



Defence Infrastructure Organisation

Service Families Accommodation Model Homes Development Sling Road, Bulford

Report to inform Habitats Regulations
Assessment Stage 1





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Bulford Service Families Accommodation Site – Bulford Camp, Sling Road

Report to inform Habitats Regulations Assessment Stage 1

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EXECUTIVE SUMMARY

Jones Lang LaSalle (JLL) on behalf of the Defence Infrastructure Organisation (DIO) commissioned WSP to complete a report to inform a Habitat Regulations Assessment (HRA) for land at Sling Road, Bulford in Wiltshire (hereafter referred to as the 'Site'). Eight houses are proposed for construction as part of the Service Families Accommodation; hereafter referred to as the 'Proposed Development'. The Site covers approximately 1.13 ha and is centred on grid reference SU 18864 44408.

Under the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended)¹ ('The Habitats Regulations') it is necessary to consider whether the Proposed Development may have significant effects upon areas of nature conservation importance (Habitats Sites).

A desk-based assessment identified the potential for adverse effects of the Proposed Development upon Habitats Sites. The following sites were identified within a 10km (kilometre) Zone of Influence (Zoi) of the Site:

- Salisbury Plain Special Area of Conservation (SAC)
- Salisbury Plain Special Protection Area (SPA)
- River Avon SAC
- Porton Down (SPA)

No additional Habitats Sites supporting bird qualifying features are present within 20km of the Site.

Stage 1 – Screening for the HRA identified the potential for likely significant effects (LSE), following the precautionary principle, on Habitats Sites for six potential impact pathways:

- LSE due to land take (functionally linked land) from the Salisbury Plain SAC and SPA;
- LSE from air quality due to an increase in dust for River Avon SAC and Salisbury Plain SAC and SPA;
- LSE due to accidental pollution events (run-off) for the River Avon SAC and Salisbury Plain SAC and SPA;
- LSE from construction derived disturbance to River Avon SAC and Salisbury Plain SAC and SPA ;
- LSE due to increased recreational disturbance at the Salisbury Plain SAC and SPA; and
- LSE on water quality (nutrient neutrality) of the River Avon SAC.

As such, a Stage 2 – Appropriate Assessment is required to assess the likely significant effects of the Proposed Development, both alone and in-combination, on the integrity of the Habitats Sites listed above for those impact pathways where LSE at screening could not be ruled out. This assessment will also consider and recommend appropriate mitigation measures. Furthermore, to inform this assessment, the results of the further survey for stone curlew and of the grassland on site, recommended within the Preliminary Ecological Appraisal (PEA) undertaken for the Proposed Development, are required to address whether the Site acts as functionally linked land for the Salisbury Plain SAC and SPA.

¹ Her Majesty's Stationary Office (2017). The Conservation of Habitats and Species Regulations 2017/490.

1 INTRODUCTION

1.1 PROJECT BACKGROUND

- 1.1.1. The Defence Infrastructure Organisation (DIO) (hereafter referred to as “the Client”) is seeking to develop land at Bulford for new services families accommodation (the “Proposed Development”).
- 1.1.2. The planning application boundary is shown on **Figure 1**. The land is currently 1.13 ha of mostly modified grassland and other developed land (roads and pavement) with some scrub and individual trees near Bulford Camp (central grid reference SU 18864 44408), hereafter referred to as the “Site”.
- 1.1.3. The works for the Proposed Development will be conducted within the Site, and it is currently assumed that all welfare facilities, plant storage and material storage will be stored within the Site or on nearby hardstanding (hereafter referred to as the “Compound”) and therefore will not be assessed separately. If the Compound is situated anywhere other than within the Site or on nearby hardstanding (as demonstrated to WSP) then this location will need to be reviewed for potential impacts and this assessment updated as required.
- 1.1.4. Under the current design, the Proposed Development comprises proposals for additional housing (eight dwellings) and associated infrastructure to be built to the north of the existing Bulford Camp. Full planning permission will be sought for the Proposed Development from Wiltshire Council.
- 1.1.5. The ecological baseline for the Proposed Development has been determined through completion of a Preliminary Ecological Appraisal (PEA)² comprising a UK Habitat Classification (UKHab) survey, desk study and protected and notable species assessment, a preliminary Biodiversity Net-Gain (BNG) Assessment³ and a Tree Survey⁴ and Constraints Report plus follow up Arboricultural Impact Assessment (AIA)⁵.
- 1.1.6. A Nutrient Neutrality Technical Note⁶ has also been created in support of this document.

² WSP (2026) – Bulford: Preliminary Ecological Appraisal. Report Reference: 70110456-001

³ WSP (2026) – Bulford: Biodiversity Net Gain Report

⁴ Amenity Tree Environmental Planning Consultants (2025) Tree Survey and Constraints Report - Bulford Demo Site

⁵ Amenity Tree Environmental Planning Consultants (2026) Arboricultural Impact Assessment (AIA) Bulford, Sling Rd

⁶ WSP (2026) Nutrient Neutrality Technical Note Bulford

2 HABITATS REGULATIONS ASSESSMENT PROCESS

2.1 LEGISLATIVE CONTEXT

Habitats Regulations Assessment

- 2.1.1. Under the requirements of UK law through the Conservation of Habitats and Species Regulations 2017 ('The Habitats Regulations') (as transposed from the European Council Directive 92/43/EEC 'The Habitats Directive' and the Council Directive 79/409/EEC 'The Wild Birds Directive') it is necessary to consider whether the Proposed Development is likely to have significant effects upon areas of nature conservation importance designated/classified under the Directives. The Habitats Regulations place a duty upon 'Competent Authorities' (in this case Wiltshire Council) to consider the potential for effects upon Habitats Sites⁷ (Special Areas of Conservation (SAC) Special Protection Areas (SPA), candidate SACs, Sites of Community Importance and any relevant Marine Sites) prior to granting consent for projects or plans. Should likely significant effects be identified by the initial screening process, it is necessary to further consider the effects by way of an 'Appropriate Assessment'. Overall, this process of assessment is known as Habitats Regulations Assessment (HRA).
- 2.1.2. Under updates to the Habitats Regulations in 2019, SPAs and SACs are considered to collectively form a National Site Network i.e. a coherent network of protected sites with overarching conservation objectives. It is a matter of Government policy (NPPF paragraph 194)⁸ that sites designated under the 1971 Ramsar Convention for their internationally important wetlands (commonly known as Ramsar sites), potential SACs (pSACs) and potential SPAs (pSPA) (where consultation has been initiated) are also protected in the same way as SACs and SPAs. Ramsar sites however do not form part of the National Site Network under the Habitats Regulations.
- 2.1.3. For the purposes of this report, and in line with NPPF terminology, all relevant sites as described above are collectively termed 'Habitats Sites'.
- 2.1.4. Following the UK's exit from the EU, The Conservation of Habitats and Species Regulations 2017 were amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. As advised by national governments in the UK, the Habitats Regulations remain in force, including the general provisions for the protection of Habitats Sites and the procedural requirements to undertake HRA to assess the implications of plans or projects for European sites. The changes made were only those necessary to ensure that they remain operable now that the UK has left the EU.
- 2.1.5. Regulation 63 (1) of the Habitats Regulations⁹ states that:

⁷ Termed European sites within The Habitats Regulations, following the UK's departure from the European Union, the National Planning Policy Framework (NPPF) (Ministry of Housing, Communities and Local Government, 2024) defines Habitats sites as 'Any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations.'

⁸ National Planning Policy Framework (Paragraph 194) - (Amended 07.02.2025) Found at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> (accessed 02.02.2026)

⁹ Regulation 63 of the Habitats Regulations. Available at: <https://www.legislation.gov.uk/ukSI/2017/1012/regulation/63/made>

‘...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.’

- 2.1.6. Where effects on a Habitats Site are likely to be significant, they must be subject to the second stage of the HRA process, Appropriate Assessment. The Habitats Regulations also make allowance for projects or plans to be completed if they satisfy ‘imperative reasons of overriding public interest’ (IROPI) where Stage 2 has concluded that an adverse effect on the integrity of one or more Habitats Sites cannot be ruled out. Regulations 64¹⁰ and 68¹¹ relate to such situations.
- 2.1.7. There are a number of Court of Justice of the European Union (CJEU) rulings which are relevant to this assessment, and these are summarised below for information. Further information is provided within **Appendix A**. As the general provisions for the protection of Habitats Sites and the procedural requirements to undertake HRA to assess the implications of plans or projects for Habitats Sites remain, this previous case law established prior to the UK's exit from the EU is considered to apply unless superseded by the judgement of an appropriate UK court.

2.2 STAGES OF HABITATS REGULATIONS ASSESSMENT

- 2.2.1. The UK government has set out the step wise approach which should be followed to enable Competent Authorities to discharge their duties under The Habitats Regulations¹² and provides further clarity on the interpretation of Articles 6 (3) and 6 (4), and the actions required under Regulation 63⁹ (1) of The Habitats Regulations. The process used is usually summarised in three distinct stages of assessment.
- **Stage 1: Screening:** the process which identifies whether effects upon the Habitats Sites by a plan or project are possible, either alone or in combination with other plans or projects. The screening assessment then considers whether these effects are likely to be significant.
 - **Stage 2: Appropriate Assessment:** the detailed consideration of the effect on the integrity of the Habitats Sites by the plan or project, either alone or in combination with other plans or projects, with respect to the Habitats Site's conservation objectives and its structure and function.
 - **Stage 3: Derogations:** the process under which a plan or project may still go ahead if it fails the integrity test at Stage 2. To qualify for a derogation, the plan or project must pass three legal tests:

¹⁰ Regulation 64 of the Habitats Regulations. Available at: <https://www.legislation.gov.uk/ukSI/2017/1012/regulation/64/made>.

¹¹ Regulation 64 of the Habitats Regulations. Available at: <https://www.legislation.gov.uk/ukSI/2017/1012/regulation/68/made>

¹² UK Gov. 2023. Guidance ‘Habitats regulations assessments: protecting a European site’. Available at: <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>.

- There are no feasible alternative solutions that would be less damaging or avoid damage to the site;
- The plan or project needs to be carried out for imperative reasons of overriding public interest (IROPI); and
- Necessary compensatory measures to maintain the overall coherence of the National Site Network can be secured.

2.2.2. In accordance with the People over Wind Judgment (People over Wind and Peter Sweetman v Coillte, 2018) (Case 323/17) targeted measures to mitigate effects on the Habitats Sites will not be considered at the HRA screening stage. The People Over Wind ruling states that:

“...in order to determine whether it is necessary to carry out, subsequently, an appropriate assessment of the implications, for a site concerned, of a plan or project, it is not appropriate, at the screening stage, to take account of the measures intended to avoid or reduce the harmful effects of the plan or project on that site.”

2.2.3. UK government guidance to Competent Authorities carrying out HRA (Defra, Natural England (NE), Welsh Government, and Natural Resources Wales (NRW), 2021) further confirms this requirement. In relation to HRA screening, this guidance states that:

“At this stage, you should not consider any mitigation measures included by the proposer for the purpose of avoiding or minimising risk to a European site. These mitigation measures need to be considered at the appropriate assessment stage.”

2.3 SCREENING (STAGE 1)

2.3.1. An initial broad screening of Habitats Sites to investigate the potential for effects pathways linking them to the Proposed Development has been undertaken and is referred to as ‘screening’. The screening process was wide-ranging and took into consideration the sensitivity and mobility of Habitats Site’s qualifying features, e.g. breeding birds, as well as the nature of the Proposed Works and working methods.

2.3.2. Its purpose was to identify the likely impacts upon Habitats Sites from the Proposed Development within a broad zone of influence, either alone or in combination with other plans or projects and considers whether these impacts are likely to be significant. It included:

- determining whether the Proposed Development is directly connected with, or necessary for, the management of applicable Habitats Sites;
- describing the elements of the Proposed Development that may have the potential for significant effects upon applicable Habitats Sites;
- undertaking an initial scoping for potential direct and indirect impacts upon applicable Habitats Sites;
- assessing the likely significance of any potential effects identified as resulting from these impacts, both alone and in-combination with other plans and projects; and
- excluding Habitats Sites where it can be objectively concluded that there will be no likely significant effects.

2.3.3. Results of the screening assessment are set out in **Section 3** to **Section 4**.

2.4 IN-COMBINATION ASSESSMENT

- 2.4.1. It is a requirement of the Habitats Regulations to consider the effects of projects or plans “in combination” at the screening stage. Regulation 24, 63 and 105 of the Habitats Regulations require Natural England and other competent authorities to consider the effects of plans or projects alone and in combination with other plans or projects. The ‘in-combination’ requirement is undertaken in order to make sure that, prior to their authorisation, the effects of numerous proposals, which alone would not result in a significant effect, are further assessed to determine whether their combined effect would be significant enough to require more detailed assessment.
- 2.4.2. The landmark Waddenzee judgment provides a clear interpretation of the legislation. Paragraphs 53 and 54 of the Judgment state:
- “according to the wording of that provision [Article 6(3) of the Habitats Directive] an appropriate assessment of the implications for the site concerned of the plan or project must precede its approval and take into account the cumulative effects which result from the combination of the plan or project with other plans or projects in view of the sites conservation objectives. Such an assessment therefore implies that all the aspects of the plan or project which can, individually or in combination with other plans or projects, affect those objectives must be identified in the light of the best scientific knowledge in the field.”*
- 2.4.3. The types of plans and projects that should be considered in an in-combination assessment include the following:
- The incomplete or non-implemented parts of plans or projects that have already commenced.
 - Plans or projects given consent or given effect but not yet started.
 - Plans or projects currently subject to an application for consent or proposed to be given effect.
 - Projects that are the subject of an outstanding appeal.
 - Ongoing plans or projects that are the subject of regular review.
 - Any draft plans being prepared by any public body.
 - Any proposed plans or projects published for consultation prior to application.
 - Projects being proposed or being undertaken by a competent authority itself which require no external authorisation.
- 2.4.4. Based on this complexity and need for consistency in the assumptions relating to mitigation, a precautionary approach should be adopted when considering the HRA conclusions of overlapping plans and projects in-combination.

3 IDENTIFICATION OF HABITATS SITES

3.1 OVERVIEW

3.1.1. This section of the report confirms those Habitats Sites that are relevant to the assessment, i.e. those where the Proposed Development could lead to a conceivable risk of harm to the Habitats Sites. Habitats Sites at a conceivable risk of harm are identified by determining:

- the impact pathways generated by the Proposed Development that could potentially lead to harm to Habitats Sites; and
- the spatial extent around the Proposed Development over which those impact pathways could conceivably have a material effect on the qualifying interests (reasons for designation) of the Habitats Sites.

3.1.2. Further information on potential impact pathways is presented in **Section 4**

3.2 STUDY AREA

3.2.1. This defines the geographic limits from the Proposed Development initially used to identify Habitats Sites to be considered within the HRA process and be screened for LSEs. The Study Area reflects the high sensitivity of qualifying interests of Habitats Sites and the fact they often support species that are mobile and wide ranging, such as birds.

3.2.2. The principal criterion defining the Study Area is a zone of 10 km surrounding the location of the Proposed Development, a distance appropriate to encompass possible impact pathways from the Proposed Development to Habitats Sites. It also factors in relevant Impact Risk Zones (IRZ) used to assess planning applications for likely impacts on Habitat Sites.

3.2.3. Additionally, any Habitats Sites featuring qualifying ornithological interests within 20km of the Proposed Works were identified, and the Conservation Objectives for SPAs and Information Sheets for Ramsar sites were checked to identify terrestrial bird features. The 20km search distance is generally considered the maximum distance, beyond which, most non-marine bird species would not travel on a regular basis between foraging and roost sites (NatureScot, 2016)¹³.

3.2.4. All Habitats Sites within the above described zones of influence have been included in this stage of the HRA process and are subject to screening for LSEs.

3.3 RELEVANT HABITATS SITES

3.3.1. As shown in Figure 2, four Habitats Sites lie within the Study Area:

- Salisbury Plain SAC (0.13km east);
- Salisbury Plain SPA (0.13km east);
- River Avon SAC (2.24km west); and
- Porton Downs SPA (6.70 km southeast)

¹³ NatureScot (2016). Habitats Regulations Appraisal (HRA) on the Firth of Forth - A Guide for developers and regulators. Available at: <https://www.nature.scot/doc/habitats-regulations-appraisal-hra-firth-forth-guide-developers-and-regulators>

- 3.3.2. The reasons for designation of these sites, as well as the conservation objectives, are summarised in Table 3-1 below. Table 3-1 also summarises known vulnerabilities of these sites, collated from the Natura 2000 Standard Data Forms (SDF)¹⁴, Natural England Citations, Conservation Objectives and Site Improvement Plans (SIP)¹⁵.

¹⁴ Joint Nature Conservation Committee (JNCC) (2016). SAC and SPA Standard Data Forms and Ramsar Information Sheets. Available online: <http://www.jncc.gov.uk/>.

¹⁵ Search for designated site details - <https://designatedsites.naturalengland.org.uk/> (accessed 02.02.2026)

Table 3-1 - Relevant Habitats Sites and known threats and pressures on these sites

Site Name	Site Size (ha)	Approx. Distance/ orientation from Site	Summary of reasons for designation summarised on Natura 2000 Standard Data Form or Ramsar Information Sheet ¹⁶¹⁷¹⁸¹⁹	Activities with greatest effect upon the site, as listed on Natura 2000 Standard Data Form or Ramsar Information Sheet	Pressures and threats listed within the Site Improvement Plan (NE, undated) (T=Threat, P=Pressure) ²⁰²¹	Conservation Objectives
Salisbury Plain SAC	21,460	0.13 km E	- Annex I habitats which are a primary reason for selection of this site: - H5130 <i>Juniperus communis</i> formations on heaths or calcareous grasslands - H6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates	Negative impacts (Threats and pressures: - M02 Changes in biotic conditions. - A04 Grazing - K04 Interspecific floral relations Positive Impacts Activities, management: - A02 Modification of cultivation practices - A04 Grazing - A06 Annual and perennial non-timber crops	- Changes in species distributions (P) - Air Pollution: risk of atmospheric nitrogen deposition (P)	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 the qualifying species

¹⁶ [Salisbury Plain SAC \(Natura 2000 Standard Data Form\)](#) (accessed 23.01.2025)

¹⁷ [Salisbury Plain SPA \(Natura 2000 Standard Data Form\)](#) (accessed 23.01.2025)

¹⁸ [River Avon SAC \(Natura 2000 Standard Data Form\)](#) (accessed 23.01.2025)

¹⁹ [Porton Down SPA \(Natura 2000 Standard Data Form\)](#) (accessed 23.01.2025)

²⁰ [Site Improvement Plan: Salisbury Plain \(SIP209\)](#) (accessed 23.01.2025)

²¹ [Site Improvement Plan: Avon River and Valley \(SIP185\)](#) (accessed 23.01.2025)

Site Name	Site Size (ha)	Approx. Distance/ orientation from Site	Summary of reasons for designation summarised on Natura 2000 Standard Data Form or Ramsar Information Sheet ¹⁶¹⁷¹⁸¹⁹	Activities with greatest effect upon the site, as listed on Natura 2000 Standard Data Form or Ramsar Information Sheet	Pressures and threats listed within the Site Improvement Plan (NE, undated) (T=Threat, P=Pressure) ²⁰²¹	Conservation Objectives
			(<i>Festuco-Brometalia</i>). Important Orchid sites). - Annex II species that are a primary reason for selection of this site: - I1065 Marsh fritillary butterfly, <i>Eurodryas Aurinia</i>.	D05 Improved access to site		- 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
Salisbury Plain SPA	19,714	0.13 km E	- Species for which the designation has been implemented: - Quail <i>Coturnix coturnix</i> (breeding site) - Hobby <i>Falco subbuteo</i> (breeding site) - Stone curlew <i>Burhinus oedicnemus</i> (breeding site) - Hen harrier <i>Circus cyaneus</i> (over-wintering)	Negative impacts (Threats and pressures: - H02 Pollution to groundwater (point sources and diffuse sources) - M02 Changes in biotic conditions. Positive Impacts Activities, management: - A02 Modification of cultivation practices - A04 Grazing - A06 Annual and perennial non-timber crops	- Changes in species distributions (P) - Air Pollution: risk of atmospheric nitrogen deposition (P)	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,

Site Name	Site Size (ha)	Approx. Distance/ orientation from Site	Summary of reasons for designation summarised on Natura 2000 Standard Data Form or Ramsar Information Sheet ¹⁶¹⁷¹⁸¹⁹	Activities with greatest effect upon the site, as listed on Natura 2000 Standard Data Form or Ramsar Information Sheet	Pressures and threats listed within the Site Improvement Plan (NE, undated) (T=Threat, P=Pressure) ²⁰²¹	Conservation Objectives
						The distribution of the qualifying features within the site
River Avon SAC	417	2.24 km W	- Annex I habitats which are a primary reason for selection of this site: - H3260 Water courses of plain to montane levels with the <i>Ranunculus fluitantis</i> and <i>Callitriche-Batrachion</i> vegetation - Annex II species that are a primary reason for selection of this site: - I1016 Desmoulin's whorl snail, <i>Vertigo moulinsiana</i> - F1095 Sea lamprey, <i>Petromyzon marinus</i> - F1096 Brook lamprey, <i>Lampetra planeri</i> - F1106 Atlantic salmon, <i>Salmo salar</i> - F1163 Bullhead, <i>Cottus gobio</i>	Negative impacts (Threats and pressures: - M02 Changes in biotic conditions. - H02 Pollution to groundwater (point sources and diffuse sources) - J02 Human induced changes in hydraulic conditions Positive Impacts Activities, management: - A02 Modification of cultivation practices - A04 Grazing - A06 Annual and perennial non-timber crops - B02 Forest and Plantation management & use	- Physical modification (P) - Siltation (P) - Water Pollution (P/T) - Water abstraction (P/T) - Changes in species distributions (P) - Invasive species (P/T) - Public Access/Disturbance (P) - Hydrological changes (T) - Inappropriate weed control (T) - Change in land management (T)	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

Site Name	Site Size (ha)	Approx. Distance/ orientation from Site	Summary of reasons for designation summarised on Natura 2000 Standard Data Form or Ramsar Information Sheet ¹⁶¹⁷¹⁸¹⁹	Activities with greatest effect upon the site, as listed on Natura 2000 Standard Data Form or Ramsar Information Sheet	Pressures and threats listed within the Site Improvement Plan (NE, undated) (T=Threat, P=Pressure) ²⁰²¹	Conservation Objectives
					Habitat fragmentation	
Porton Down SPA	1562.32	6.70 km SE	- Species for which the designation has been implemented: - Stone curlew <i>Burhinus oedichnemus</i> (breeding)	Negative impacts (Threats and pressures: - H04 Air pollution, air-borne pollutants - M02 Changes in biotic conditions. Positive Impacts Activities, management: - None listed	- Changes in species distributions (P) - Air Pollution: risk of atmospheric nitrogen deposition (P)	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 populations of each of the qualifying features, and The distribution of qualifying features within the site

4 STAGE 1: SCREENING OF POTENTIAL EFFECTS

4.1 HABITATS SITE MANAGEMENT STATEMENT

- 4.1.1. The Proposed Development is not directly connected with, or necessary for, the management of any of the Habitats Sites listed in **Table 3-1**. It has not been conceived solely to further the conservation of the Habitats Sites, nor is it essential to their management. Therefore, further consideration of the Proposed Development within the HRA process is required.

4.2 CONSIDERATION OF EFFECTS

OVERVIEW

- 4.2.1. Utilising the information included within **Section 3**, the Proposed Development has been screened to identify whether potential impact pathways are likely to result in significant effects upon the Habitats Sites. This process has been undertaken considering the Proposed Development in isolation and in the absence of mitigation, with the results of this screening assessment set out in Table 3-1.
- 4.2.2. The Habitats Site's vulnerability information, summarised in **Table 3-1**, has been used to assist in identifying potential impacts and effects. The impacts included within **Table 4-1** are made with reference to relevant attributes discussed in supplementary advice for Habitats Sites from Natural England, and comprise the following:

CONSTRUCTION PHASE

- Land take – direct loss of land within the borders of a Habitats Site or of an area outside of a Habitats Site that considered to be functionally linked. Loss can be determined as an impact on connectivity, extent and distribution, nesting provision and food availability.
- Disturbance – increased risk of disturbance to qualifying features of the Habitats Sites through noise, vibration and visual disturbance during site clearance and construction from an increased presence of people and vehicles, operation of machinery, demolition and construction activities and lighting.
- Pollution/contaminants – run-off associated with isolated pollution events from construction plant or machinery.
- Air quality – an increased risk of dust and air pollution to levels that may detrimentally impact habitat quality, due to movement of machinery and vehicle emissions.

OPERATION PHASE

- Increased recreational disturbance – an increase in recreational disturbance from people residing in the new accommodation accessing the Habitats Sites for recreational purposes (dog walking, jogging etc).
- Water quality – potential to cause an increase in nutrient loads on Habitats Sites adversely affected by nitrogen and/or phosphorus enrichment through the introduction of additional residents/contaminants into the catchment and the potential this creates to increase pollution load

from wastewater requirements. Note, this is only a potential impact pathway for the River Avon SAC.

- 4.2.3. Desk study data and UK Habitat Classification (UKHab) survey results obtained to inform a PEA for the Proposed Development² have also been used to inform the consideration of effects. The desk study exercise included the purchase of bird species records for a 2km radius around the Site from Wiltshire and Swindon Biological Records Centre (WSBRC). The results of the desk study exercise and UKHab survey are included where relevant throughout this section, with the results of the UKHab survey for the Site presented on **Figure 3**.
- 4.2.4. Relevant threats and pressures identified for the Habitats Sites identified in **Table 3-1**, have been considered against impacts of the Proposed Works, and information included within **Section 3** of this report, to screen for LSE on Qualifying interests and their Conservation Objectives.
- 4.2.5. Results of this screening process for impacts identified are presented in **Table 4-1**.

Table 4-1 - Screening of Likely Significant Effects

Habitats Sites	Potential Impact Pathway	Screening	LSE
Salisbury Plains SAC	Land take (construction)	The Proposed Development will be entirely confined to the Site, which is located on the outskirts of Bulford Camp, specifically west of Sling Road, approximately 0.13km from the boundary of the SAC. Given the proximity to Site and the sub optimal time of year for the initial UKHab survey to determine the classification of the grassland, the potential of the Site to support qualifying Annex II species (marsh fritillary butterfly) cannot be ruled out. The PEA recommends further surveys, the results of which will be required to determine if the Site is functionally linked land for the Salisbury Plain SAC and therefore are needed to inform the stage 2 appropriate assessment.. Thus, LSE cannot be ruled out at this stage.	Yes
	Disturbance (construction)	The Proposed Development is likely to give rise to a temporary increase in noise, vibration and visual disturbance as a result of site clearance and construction activities. Works will be confined to the Site which is 0.13km from the SAC at its closest point. Furthermore, the Site is separated from the SAC by woodland which will provide a level of screening that will reduce any disturbance impacts reaching the SAC. Salisbury Plain SAC is in part designated for populations of marsh fritillary butterfly. Whilst the works are temporary it has not been fully established whether the habitat present is likely to support the qualifying species and/or be functionally linked and therefore any screening provided by distance or the obscuring woods between the Site an SAC cannot be relied upon to positively rule out disturbance. Therefore, LSE cannot be ruled out.	Yes
	Pollution/contaminants (construction)	There is the potential for accidental spillage of chemicals to occur during construction, for example during refuelling of machinery. Should this reach the SAC through groundwater or any watercourses hydrologically linked to the SAC, pollution of Salisbury Plains SAC has the potential to detrimentally impact the qualifying habitats and species by altering the soil composition through introduction of contaminants. No aquatic habitat is present within the Site to provide hydrological connectivity, however, the Site is within 300m of the Nine Mile River, which rises within Salisbury Plain near Brigmerston Down before flowing south-west to Bulford. Notwithstanding this, neither the Nine Mile River nor its associated ponds	Yes

Habitats Sites	Potential Impact Pathway	Screening	LSE
		are noted in the Supplementary Advice on Conservation Objectives for Salisbury Plain, nor are they identified as supporting habitats or functionally linked for the SAC qualifying features. Furthermore, no species associated with these aquatic habitats (or likely to be associated) are identified as typical species of the SAC. However, due to the proximity of the SAC (0.13km), direct run-off from the Site into the SAC, causing damage through contaminants to qualifying features or functionally linked land is possible. As such, LSE cannot be ruled out.	
	Air quality (construction)	During construction works, there is potential for a temporary increase in vehicle emissions and dust to be produced. Atmospheric pollution is a recognised threat for the SAC with the qualifying habitats sensitive to changes in air quality. Exceedances in pollutants have the potential to modify the chemical status of the soils, accelerating or damaging plant growth and altering vegetation structure and composition. According to LA115 of the Design Manual for Roads and Bridges (DMRB), <i>"If construction activities are less than 2 years it is unlikely that the construction activities would constitute a significant air quality effect or impinge on the UK's reported ability to comply with the Air Quality Directive [Ref 4.N] given the short term duration of the construction activities as opposed to the long term operation of the project."</i> The construction of the Proposed Development will not exceed 2 years. Furthermore, it is confined to the Site which is 0.13km from the SAC at its closest point with the majority of the qualifying habitats located much further away. As such, LSE related to vehicle emissions can be ruled out. Deposition of dust onto qualifying habitats has the potential to degrade habitat quality. While the extent and duration of these activities are not expected to result in significant airborne pollution, it is possible that construction works could result in dust pollution reaching the SAC. Guidance within the DMRB²² recommends an air quality assessment for Nitrogen (Section 2.25) and dust (Section 2.56 and 2.57) on designated sites:	Yes

²² <https://www.standardsforhighways.co.uk/search/html/af7f4cda-08f7-4f16-a89f-e30da703f3f4?standard=DMRB> (LA 105 Air quality (vertical barriers) - accessed 23.01.2026)

Habitats Sites	Potential Impact Pathway	Screening	LSE
		- Internationally, nationally and locally designated sites of ecological conservation importance on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity (known as designated habitats), within 200 m of the ARN (Affected Road Network), shall be included in the air quality assessment - The construction dust assessment shall determine the construction dust risk potential of the project to the receiving environment, which informs the appropriate level of mitigation. While this guidance is primarily associated with roads it is considered good practice to include for Projects involving roads and the creation of construction dust/air quality from the temporary increase in local vehicles (heavy plant and Site personnel etc) projected as part of the Proposed Development. As such, there is potential for dust pollution to cause LSE due to the proximity of the Site to the SAC.	
	Air quality (operation)	The Proposed Development comprises the construction of new residential dwellings, which could increase the number of movements annually on the local road network surrounding the SAC. Increased numbers of local journeys could result in raised levels of nitrogen deposition on sensitive habitats within the SAC. However, the Proposed Development will only see a small increase in the number of dwellings (eight) which is unlikely to result in an increase to annual average daily traffic (AADT) above the threshold criteria (>1,000 vehicles on the local road network), in accordance with guidance set out in LA115 of the DMRB. As such, no likely significant effects associated with increased traffic during the operational phase are anticipated.	No
	Increased recreational disturbance (operation)	The Proposed Development is for an increase in residential accommodation within close proximity to the SAC. There is an extensive network of public rights of way on Salisbury plain that, given the proximity of the Site, it can be anticipated that new residents would make use of. The Wiltshire Local Plan Review HRA uses a zone of influence for recreational disturbance, based on evidence from visitor surveys, of 6.4km for the SAC. The habitat qualifying features are vulnerable to recreational disturbance through erosion and trampling and associated impacts such as fire and vandalism. However, the SACO highlights military vehicle disturbance as the main contributing factor to this pressure. Increased recreational pressure is not	Yes

Habitats Sites	Potential Impact Pathway	Screening	LSE
		listed as a threat or pressure in the SIP. Notwithstanding this, following the precautionary principle embedded in the HRA process, there remains some potential for a LSE.	
Salisbury Plains SPA	Land take (construction)	The Proposed Development will be entirely confined to the Site which is located on the outskirts of Bulford Camp, specifically west of Sling Road, approximately 0.13km from the boundary of the SPA. However, whilst the Site is outside of the boundary of the SPA, given the proximity of the Site to the SPA, if habitats on and adjacent to the Site are considered to be supporting habitat (also known as functionally linked land) then there is still the potential for LSE. The SACO for the SPA targets the maintenance of the extent, distribution and connectivity of supporting habitat for the qualifying species both within and outside the SPA, as key to maintaining the SPA's ability and capacity to support the bird populations. Salisbury Plains SPA is designated for qualifying species of breeding quail, hobby, stone curlew and non-breeding hen harrier. As such, supporting habitat in the context of Salisbury Plains SPA is considered to be;²³ ▪ heathland (hobby, hen harrier and stone curlew) ▪ wetland (hobby and hen harrier) ▪ broadleaved woodland (hobby only) including trees of a diameter of more than 60cm near the edges of woodland ▪ grassland (stone curlew and other species to a lesser extent); and ▪ arable farmland (stone curlew and quail). The Site is primarily composed of unimproved grassland with individual trees, some scrub, hardstanding and woodland to the south, northwest and west. The wider area consists of some hardstanding and gardens (dwellings, gardens and pavement). Beyond the Site are fields and calcareous grasslands surrounding the Nine Mile River. Grassland is present in the wider area elsewhere but is heavily managed/mowed. Given the distance between the SPA and the Site as well	Yes

²³ [Wiltshire Local Plan Review Habitats Regulations Assessment - Appropriate Assessment](#) (accessed 26.01.2026)

Habitats Sites	Potential Impact Pathway	Screening	LSE
		as the possible supportive habitat within the Site (individual trees and woodland on the boundary may support hobby and grassland may support stone curlew) and connecting the two, the Site could act as functionally linked land and therefore LSE cannot be ruled out.	
	Disturbance (construction)	The Proposed Development is likely to give rise to a temporary increase in noise, vibration and visual disturbance as a result of site clearance and construction activities. Works will be confined to the Site which is 0.13km from the SPA at its closest point, although the Site is separated from the SPA by woodland which will provide a level of screening that will reduce any disturbance impacts reaching the SPA. Notwithstanding this, as detailed in the row above, parts of the Site and immediate surrounds could provide supporting habitat for the designated bird species. Salisbury Plain SPA is designated for European hobby, quail, stone curlew and hen harrier. The HRA undertaken for the latest iteration of the Wiltshire Local Plan²⁴, currently under review, has assumed that effects of noise, vibration and light pollution from construction are capable of causing an adverse effect if development takes place within 500m of a Habitats Site that supports bird qualifying features. This is extended to Habitats Sites where stone curlew is a qualifying feature (due to lower densities of breeding) to within 1.5km of settlements²⁵. As such, the Proposed Development has the potential to cause LSE.	Yes
	Pollution/contaminants (construction)	There is the potential for accidental spillage of chemicals to occur during construction, for example during refuelling of machinery. Should this reach the SPA habitats through groundwater or any watercourses hydrologically linked to the SPA, pollution of Salisbury Plains SPA has the potential to detrimentally impact the qualifying habitats and species by altering the soil composition through introduction of contaminants. No aquatic habitat is present within the Site to provide hydrological links, however the Site is within 300m of the Nine Mile River, which rises within Salisbury Plain near Brigmerston Down before flowing	Yes

24 LUC (2024) Wiltshire Local Plan Review Habitats Regulations Assessment. Available at:
[Local Plan HRA Report Final Report September 2024.pdf](#)

25 Footprint Ecology (2013) Further assessments of the relationship between buildings and stone-curlew distribution.

Habitats Sites	Potential Impact Pathway	Screening	LSE
		south-west to Bulford. Notwithstanding this, neither the Nine Mile River nor its associated ponds are noted in the SACO for Salisbury Plain, nor are they identified as supporting habitats or functionally linked for the SPA qualifying features. Furthermore, no species associated with these aquatic habitats (or likely to be associated) are identified as typical species of the SPA. However, due to the proximity of the SAC (0.13km), direct run-off from the Site into the SPA, causing damage through contaminants to qualifying features or functionally linked land is possible. As such, LSE cannot be ruled out.	
	Air quality (construction)	During construction works, there is potential for a temporary increase in vehicle emissions and dust to be produced. Atmospheric pollution is a recognised threat for the SPA with the habitats on which the qualifying species rely sensitive to changes in air quality. Exceedances in pollutants have the potential to modify the chemical status of the soils, accelerating or damaging plant growth and altering vegetation structure and composition. According to LA115 of the Design Manual for Roads and Bridges (DMRB), <i>"If construction activities are less than 2 years it is unlikely that the construction activities would constitute a significant air quality effect or impinge on the UK's reported ability to comply with the Air Quality Directive [Ref 4.N] given the short term duration of the construction activities as opposed to the long term operation of the project."</i> The Proposed Development will not exceed 2 years. Furthermore, it is confined to the Site which is 0.13km from the SPA at its closest point with the majority of the site located much further away. As such, LSE related to vehicle emissions can be ruled out. Deposition of dust onto habitats has the potential to degrade habitat quality on which the qualifying species rely. While the extent and duration of these activities are not expected to result in significant airborne pollution, it is possible that construction works could result in dust pollution reaching the SPA. Deposition of dust onto qualifying habitats has the potential to degrade habitat quality. While the extent and duration of these activities are not expected to result in significant airborne pollution, it is possible that construction works could result in dust pollution reaching the SAC. Guidance within the DMRB²² recommends an air quality assessment for Nitrogen (Section 2.25) and dust (Section 2.56 and 2.57) on designated Sites for both dust and nitrogen.	Yes

Habitats Sites	Potential Impact Pathway	Screening	LSE
		- Internationally, nationally and locally designated sites of ecological conservation importance on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity (known as designated habitats), within 200 m of the ARN (Affected Road Network), shall be included in the air quality assessment - The construction dust assessment shall determine the construction dust risk potential of the project to the receiving environment, which informs the appropriate level of mitigation. While this guidance is primarily associated with roads it is considered good practice to include for Projects involving roads and the creation of construction dust/air quality from the temporary increase in local vehicles (heavy plant and Site personnel etc) projected as part of the Proposed Development. As such, there is potential for dust pollution to cause LSE.²⁰Error! Bookmark not defined.	
	Increased recreational disturbance (operation)	The Proposed Development is for an increase in residential accommodation within close proximity to the SPA. There is an extensive network of public rights of way on Salisbury plain that, given the proximity of the Site, it can be anticipated that new residents would make use of. The Wiltshire Local Plan Review HRA²⁶ uses a zone of influence for recreational disturbance, based on evidence from visitor surveys, of 6.4km for the SPA. The qualifying bird species of the SPA are susceptible to recreational disturbance from walking, dog walking and illegal off-road vehicles, and the habitats on which they rely from associated erosion and trampling and related impacts such as fire and vandalism. Disturbance can cause a natural threat response in birds leading to excessive energy expenditure, abandonment of nests and/or suitable breeding areas; reducing breeding success, impacting bird survival rates and ultimately contributing to population decline. As a ground nesting bird, stone curlew is particularly vulnerable to this threat. As such, LSE cannot be ruled out.	Yes
River Avon SAC	Land take (construction)	The Proposed Development will be entirely confined to the Site located on the outskirts of Bulford Camp, specifically west of Sling Road which is 2.24km from the River Avon SAC at its closest point. Furthermore, the Site does not support any habitats associated with the SAC or its qualifying features and, as such, would not be considered to act as functionally linked land.	No

²⁶ Wiltshire Council (2024) Wiltshire Local Plan Review Habitats Regulations Assessment Appropriate Assessment.

Habitats Sites	Potential Impact Pathway	Screening	LSE
		Given the scale and nature of the works, the distance from the Site and the habitats present on Site, LSE in respect of land take can be ruled out.	
	Disturbance (construction)	The qualifying fish species of the River Avon SAC are sensitive to disturbance in the form of noise, vibration and increased light spill and Desmoulin's whorl snail is sensitive to increases in vibration. However, the Site is located 2.24km from the SAC at its closest point, a sufficient distance for these impacts not to be a consideration. Notwithstanding this, the Site is located approximately 300m from the Nine Mile River, a tributary of the River Avon and listed in the SACO for the SAC as '<i>integral to the natural functioning of the whole river system and also support the habitats and species for which the site was notified</i>' The Wiltshire Local Plan Review HRA uses 500m as the zone of influence for disturbance effects for the River Avon SAC. As the functionally linked Nine Mile River is within this zone of influence, LSE cannot be ruled out.	Yes
	Pollution/contaminants (construction)	There is the potential for accidental spillage of chemicals to occur during construction, for example during refuelling of machinery. Should this reach the River Avon SAC it has the potential to detrimentally impact the qualifying habitats and species through introduction of contaminants. No aquatic habitat is present within the Site, however, the Site is within 300m of the Nine Mile River, which is a tributary of the River Avon and considered within the SACO for the River Avon to be functionally linked.	Yes
	Air quality (construction)	During construction works, there is potential for a temporary increase in vehicle emissions and dust to be produced. The SACO for the River Avon SAC identifies the habitat for which the SAC is designated and the habitats on which the qualifying species rely to be habitat types considered sensitive to changes in air quality. Exceedances in pollutants have the potential to modify the chemical status of the substrate, accelerating or damaging plant growth, altering vegetation structure and composition and causing the loss of sensitive typical species associated with them. According to LA115 of the Design Manual for Roads and Bridges (DMRB), "<i>If construction activities are less than 2 years it is unlikely that the construction activities would constitute a significant air quality</i>	Yes

Habitats Sites	Potential Impact Pathway	Screening	LSE
		<i>effect or impinge on the UK's reported ability to comply with the Air Quality Directive [Ref 4.N] given the short term duration of the construction activities as opposed to the long term operation of the project."</i> The Proposed Development will not exceed 2 years. Furthermore, it is confined to the Site which is 2.24km from the SAC at its closest point. The DMRB also states that air pollution from roads is unlikely to be significant beyond 200m. The functionally linked Nine Mile River is also over 200m from the Site. As such, LSE related to vehicle emissions can be ruled out. Deposition of dust onto habitats has the potential to degrade habitat quality on which the qualifying species rely. Guidance within the DMRB indicates that impacts should be considered where dust emissions are expected to be low but present within 200m of a Habitats site²². However, dust has the potential to contain contaminants that is at risk of remaining in the surrounding habitat and therefore being picked up as part of flooding events. In the absence of dust mitigation measures therefore LSE relating to dust pollution to the SAC, through the functionally linked Nine Mile River, cannot be ruled out.	
	Increased recreational disturbance (operation)	The Proposed Development is for an increase in residential accommodation. While recreational pressure is not listed as a threat or pressure for the qualifying features of the River Avon SAC, there is the potential that residential development could lead to an increase in public access to the river through leisure activities including fishing, water sports and walking, with associated trampling of habitats or disturbance to qualifying features. The limited scale of the Proposed Development, with just eight dwellings, is not expected to significantly increase recreational disturbance above baseline levels. In addition, while there is some limited access to the river banks available in local parks and urban areas in the broader locale, the majority of the river appears to flow through private land with no major car parks for public access. As such no significant impact pathway is present and LSE can be ruled out.	No
	Water quality (operation)	The River Avon SAC is currently adversely affected by phosphorous enrichment. Diffuse pollution from, inter alia, sewage treatment works discharges are contributing to elevated levels of nutrients and dissolved oxygen levels in parts of the SAC. As the Proposed Development is for an increase in residential properties, this has the potential to increase nutrient inputs from wastewater into the	Yes

Habitats Sites	Potential Impact Pathway	Screening	LSE
		catchment. In line with the requirements of the Habitats Regulations, new developments in the catchments of already impacted Habitats Sites must achieve nutrient neutrality to remove any uncertainty as to whether new growth will further deteriorate the designated site²⁷. Foul flows from the Proposed Development will be treated at Wessex Water's Ratfyn sewage treatment works which discharges treated effluent into the River Avon catchment. Nutrient load calculations carried as part of the nutrient neutrality assessment indicate that the Proposed Development will produce a total phosphorous load of 0.84kg/year pre-2030 and 0.16 kg/year post-2030.²⁸ Therefore, without mitigation, the Proposed Development will increase the phosphorous load in the River Avon catchment and will not achieve phosphorous neutrality.	
Porton Down SPA	Land take (Construction)	The Proposed Development will be entirely confined to the Site, which is located on the outskirts of Bulford Camp, specifically west of Sling Road, approximately 6.7km from the boundary of the SPA. The SACO for the SPA targets the maintenance of the extent, distribution and connectivity of supporting habitat for the qualifying species both within and outside the SPA, as key to maintaining the SPA's ability and capacity to support the bird population. Porton Down SPA is designated for breeding stone curlew. As such, supporting habitat in the context of Porton Down SPA is considered to be heathland, grassland and arable farmland.	No

27 Ricardo and Natural England (2022) Nutrient Neutrality Generic Methodology. NECR459. Natural England. Available at: <https://publications.naturalengland.org.uk/publication/5143927928913920>

28 2030 is the date by which the Ratfyn sewage treatment works will be upgraded to achieve a Technically Achievable Limit (TAL) for total phosphorous of 0.25mg/l.

Habitats Sites	Potential Impact Pathway	Screening	LSE
		Green et al (2006) ²⁹ noted that stone curlews travel up to about 3km from their nest to forage whilst Hawkes et al (2021) ³⁰ found that 90% of foraging locations were within 1km during the nesting period and 90% within 5km of the day-roost post-breeding. Whilst they did record the longest distance travelled as 13km post-breeding, it is reasonable to assume that the Site is unlikely to represent functionally linked land for the Porton Down stone curlews given the distance, relatively small size of the Site and the presence of major infrastructure (including A roads and railways) between the Site and Porton Down SPA. As such LSE can be ruled out.	
	Disturbance (Construction)	Qualifying species present within Porton Down SPA (Stone curlews - breeding) are at risk of disturbance while nesting from noise, vibration and increased presence of people arising from construction activities. Porton Down SPA is located 6.7km from the Site, separated by urban development and infrastructure (A roads and railways lines). Due to the scale and nature of the Proposed Development, the distance to the SPA and the barriers between the Site and SPA, it is not considered that an impact pathway for construction derived disturbance is present. Furthermore, as detailed above, it is not considered that the Site represents functionally linked land for the SPA. As such LSE can be ruled out.	No
	Pollution/contaminants (Construction)	There is the potential for accidental spillage of chemicals to occur during construction, for example during refuelling of machinery. Should this reach the Porton down SPA it has the potential to detrimentally impact the qualifying species and the habitats on which it relies through introduction of contaminants The distance between the Site and the SPA is such that any pollution events would not impact the SPA and the Site is not considered to act as functionally linked land for the SPA. Furthermore, there is no direct connectivity to Porton Down SPA through any hydrological corridors with all waterbodies that are	No

29 Green, R. E., Tyler, G. A. and Bowden, C. G. R. (2006) Habitat selection, ranging behaviour and diet of the stone curlew (*Burhinus oedicnemus*) in southern England. Journal of Zoology 250(2): 161-183

30 Hawkes, R. W., Smart, J., Brown, A., Green, R. E., Jones, H. and Dolman, P. M. (2021) Effects of experimental land management on habitat use by Eurasian stone-curlews. Animal Conservation 24(5): 743-755

Habitats Sites	Potential Impact Pathway	Screening	LSE
		part of the wider hydrological network near Porton Down SPA flowing into the River Avon at Salisbury, south-west of the SPA. As such LSE can be ruled out	
	Air quality (Construction)	During construction works, there is potential for a temporary increase in vehicle emissions and dust to be produced. Atmospheric pollution is a recognised threat for the SPA with the habitats on which the qualifying species relies sensitive to changes in air quality. Exceedances in pollutants have the potential to modify the chemical status of the soils, accelerating or damaging plant growth and altering vegetation structure and composition. The Proposed Development is separated from the SPA by a minimum distance of 6.7km and therefore it is considered reasonably unlikely that temporary emissions associated with construction traffic will detrimentally affect the quality of the habitats on which the SPA species rely. Deposition of dust onto habitats has the potential to degrade habitat quality on which the qualifying species relies. Guidance within the DMRB indicates that impacts should be considered where dust emissions are expected to be low but present within 200m of a Habitats site. As the distance from the Site to the SPA is 6.7km it can be concluded there is no potential for dust pollution to cause LSE.	No
	Increased recreational disturbance (operation)	As a ground nesting bird, stone curlew is highly susceptible to recreational disturbance from walking, dog walking and illegal off-road vehicles, and the habitats on which it relies from associated erosion and trampling and related impacts such as fire and vandalism. Disturbance can cause a natural threat response in birds leading to excessive energy expenditure, abandonment of nests and/or suitable breeding areas; reducing breeding success, impacting bird survival rates and ultimately contributing to population decline. Whilst the Proposed Development is for an increase in residential accommodation, there is no public access to Porton Down SPA and therefore no impact pathway present.	No

4.3 IN-COMBINATION EFFECTS

- 4.3.1. As the HRA needs to progress to Stage 2, an in-combination assessment has not been undertaken at Stage 1. This will be required following the conclusions of the Stage 2 assessment.

5 RECOMMENDATIONS

- 5.1.1. Table 2-1 identified LSE on Habitats Sites for six potential impact pathways:
- LSE due to land take (functionally linked land) from the Salisbury Plain SAC and SPA;
 - LSE from air quality due to an increase in dust for River Avon SAC and Salisbury Plain SAC and SPA;
 - LSE due to accidental pollution events (run-off) for the River Avon SAC and Salisbury Plain SAC and SPA;
 - LSE from construction derived disturbance to the River Avon SAC and Salisbury Plain SAC and SPA;
 - LSE due to increased recreational disturbance at the Salisbury Plain SAC and SPA; and
 - LSE on water quality (nutrient neutrality) of the River Avon SAC.
- 5.1.2. As such, a Stage 2 – Appropriate Assessment is required to assess the likely significant effects of the Proposed Development, both alone and in-combination, on the integrity of the Habitats Sites listed above for those impact pathways where LSE at screening could not be ruled out. This assessment will also consider and recommend appropriate mitigation measures. As the HRA needs to progress to Stage 2, an in-combination assessment has not been undertaken at Stage 1. This will be required following the conclusions of the Stage 2 assessment.
- 5.1.3. The PEA undertaken for the Site has recommended further survey to determine the use of the Site by stone curlew and to determine the nature of the grassland present on Site. It is recommended that the Stage 2 appropriate assessment incorporates the results of these surveys as this will help determine whether the Site does act as functionally linked land for the Salisbury Plain SAC and SPA and therefore is integral to the conclusions of the appropriate assessment.

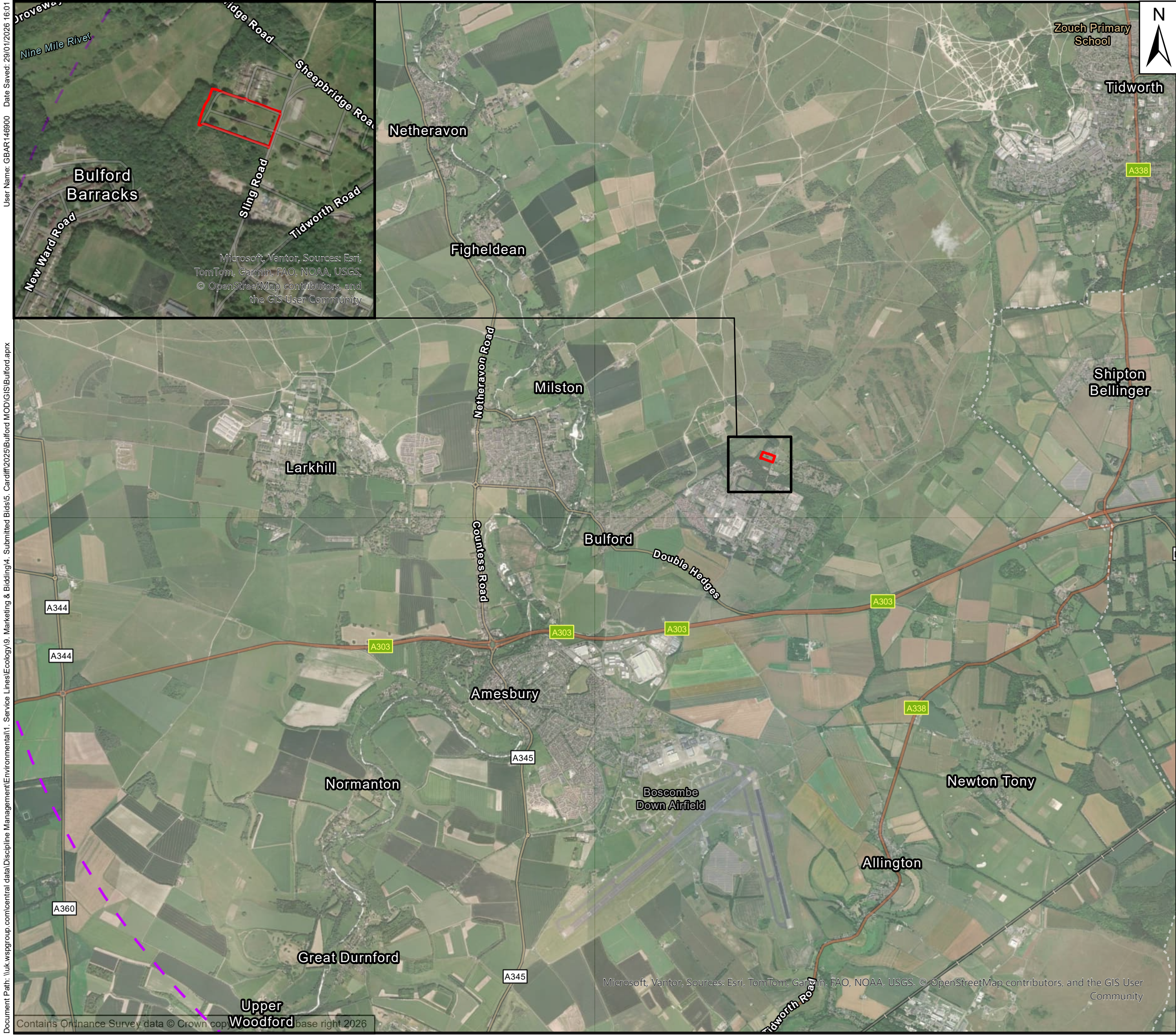
6 FIGURES

Figure 1 – Site Location Plan

Figure 2 – Habitats Sites within the Zone of Influence

Figure 3 – UKHAB Plan of Site

Figure 4 - Hydrological Connectivity of Site to Wider Area



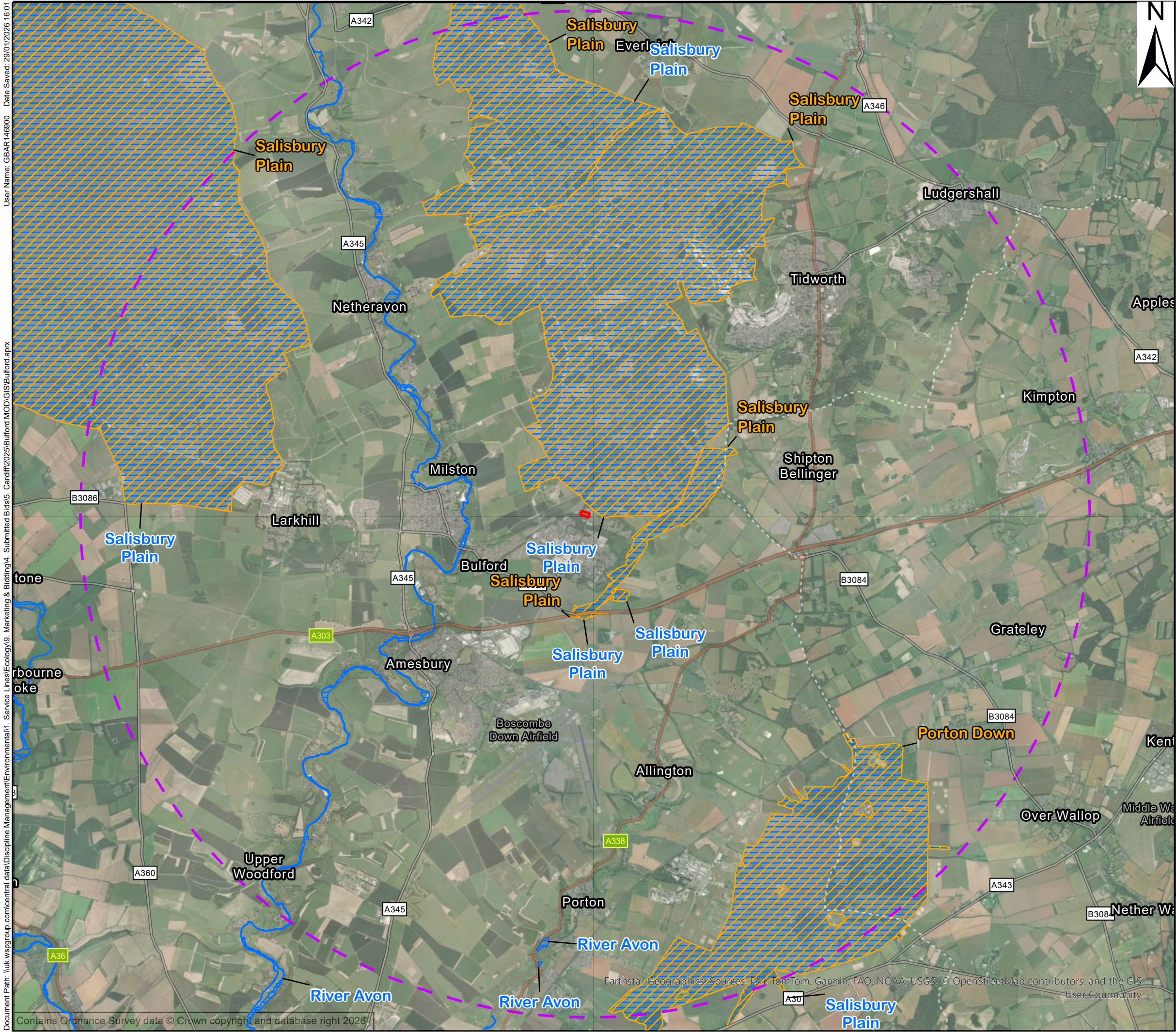
Site boundary

0 500 1,000 1,500 2,000 2,500 Metres



Client:	Defence Infrastructure Organisation		
Project:	SERVICE FAMILIES ACCOMMODATION MODEL HOMES DEVELOPMENT SLING ROAD, BULFORD		
Title	Site Location Plan		
Drawing No:	Figure 1	Drawn:	AR
Date:	January 2026	Checked:	LB
Scale:	1:8,115	Approved:	KT

User Name: GBAR146900 Date Saved: 26/01/2026 16:01
Document Path: \\uk.wspgroup.com\central\data\Discipline Management\Environmental\1. Service Lines\Ecology\9. Marketing & Bidding\4. Submitted Bids\5. Cardiff\2025\Bulford MOD\GIS\Bulford.aprx





 Site boundary

 10km Search Area

 Special Area of Conservation

 Special Protection Area

0

1

2

3

Kilometers



Client:

Defence Infrastructure Organisation

Project:

SERVICE FAMILIES ACCOMMODATION MODEL
HOMES DEVELOPMENT
SLING ROAD, BULFORD

Title:

Habitat Sites within Zone of Influence

Drawing No:

Figure 2

Date:

January 2026

Scale:

1:73,239

Drawn:

AR

Checked:

LB

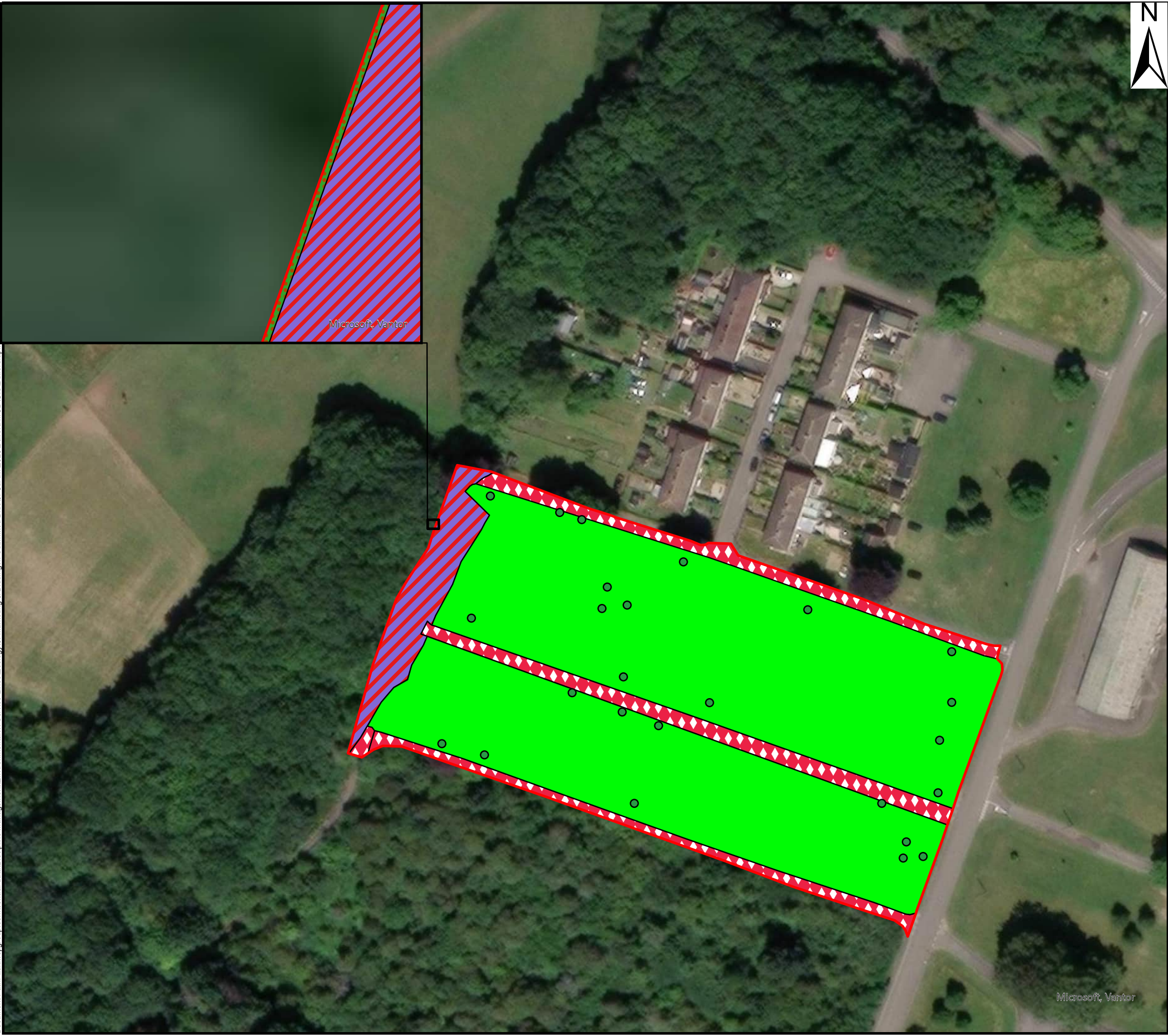
Approved:

KT

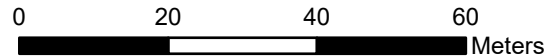
Earthstar Geographics, Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community

Contains Ordnance Survey data © Crown copyright and database right 2026.

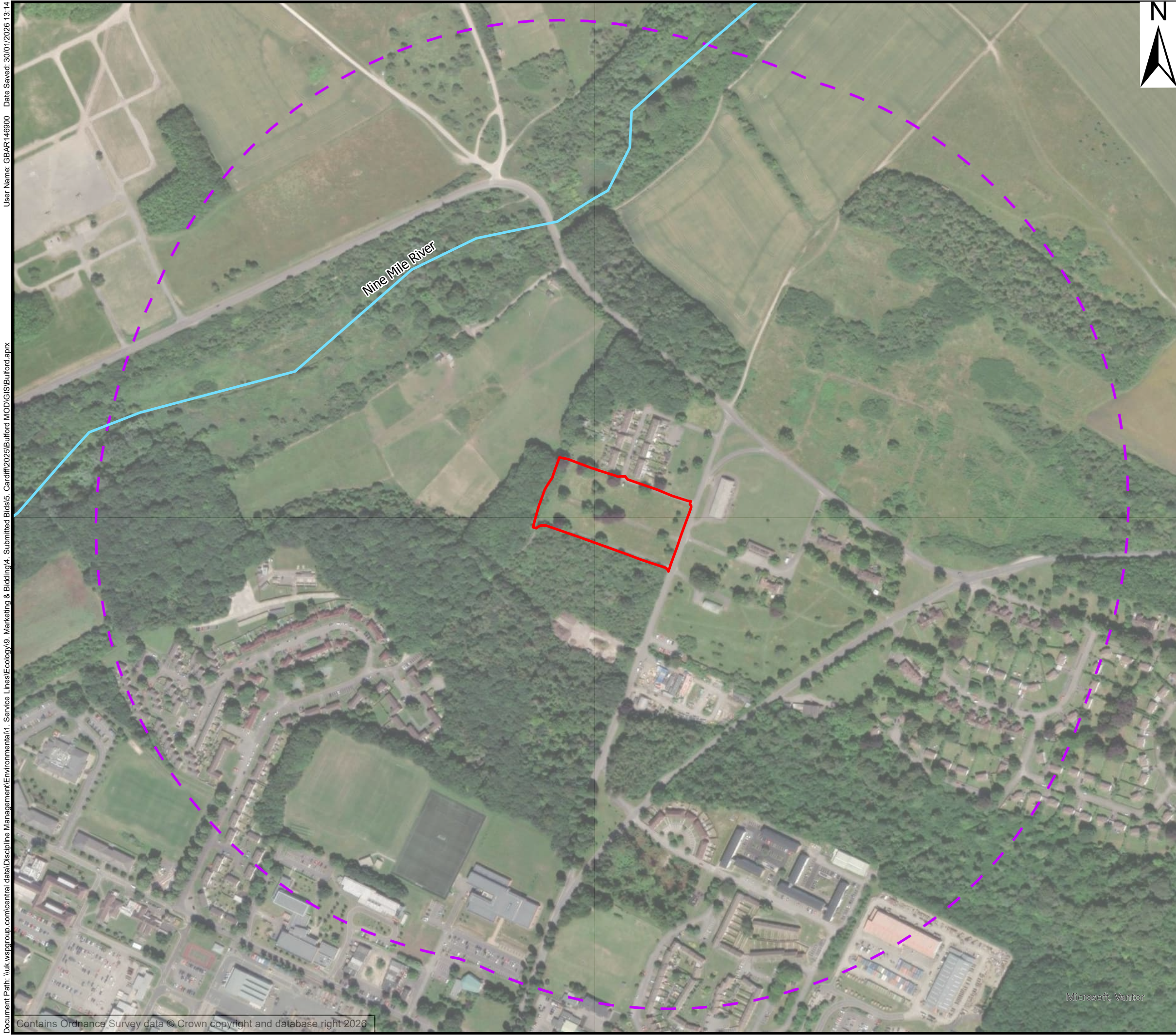
User Name: GBAR146900 - Date Saved: 30/01/2026 13:40
Document Path: \\uk.wspgroup.com\\central data\\Discipline Management\\Environmental\\1. Service Lines\\Ecology\\9. Marketing & Bidding\\4. Submitted Bids\\5. Cardiff2025\\Bulford MOD\\GIS\\Bulford.aprx



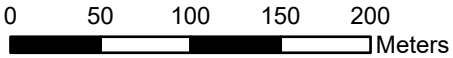
-  Site boundary
-  g4 - modified grassland
-  h3 - dense scrub
-  u1b6 - other developed land
-  w1g - other woodland, broadleaved
-  Individual trees



Client:		Defence Infrastructure Organisation	
Project:		SERVICE FAMILIES ACCOMMODATION MODEL HOMES DEVELOPMENT SLING ROAD, BULFORD	
Title		UKHab Plan of Site	
Drawing No:	Figure 3	Drawn:	AR
Date:	February 2026	Checked:	LB
Scale:	1:1,016	Approved:	KT



-  Site boundary
-  500m Search Area
-  Waterbodies



Client:
Defence Infrastructure Organisation

Project:
SERVICE FAMILIES ACCOMMODATION MODEL
HOMES DEVELOPMENT
SLING ROAD, BULFORD

Title
Hydrological Connectivity
of Site to Wider Area

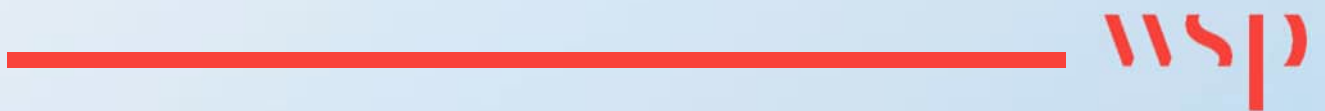
Drawing No: Figure 4
Date: January 2026
Scale: 1:4,200

Drawn: AR
Checked: LB
Approved: KT

Microsoft, Vantor

Appendix A

CJEU RULINGS



The Council for Justice of the European Union rulings

A number of CJEU rulings are relevant to the HRA screening exercise and are noted below.

The Wealden Judgement

The Wealden Judgement³¹, handed down in March 2017, has introduced additional complexities into the assessment process in relation to in-combination and cumulative effects.

Prior to this Judgement, air quality impacts on Habitats Sites were only considered alongside roads where the traffic growth associated with the individual Plan or Proposed Development being assessed exceeded specified screening criteria. These criteria were typically based on changes in vehicle movements and taken from the Design Manual for Roads and Bridges (DMRB, HA207/07³²), namely: increases of 1000 vehicles per day or 200 Heavy Goods Vehicles per day (as Annual Average Daily Traffic (AADT)).

The Wealden Judgement means that every single plan or project which, alone, is predicted to give rise to any increase in traffic or other air emission (however small) must be subjected to an in-combination assessment with other plans or projects (which would include those plans or projects with a similar tiny impact). However, the judgement did not rule out the application of thresholds in principal and this approach is normally taken as the basis of the assessment.

The judgement has led to a more detailed analysis of three key questions to discern which plans and project are those where a detailed “in combination” assessment is required in relation to changes in air quality³³:

1. Is your plan or project putting emissions into the air?;
2. If so, are those emissions at a level where they could actually be measured / perceived?; and,
3. If so, is there a realistic (rather than hypothetical) risk that those emissions, alone, will have an adverse effect on the ecology of a SAC / SPA?

A fuller justification will be required when applying the threshold approach.

People over Wind (The Sweetman Case)

The Court of Justice of the European Union's (CJEU's) decision in the matter of People Over Wind and Sweetman v Coillte Teoranta (C-323/17) (hereafter referred to as the 'Sweetman Case')³⁴, states that:

'Article 6(3) must be interpreted as meaning that, in order to determine whether it is necessary to carry out, subsequently, an Appropriate Assessment of the implications, for a site

³¹ Judgment in Wealden District Council v. Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority [2017] EWHC 351 (Admin) DATE: 21 Mar 2017.

³² DMRB Design Manual for Roads and Bridges (DMRB) Volume 11, Section 3, Part 1. Available at: <http://dmrb.net/ha/standards/dmrb/vol11/section3/ha20707.pdf> (Accessed 02/12/18).

³³ <https://www.freeths.co.uk/2017/04/25/environmental-bulletin-spring-2017/>

³⁴ Sweetman v. An Bord Pleanála, Case C-258/11, CJEU judgment 11 April 2013.

concerned, of a plan or project, it is not appropriate, at the screening stage, to take account of measures intended to avoid or reduce the harmful effects of the plan or project on that site.'

In the new judgement the CJEU concluded that mitigation measures could not be considered as part of the project, and thus that the screening stage of HRA should not take account of them. This will undoubtedly be tested further in the courts in coming months and years, but the key issue is whether the mitigation measures proposed can genuinely be considered as part of the project, in that they would happen in any case, irrespective of the Habitats site. If not, then they should be considered mitigation measures, and considered at the Appropriate Assessment stage of HRA.

This is an emerging issue for local authorities and means that, because of the potential for 'in-combination effects and the fact that HRA Screening should not take into account measures targeted at mitigating effects on Habitats Sites. Therefore, it is becoming increasingly commonplace for local authorities to conduct an Appropriate Assessment of all project, plans and planning applications (i.e. these are often no longer screened out, by way of an HRA Screening as has been the practise to date).

CJEU Ruling in the Netherlands nitrogen and agriculture cases c-293/17 and c-294/17

The final Court Judgement in relation to these two cases was handed down on the 7th November 2018. The judgement relates to the assessment of agricultural activities under the Habitats Regulations, but has potential implications for the assessment of changes in nitrogen (N) deposition in relation to air quality (as the air quality calculations draw upon N deposition rates from APIS³⁵ and guidance within the DMRB which assumes a 2% reduction in N deposition year on year).

Of particular relevance to the assessment of air quality effects on Habitats Sites, the Court of Justice of the European Union ruled that:

"An 'appropriate assessment' may only take into account the existence of Article 6(1) 'conservation measures', or Article 6(2) 'preventive measures', or specific measures adopted for a conservation programme, or 'autonomous' measures not in the programme, if the expected benefits of those measures **are certain** at the time of the assessment.

The Ruling makes clear that certainty and a thorough and in-depth examination of the scientific soundness is required that there is no reasonable scientific doubt as to the absence of adverse effects of each plan or project on the integrity of the site concerned.

³⁵ Air Pollution Information System (APIS). Available at: <http://www.apis.ac.uk/> [Accessed 02/12/18]



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