. dwellings, community hub, public open space, access, infrastructure and associated works, with all other matters reserved'.
Site Address:	Land West of Westbury Road, New Farm, Warminster, Wiltshire. Central Grid Reference: ST87103 46424.
Proposal:	The proposals for the site comprise a residential development with associated access and green space.

PLAN/PROJECT INFORMATION:

The site largely comprises arable cropland and modified grassland pasture. Other habitat includes a parcel of other neutral grassland, wet woodland and hedgerows.

The wider environment consists of agricultural and woodland, with the town of Warminster south of the site.



- The site is within the 6.4km recreational impact zone of the Salisbury Plain SAC SPA.
- The site is within the catchment area for the River Avon SAC, which encompasses five rivers flowing into the River Avon at Salisbury; River Nadder, River Wylfe, River Till, River Avon and River Bourne
- The site is within the 4000m consultation buffer for greater horseshoe bats, associated with Bath and Bradford on Avon Bats SAC.

Sailsbury Plain SAC

Largest known expanse of unimproved chalk downland in north-west Europe containing 41% of Britain's remaining area of this habitat. Annex I habitats include; *Juniperis communis* formations on heaths or calcareous grasslands and Semi-natural dry grasslands and scrubland facies on calcareous

substrates (*Festuco-Brometalia* (*important orchid sites). Annex II Species include Marsh Fritillary Butterfly (*Euphydryas* (*Eurodryas*, *Hypodryas*) *aurinia*).

The SPA is designated due to the presence of significant breeding populations of stone curlew (*Burhinus oediceus*), quail (*Coturnix coturnix*) and hobby (*Falco subbuteo*) as well as wintering populations of hen harrier (*Circus cyaneus*).

Conservation Objectives

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

Qualifying Features:

A082 *Circus cyaneus*; Hen harrier (Non-breeding)

A099 *Falco subbuteo*; Eurasian hobby (Breeding)

A113 *Coturnix coturnix*; Common quail (Breeding)

A133 *Burhinus oediceus*; Stone-curlew (Breeding)

River Avon SAC

The Avon and its tributaries comprise a large, lowland river system. It includes sections running through chalk, greensand and clay, with transitions between them. The river supports five aquatic species *Ranunculus* and The River Avon supports a mosaic of aquatic habitats that support a diverse fish community.

Site character:

Inland water bodies (Standing water, Running water) (95%)

Bogs, Marshes, Water fringed vegetation, Fens (2%)

Heath, Scrub, Maquis and Garrigue, *Phygrana* (2%)

Broad-leaved deciduous woodland (1%)

Annex I habitats that are a primary reason for selection of this site;

- **3260 Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitriche-Batrachion* vegetation**

The Avon in southern England is a large, lowland river system that includes sections running through chalk and clay, with transitions between the two. Five aquatic *Ranunculus* species occur in the river system, but stream water-crowfoot *Ranunculus penicillatus* ssp. *pseudofluitans* and river water-crowfoot *R. fluitans* are the main dominants. Some winterbourne reaches, where *R. peltatus* is the dominant water-crowfoot species, are included in the SAC.

Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:

- Not Applicable

Annex II species that are a primary reason for selection of this site:

- **1016 Desmoulin's whorl snail *Vertigo moulinsiana***

There is an extensive population of **Desmoulin's whorl snail** *Vertigo moulinsiana* along about 20 km of the margins and associated wetlands of the Rivers Avon, Bourne and Wylfe. This is one of two sites representing the species in the south-western part of its range, in chalk stream habitat. It occurs here in a separate catchment from the Kennet and Lambourn, within an environment more heavily dominated by arable agriculture.

- **1095 Sea lamprey** *Petromyzon marinus*

The Avon represents **sea lamprey** *Petromyzon marinus* in a high-quality river in the southern part of its range. There are excellent examples of the features that the species needs for survival, including extensive areas of sand and gravel in the middle to lower reaches of the river where sea lampreys are known to spawn.

- **1096 Brook lamprey** *Lampetra planeri*

The Avon is a high-quality river that represents the southern part of the range of **brook lamprey** *Lampetra planeri*. A healthy, stable population occurs in the main river and in a number of tributaries. The main river, and in particular its tributaries, provides clean beds of gravel for spawning and extensive areas of fine silt for juveniles to burrow into.

- **1106 Atlantic salmon** *Salmo salar*

The Avon in southern England represents a south coast chalk river supporting **Atlantic salmon** *Salmo salar*. The salmon populations here are typical of a high-quality chalk stream, unaffected by the introduction of genetic stock of non-native origin. The Avon has an excellent mosaic of aquatic habitats, which include extensive areas of gravels essential for spawning and growth of juvenile fry. There has been limited modification of the river course by comparison with many other southern lowland rivers in England.

- **1163 M** *Cottus gobio*

The Avon represents **bullhead** *Cottus gobio* in a calcareous, relatively unmodified river in the southern part of its range in England. The River Avon has a mosaic of aquatic habitats that support a diverse fish community. The bullhead is an important component of this community, particularly in the tributaries.

Annex II species present as a qualifying feature, but not a primary reason for site selection

- Not Applicable

River Avon SAC Conservation Objectives¹

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.

The key issues for achieving the Conservation Objectives and maintaining the integrity of the River Avon SAC site relate to:

- Physical modification;
- Siltation;
- Water pollution;

¹ European Site Conservation Objectives for River Avon Special Area of Conservation Site Code: UK0013016. Nov 2018 (v3)

- Water abstraction;
- Change in species distribution;
- Invasive species;
- Public access/disturbance;
- Hydrological changes;
- Inappropriate weed control;
- Change in land management; and
- Habitat fragmentation.

Bath and Bradford on Avon Bats SAC

Conservation Objectives²:

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;
- The distribution of qualifying species within the site.

Key issues currently impacting or threatening the condition of the SAC features³ - relevant issues to this application are highlighted in bold for consideration in the screening:

Qualifying features	Key Issues/Environmental Conditions
S1303 Lesser horseshoe bat, S1304 Greater horseshoe bat, S1323 Bechstein's bat	• Planning permissions • Change in land management • Direct impacts from third party • Offsite habitat availability and management • Public access/disturbance • Change to site conditions • Inappropriate designation boundary.
S1323 Bechstein's bat	• Lack of bat data and knowledge of local population activity.

Planning Permissions

There is currently difficulty in determining cumulative impacts of development across such a wide area and across local authority boundaries, including operations carried out under an European Protected Species license. This applies to both the developments themselves and the surveys which are needed to inform the planning application process. There is currently no formal way of assessing the cumulative impacts of "high disturbance" level surveys (e.g. mist netting, harp trapping, radiotracking) being carried out outside the SAC boundary which may have cumulative impacts on the features of the SAC. Similarly, there is no formal way of assessing cumulative impacts on the SAC from permissions granted by the different competent authorities.

Direct Impacts from third party

² Publication date: 27th November 2018, V3.

³ Site Improvement Plan Bath & Bradford on Avon Bats, UK0012584. Improvement Programme for England's Natura 2000 Sites (IPENS) Planning for the Future, v1.0. 01/04/2015.

One-off acts of vandalism or impacts of recreational pursuits could have a devastating effect if done in close proximity to roosting bats. There have been impacts at Brown's Folly, Box Mine and Bathampton Down Mines, specifically from third parties gaining access for inappropriate purposes.

Public access/disturbance

It is very difficult to close the sites to public access, potentially causing disturbance. This is a pressure in terms of continuous long-term disturbance by visitors, however the sites are managed in such a way that it does not present a significant pressure unless the volume and frequency of visitors were to increase. The threat to the sites come from one-off events such as: fire juggling near to the maternity colony; use of aerosol spray paints underground; use of fuel of any type underground, and bonfires at the mine entrances.

Is the application directly connected with, or necessary to the management of the SAC for Nature Conservation?

No.

Proposals that are clearly necessary for, or of value to, or inevitable as part of, management of the site for its qualifying interests can be scoped out of further assessment

Key environmental conditions to support site integrity:

Qualifying features	Key Environmental Conditions
H6210 Dry grasslands and scrublands on chalk or limestone (important orchid sites)	• Appropriate levels of grazing management for calcareous grassland (and foraging habitat for bats). • Management of scrub to avoid loss of grassland.
H9180 Mixed woodland on base-rich soils associated with rocky slopes	• Appropriate woodland management.
S1303 Lesser horseshoe bat, S1304 Greater horseshoe bat	• Undisturbed roosts. • Appropriate levels of grazing management for calcareous grassland as foraging habitat for bats – grassland and dung invertebrates. • Woodland management. • Maintenance and connectivity of habitats used as flight lines.

Is the application directly connected with, or necessary to the management of the SAC for Nature Conservation?

No.

Proposals that are clearly necessary for, or of value to, or inevitable as part of, management of the site for its qualifying interests can be scoped out of further assessment.

1. SCREENING

Is the project likely to have a significant effect either 'alone' OR 'in-combination'?

Salisbury Plain SPA

The site is screened out of a likely significant effect 'alone' on the Salisbury Plain SPA from this sHRA, as planned projections for housing delivery has been reviewed and reassessed in 2024 by Wiltshire

Council⁴ with the conclusion of no likely significant effects on the Salisbury Plain SPA through increasing recreational pressure, provided the Mitigation Strategy for Stone Curlew is continued to be implemented.

Where new development is proposed within the visitor catchment which is within overall housing figures set out in the WCS, WHSAP, ABP masterplan and emerging Local Plan, the Council may continue to rely upon the conclusions of this strategic level HRA, without the need to carry out individual project level HRAs of individual planning applications (subject to the advice of NE in relation to specific projects).

Wiltshire Council and the MOD have a detailed monitoring and management strategy in place, which has been going since 2012 and data collated from monitoring is fed into adaptive land management around the SPA.

River Avon SAC SPA

Without mitigation, the proposed development, 'alone', may have a likely significant effect on the ecology and biodiversity of the River Avon SAC from changes in surface water runoff /pollution risk, causing elevated levels of Total Phosphorous. This could occur through surface water and foul water discharge pathways. These pathways could lead to increased pollution risk and elevated concentrations of total phosphorus within the River Avon catchment.

Given the sensitivity of the qualifying species supported by the River Avon SAC to nutrient enrichment and water quality deterioration, effects relating to **total phosphorus loading** and **changes in surface water run-off/pollution** cannot be ruled out at the screening stage.

Potential likely significant effects on SPA overwintering birds is screened out due to distance of the site from functional land.

River Avon SAC

Phosphorus Neutrality Report (Marian Cameron Consultants, 2025) provides an assessment of the effects of the proposed development on water quality. This technical report provides detailed information to assess and demonstrate:

- i. Demonstrate that the impact source does not exist (i.e. demonstrate Total Phosphorus neutrality); and
- ii. Demonstrate that there is no functional pathway for Total Phosphorus transfer between the development site's surface and foul water discharge and the River Avon SAC; and
- iii. Demonstrate that the qualifying features of the designated sites will not be adversely affected by any additional Total Phosphorus reaching the River Avon SAC.

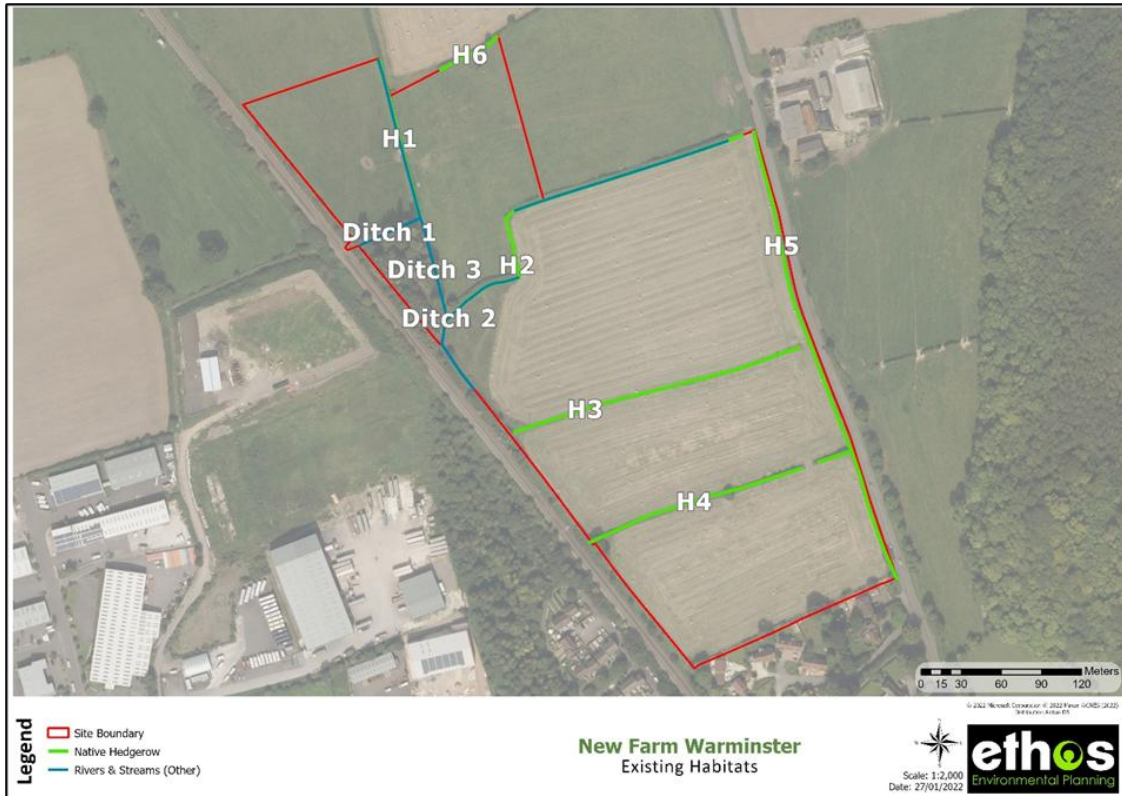
The Bath and Bradford on Avon Bats SAC

Species Surveys: (refer to *Ecological Impact Assessment Land of Westbury Road, New Farm, Warminster, 2022* and *Ecological Addendum Land West of Westbury Road, Warminster 2025*)
Summary of bat activity results:

⁴ HRA and Mitigation Strategy for Salisbury Plain SPA, reviewed in June 2024. Wiltshire Council.

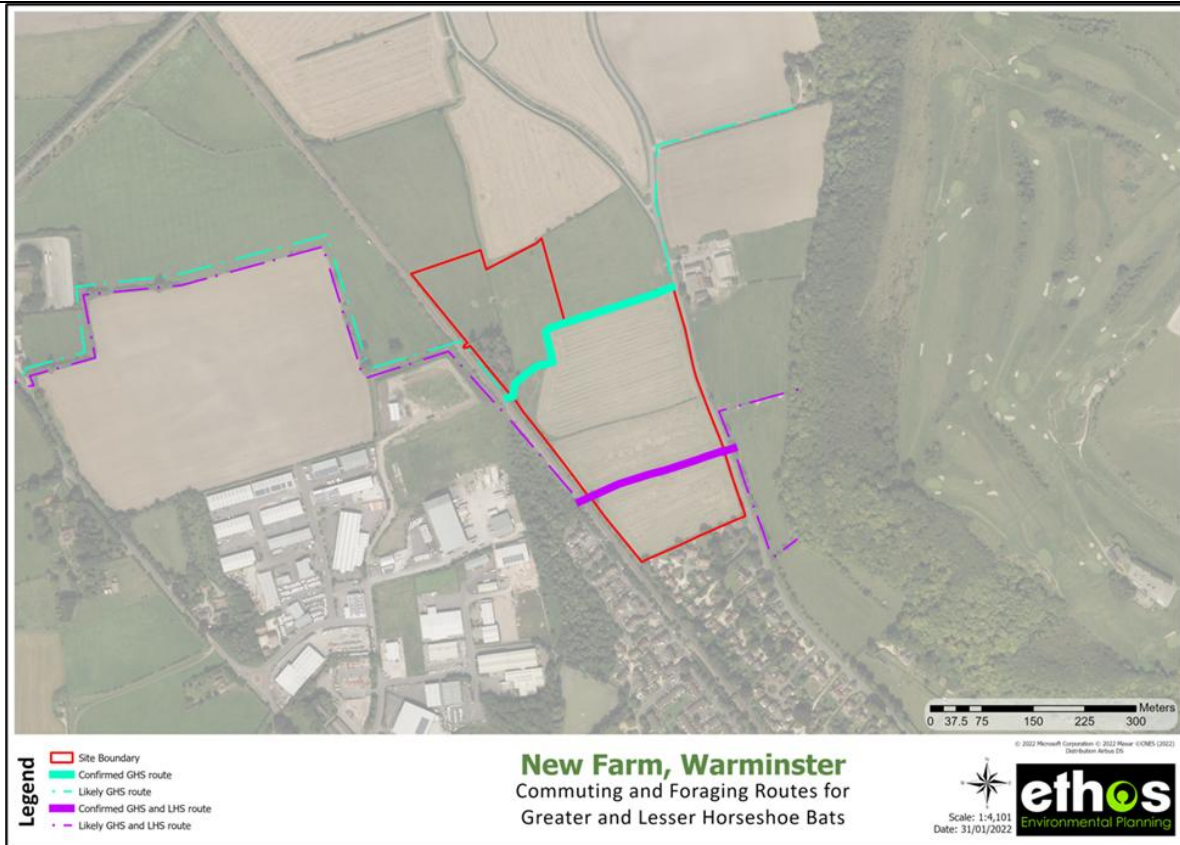
2024 bat survey data

There were low levels of greater horseshoe and lesser horseshoe bat activity across the site. There were relatively higher levels, and throughout the season, of lesser horseshoe bats recorded along the southern hedgerow (location 3). For greater horseshoe bats, low but regular activity through the season was noted on the northern boundary (location 1) and southern hedgerow (location 3). The corresponding hedgerow references are H2 (north boundary) and H4 (southern hedgerow) as shown in Figure 5.



From comparison with data at other static locations, and review of the habitats in the wider landscape, it is assessed that the southern hedgerow is the key commuting (east-west) and foraging feature for both lesser and greater horseshoe bats. This less frequently managed hedgerow provides a strong linear connection between Arns Hill woodland to the east and the railway corridor to the west. The results and assessment are shown in Figure 6.

The northern boundary hedgerow is also assessed to be key commuting and foraging feature for greater horseshoe bats. Activity was recorded regularly through the season. This hedgerow bounds the field that was cattle-grazed, and links to the wet woodland to the west, as shown in Figure 6.



2025 Bat survey data

A bat static detector survey was undertaken for a period of 8 consecutive nights, 27th August to 4th September. By collating late summer early autumn bat data, provided the levels of bat activity were similar as previously recorded across the site; together with no significant changes in habitat or land usage, it could be reasonably extrapolated that there has been no change in assemblage use of commuting features.

Detectors were deployed in the same locations as the previous survey to ensure consistency and comparability of results. This repeat survey allows direct assessment of any changes in species presence, activity patterns, or foraging behaviour.

The data largely concurs with the previous evaluation of the site's importance for bats and therefore the assessment and mitigation measures for horseshoe bats remains as assessed. In general, the results indicate that bats are utilising the site for commuting between the woodland to the east and the key commuting railway corridor to the west. There appears to be an increase of activity in September, likely attributed to bats transitioning summer roost site, swarming sites and their hibernation roosts.

Assessment of effects – Bath and Bradford on Avon Bats SAC

Feature	Relevant Pressure/ Threat	Sensitivity / impact pathway	Risk to Conservation objectives	LSE – A	LSE – IC
S1303 Lesser horseshoe bat, S1304 Greater horseshoe bat, S1323 Bechstein's bat	Fragmentation of commuting routes (lighting)	Functional bat habitat that qualifying species rely on.	SAC Habitats and associated functional SAC habitats SAC Habitats and associated functional SAC habitats Maternity and hibernation colonies of horseshoe bats are located within the SAC habitats, including use of buildings, mines and caves; which are used year after year and the SAC as a whole supports 3% of the UK population of greater horseshoe bats and internationally significant populations of lesser horseshoe bats. Females disperse from the maternity roost to feed along established flyways to core sustenance zone to other feeding sites in the wider landscape. Flyways consist of tracks and paths through woodland, overgrown hedgerows, and paths with hedgerows on both sides. In open country flyways follow watercourses lined with vegetation. To some extent the ability of the female to feed herself and dependent young depends on the condition of these flyways. Horseshoe bats also rely on feeding perches and night roosts. Introduction of lighting can cause fragmentation of flyways as horseshoe bats are highly sensitive to light and will actively avoid lit areas and may abandon commuting routes if they are illuminated. This can then impact accessibility to foraging grounds, night roosts and ultimately impact populations due reduced breeding success. Protection and enhancement of preferred foraging habitats and linear landscape features (tree lines and hedgerows) connecting suitable foraging habitat. Site The north and south hedgerows on site are used by commuting horseshoe bats.	Yes	/
S1303 Lesser horseshoe bat, S1304 Greater horseshoe bat.	Disturbance /loss of foraging habitat	Woodland parcels and woodland strip.	No loss of important SAC bats foraging habitat. Site is largely arable. Wet woodland being retained.	No	No

S1303 Lesser horseshoe bat, S1304 Greater horseshoe bat,	Planning permissions	Cumulative impacts across large area and across local authority boundaries.	Without a strategic approach and without appropriate level of surveys, potential impacts may not be fully considered.	No	No
S1303 Lesser horseshoe bat, S1304 Greater horseshoe bat	Direct impact from third party	Disturbance of roosts.	No loss of habitat/structures supporting roosts. Site is some distanced from key hibernation sites (mines/caves), increase in resident at this site, not considered to significantly increase risk of disturbance from third parties/public access.	No	No
S1303 Lesser horseshoe bat, S1304 Greater horseshoe bat	Public access / disturbance			No	No
A- Alone IC – in-combination					
2. APPROPRIATE ASSESSMENT – PART 1, REASONED APPRAISAL OF LIKELY SIGNIFICANT EFFECTS An assessment of the implications for the SAC/Favourable Conservation Status of Qualifying Species, in view of its Conservation Objectives					
Scope of Appropriate Assessment					
River Avon The Sites and Qualifying Features for which significant effects (whether ‘alone’ or ‘in combination’) are likely and cannot be ruled out and are relevant to this appropriate assessment are: • Total Phosphorous via waste water • Changes in surface water runoff (construction and operation) • Qualifying aquatic species.					
Bath and Bradford on Avon SAC The Sites and Qualifying Features for which significant effects (whether ‘alone’ or ‘in combination’) are likely and cannot be ruled out and are relevant to this appropriate assessment are: • S1303 Lesser horseshoe bat • S1304 Greater horseshoe					
Environmental Pressure	Risk to Conservation Objectives and Relevant Design Features and Mitigation Measures				
BATH AND BRADFORD ON AVON SAC					
Disturbance/Fragmentation of commuting routes (lighting)	Without mitigation the introduced lighting associated with the proposals (external and internal light source) could affect the function of hedgerow habitat by increasing illumination above levels likely to cause adverse disturbance to commuting horseshoe bats and their prey, as well as connectivity between roost sites.				
S1303 Lesser horseshoe bat,	Displacement could affect the fitness of greater and lesser horseshoe maternity roosts, and such effects could be considered significant on their favourable conservation status.				

S1304 Greater
horseshoe
bat,

Conservation Objectives:

The structure and function (including typical species) of qualifying natural habitats.

The key mitigation for LSEs relating to indirect impacts of introduced lighting are:

- Dark corridors - below 0.5 lux along the northern and southern hedgerows (and central hedgerow linking to attenuation basin)
- Canopy hop-overs at road sections in the southern hedgerow and the central hedgerow (linking to attenuation basin).

At the reserved matters application, a detailed lighting assessment and plan will be undertaken to demonstrate delivery of the dark corridor, showing lux contours.

The dark corridor parameters plan with canopy hop overs is shown below:



(NB -old layout, but dark corridors (blue) and canopy hopovers (purple) as marked on hedgerows retained and buffered).

Development proposals will be designed with a suite of lighting mitigation, as well as careful placement to retain dark corridors, measures will likely include:

- restriction on luminaire tilt;
- installation of back light shielding;
- lowest possible correlated colour temperature – standard 2700K, down to 1750K in ecologically sensitive areas;
- lowest applicable safe lighting standards;
- minimal height for mounting luminaires;
- use of appropriate optics specific to area being lit;
- use of luminaires with integral LEDs and only where luminaire photometry is available from the manufacturer.

The retained dark corridors on northern, lower central and southern hedgerows, with canopy hop overs at road intersections; together with sensitive lighting

	strategy will, is considered to provide sufficient mitigation to retain the functionality of the hedgerows for commuting greater and lesser horseshoe bats. With modelling to show that predicted light spill from street luminaires, outside lights and internal light sources, do not exceed lux levels of above 0.5 lux, this meets the equivalent of zone B (<0.5 lux) as set out in BANES' bat habitat zoning for river corridors⁵ <i>Protecting bats in waterside development</i>. The lighting guidance (ILP GN08:2023) highlights the importance of minimising artificial light close to vegetation and to increase dense vegetation in the urban landscape. Research into bat commuting through the landscape has shown the effects of artificial lighting to be particularly harmful along river corridors, woodland edge habitat and hedgerows. GN08 notes that for vertical calculation planes, very low levels of light (<0.5 lux) are very difficult to demonstrate. Where 'darkness' is sought on ecological receptors, a threshold of 0.4 lux of the vertical plane and 0.2 lux on the horizontal plane should be the aim, particularly when mitigation is for Annex II light sensitive bats. Pre app consultations set out these target thresholds in line with best practice guidance. Summary There is no loss of suitable bat habitat on site. The Landscape Strategy includes significant areas of new bat habitat –species rich grassland, woodland belt, traditional orchard and Sustainable Drainage Areas (SuDs) with attenuation basin, swales and rain gardens. These habitats will provide enhanced foraging habitat for bats, as they are suitable for supporting support prey species for bats. By mitigating impacts of introduced lighting, retaining dark corridors along the linear features on site (linking offsite bat habitat – railway corridor to west and woodland to east) and creating woodland buffer strip along the west boundary along the offsite key foraging and commuting corridor (railway); it is considered that this will maintain the functionality of habitat used by greater and lesser horseshoes, and therefore the breeding success (favourable conservation status) for these two qualifying species.
3. CONCLUSIONS ON SITE INTEGRITY Is the proposal likely to have a significant effect 'alone' or 'in combination' on a European Site?	
In the absence of mitigation, the development has the potential to impact the integrity of the SAC (habitat and qualifying species) through the following LSEs: • Loss and fragmentation of flyways (development and lighting) The outline design includes buffers and dark corridors (<0.5 lux) retained along the north, lower centra and southern hedgerows; with creation and enhancement of bat habitats (woodland, orchard, species rich grassland). The mitigation measures provided within the scheme comprising: • the retention and buffering of the key offsite commuting and foraging bat corridor;	

⁵ WaterSpace Design Guidance, Protecting Bats in Waterside Development, BANES Planning Department Environment and Design Team and other consultants and Natural England. 2018.

- the retention and buffering of onsite commuting features;
- provision enhanced foraging habitat for bats;

is assessed that the favourable conservation status of the qualifying species of the SAC, greater and lesser horseshoe bats, will be appropriately mitigated.

Therefore, it can be concluded, in view of the site conservation objectives, any likely significant effects arising from the development proposals, with mitigation measures including a dark corridor on functional habitat, provision of bat habitat on site; will not have an adverse effect on the integrity of the Bath and Bradford on Avon Bats SAC, either alone or in combination with other plans and projects. This is provided that the mitigation is secured and delivered through planning obligations.

RIVER AVON SAC – Read in conjunction with ‘Land West of Westbury Road, Warminster Phosphorous Neutrality Report (Marian Cameron Consultants, 2025) and the ‘Nutrient Calculator River Avon SAC spreadsheet’ (Marian Cameron Consultants, 2025).

LSE’s:
deteriorating
water quality
affecting
favourable
conservation
status of
qualifying
species.

To meet the conservation objectives of the River Avon SAC, to ensure that the integrity of the site is maintained, mitigation measures need to ensure that the natural water quality, hydrological processes and ecological conditions that support the designated habitats and species are not significantly degraded.

Elevated concentrations of Total Phosphorus have been identified as a key pressure on the River Avon system, contributing to eutrophication and adversely affecting the ecological functioning and biodiversity of the designated site. Increased phosphorus loading can alter aquatic plant communities, reduce dissolved oxygen, and consequently impact qualifying species such as watercourses supporting *Ranunculon fluitantis* and *Callitricho-Batrachion* vegetation, as well as associated fauna.

A series of embedded and additional mitigation measures are proposed to ensure no adverse effect on the integrity of the River Avon SAC – during construction and operation (refer to Nutrient Neutrality Report for details).

In addition, the scheme will deliver nutrient neutrality (refer to Nutrient Neutrality Report and total phosphorus budget calculator).

Taking account of the design safeguards, proposed water quality controls, and secured mitigation measures, it is concluded that the proposed development will not increase Total Phosphorus loading to the River Avon SAC, nor will it adversely affect hydrological processes or water quality conditions essential for supporting its qualifying habitats and species.

The mitigation measures ensure that treated surface water and foul water discharges will not contribute to eutrophication effects currently impacting the SAC, and the calculations provide evidence that the development will be phosphorus-neutral.

Natural England’s conservation objectives for the River Avon SAC, to maintain or restore water quality and ecological conditions necessary to achieve favourable conservation status, will therefore not be undermined.

4. CONCLUSIONS ON SITE INTEGRITY

Is the proposal likely to have a significant effect 'alone' or 'in combination' on a European Site?

To enable the Proposed Development to achieve Phosphorus Neutrality 17.85 kg TP/yr credits to off-set nutrients pre-2030 will be purchased from within the River Avon SAC catchment upstream of Warminster Water Treatment Works (WWTW) and the Site to offset the Total Phosphorus produced by the Proposed Development to facilitate commencement of occupation pre-2030. If occupation of the Proposed Development occurs post-2030 then 12.03 kg TP/yr credits would be purchased instead. The credits would be secured through the Section 106 agreement.

Overall, it is concluded, in view of the site conservation objectives, any Likely Significant Effects arising from the proposals, in either scenario, will be Total Phosphorus neutral and will not adversely affect the site integrity of River Avon Special Conservation Area (SAC), either 'alone' or 'in-combination' with other plans and projects.