

Appropriate Assessment of Effects on a European Site

This is a record of the appropriate assessment of Wiltshire Council required by Regulation 61 of the Habitats Regulations 2017 (as amended). The project has been assessed as likely to have significant effects upon one or more European protected sites and is not directly connected to or required for the management of such sites. This assessment is made in accordance with the relevant guidance documents (ref. *HRA Handbook*, David Tyldesley Associates).

PART A: INFORMATION REVIEWED

Information about the plan or project

This Appropriate Assessment (AA) is for the Creation of a 3G Artificial Grass Pitch (AGP) with perimeter fencing, hardstanding areas, storage container, floodlights, an access footpath and associated bund at Land at Recreation Ground, Leafy Lane, Corsham, SN13 0JT (Application Number PL/2025/08886).

The application site is located within a core roost buffer for lesser horseshoe, greater horseshoe and Bechstein's associated with the Bath & Bradford-on-Avon Bat SAC. Box Mine SSSI, one of the SSSIs which underpins the SAC, is located immediately to the south of the site. Priority habitat deciduous woodland occurs north of the site. The proposals have potential to result in significant adverse impact on the special features of that site due to the lighting impacts on commuting and foraging routes used by bat species, and therefore has been screened into AA.

The application is supported by the following documents:

- Preliminary Ecological Appraisal (Extended) Report. 17 October 2025. BJ Collins Protected Species Surveyors Limited;
- Phase II Bat Surveys. 24 October 2025. BJ Collins Protected Species Surveyors Limited;
- Seasonal Overview – Phase II Bat surveys. 20 February 2026. BJ Collins Protected Species Surveyors Limited;
- Inspection for Roosting Bats at Leafy Lane Playing Fields, Corsham. 07 November 2025. BJ Collins Protected Species Surveyors. Ref. GLE_2513;
- Proposed Lighting Scheme. 13 June 2025. Surfacing Standards Limited. Project Code. G-231622;
- Spillage Comparison. 04 November 2025. Surfacing Standards Limited. Project No. G-231622. Drawing No. 07. Rev. 00;
- Floodlighting Scheme. 04 November 2025. Surfacing Standards Limited. Project No. G-231622. Drawing No. 06. Rev. 00;
- Sports Lighting Statement. 31 October 2025. Surfacing Standards Limited. Project Code. G-231622;

Bats were found to use the site for foraging and commuting, this included at least three Annex II species (barbastelle, greater horseshoe and lesser horseshoe). Low numbers of Myotis species were recorded during activity surveys so the presence of Bechstein's cannot be ruled out. Trapping surveys recorded fourteen bats, including individuals in breeding condition, indicating use of the surrounding site by commuting bats associated with SAC swarming sites. A Lesser horseshoe bat was captured adjacent to the existing artificial pitch shortly after floodlights were switched off. Walked transects identified activity concentrated along the northern

	woodland edge dominated by Common pipistrelle, with lower levels of light-sensitive species including Myotis bats and lesser horseshoe bats. Static automated monitoring confirmed activity is largely dominated by common pipistrelle and Noctule bat, with smaller numbers of light-sensitive species such as Myotis bats, Greater horseshoe bat, Brown long-eared bat and Barbastelle bat. The northern woodland boundary is identified as the key feature for bat activity, particularly for commuting and foraging by light-sensitive species, with lower levels of activity along the southern and eastern boundaries. In light of the judgement in Case C 323/17 CJEU “people over wind” the Council has determined that the application should be subject to an Appropriate Assessment under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended).
Designated Site	Bath and Bradford on Avon Bats Special Area of Conservation (SAC)
List of interest features	Qualifying Features: 1. Bechstein’s bat <i>Myotis bechsteinii</i> 2. Greater horseshoe bat <i>Rhinolophus ferrumequinum</i> 3. Lesser horseshoe bat <i>Rhinolophus hipposideros</i> The conservation objectives for the site are to: <i>“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;</i> • <i>The extent and distribution of the habitats of qualifying species;</i> • <i>The structure and function of the habitats of qualifying species;</i> • <i>The supporting processes on which the habitats of qualifying species rely</i> • <i>The populations of qualifying species; and</i> • <i>The distribution of qualifying species within the site.”</i> Publication Date: 27th November 2018 – version 3. This document updates and replaces an earlier version dated 30 June 2014 to reflect the consolidation of the Habitats Regulations in 2017.
Information about the designated site	Most SSSI units underpinning the SAC are either favourable or unfavourable recovering. SSSIs comprise disused stone mines which are of key importance as a hibernation and swarming site for three bat species (greater horseshoe, lesser horseshoe and Bechstein’s) because of the combination of temperature and humidity conditions, suitable access, lack of pollution and infilling, and lack of disturbance. The SAC is designated for the hibernating populations of three species of bat: lesser horseshoe, greater horseshoe and Bechstein’s bat, and as a whole, the SAC as a whole supports 15% of the UK population of greater horseshoe bats. While the SAC mines are designated for hibernating bats, both lesser and greater horseshoe bats are known to emerge from their hibernation sites during the winter months about once every two weeks for water / food, therefore condition of habitat, including quality of foraging in the immediate

	vicinity of SSSI sites is considered to be very important (Park, Jones & Ransome 2000)¹ for population numbers. Successful breeding, hibernation, swarming and dispersal are all critical in sustaining the bat populations for all component SSSI sites; these rely on an interconnected landscape for ease of movement, and linked sites for mixing of gene pools. Features of significance within the wider landscape are watercourses, woodland, grazed pasture, parkland, hay meadows, hedgerows, linear trees, scrub and individual feature trees Box Mines SSSI is designated for hibernating Barbastelle, Bechstein's, Greater Horseshoe and Lesser Horseshoe.
Other relevant plans or projects	• Wiltshire Core Strategy adopted January 2015 • Bat Special Areas of Conservation Planning Guidance for Wiltshire • Corsham Batscape Strategy 2016-2026
PART B: IMPACT PREDICTION ALONE	
Likely Significant Impact(s)	Predicted Effect of Impact(s)
Temporary /permanent loss of foraging and roosting habitat and flight corridors	There is potential for the eastern boundary of the site to be used as a foraging habitat and a commuting route for qualifying bat species of the SAC, thus constituting functionally linked habitat of the SAC. The lighting of linear features may cause disturbance to foraging and commuting bats, however there is a significant reduction in light soil compared to the existing condition therefore temporary/permanent loss of foraging habitat and flight corridors is therefore not predicted.
Risk of collision and bat fatality	N/A
Does retained core bat habitat connect to the wider habitat network?	Woodland to the north of the site and trees/hedgerows on the surrounding site boundaries will be retained and will continue to connect to the wider habitat network, therefore fragmentation of habitat corridors on the site is not predicted. The proposals are confined to the application boundary and impacts on the wider habitat network are therefore not predicted.
Disturbance to bat flight/foraging/roosting activity from light spill	In the absence of mitigation internal and external lighting has the potential to spill onto areas used by commuting and foraging bats, including on the SSSI/SAC outside of the site. In the absence of mitigation external lighting has the potential to spill onto areas where bats could be roosting which could impact the availability and suitability of roots for SAC bats.
Disturbance to bat flight/foraging/roosting activity from noise or human	The site is already in use as a sports pitch so bats in the area are therefore likely to be used to some disturbance from noise/human presence. Any temporary increase in disturbance associated with the construction phase of this development are considered de-minimis. The operational phase is anticipated to result in negligible increase in disturbance given the existing site conditions.

¹ PARK K.J., JONES G. & RANSOME R.D. 2000. *Torpor, arousal and activity of hibernating Greater Horseshoe Bats*

presence – construction and operational phases	
PART C: CONSERVATION OBJECTIVES	
Does the project or plan have the potential to:	
Cause delays in progress towards achieving the conservation objectives of the site?	No. While two of the SSSI units are unfavourable recovering this is based on assessing the suitability of the woodland management within the SAC boundaries for bats. The closest SSSI (Box Mines) is in favourable condition. No direct impacts to Box Mines SSSI/the SAC are anticipated, and the proposals are not expected to impact on the functionality of Box Mines SSSI/the SAC.
Interrupt progress towards achieving the conservation objectives of the site?	No, see above.
Disrupt those factors that help to maintain the favourable condition of the site?	No, see above.
Interfere with the balance, distribution and density of key species that are the indicators of favourable condition of the site?	Light spill onto vegetation has the potential to affect the distribution of commuting and foraging Lesser horseshoe bat, Greater horseshoe bat and Bechstein's bat in proximity to the application site. However, given the proposed reduction in light spill compared to the existing situation, together with the extent of woodland habitat and its connectivity to the wider landscape, the overall functionality of the landscape is unlikely to be adversely affected.
Cause changes to the vital defining aspects (e.g. nutrient balance) that determine how the site functions as a habitat or ecosystem?	No, see above.
Change the dynamics of the relationships that define the	No, see above.

structure and/or function of the site?	
Interfere with predicted or expected natural changes to the site?	No.
Reduce the area of key habitats?	No. There would be no reduction in the area of key habitats within the SAC, and no direct loss of habitat relied upon by qualifying species. While light spill onto vegetation has the potential to influence habitats used by commuting and foraging bats, the proposed reduction in light spill means the overall functionality of the landscape is unlikely to be adversely affected. Key habitats, particularly the northern woodland edge, would be retained and appropriately buffered.
Reduce the population of key species?	No.
Change the balance between key species?	No.
Reduce diversity of the site?	No.
Result in disturbance that could affect population size or density, or the balance between key species?	No.
Result in fragmentation?	No. The proposal would not result in fragmentation of key habitats or commuting routes. The principal corridor along the northern boundary would be retained and buffered with dark corridors maintained/enhanced. Existing commuting routes are expected to benefit from a reduction in light spill compared to the current situation.
Result in the loss or reduction of key features?	No, see above.
PART E: MITIGATION	
A lighting strategy has been submitted and will be secured via condition, should permission be granted. The lighting strategy demonstrates that lux levels on bat habitat outside of the site (including the SSSI) will not exceed 0.5 lux. Lighting within the application site has also been designed following relevant guidance for bats and lighting and is expected to result in a decrease in light levels compared to the current status of the site which could enhance areas within the site for bats. Where light levels within the site are expected to exceed 0.5 lux on boundary vegetation this is expected to be of negligible impact as impacts will be confined to the site itself which is currently subject to significant light disturbance.	

Conditions

The following conditions will be secured to any permission given:

1. Compliance with submitted documents

The development will be carried out in strict accordance with the following documents:

- Inspection for Roosting Bats at Leafy Lane Playing Fields, Corsham. 07 November 2025. BJ Collins Protected Species Surveyors. Ref. GLE_2513;
- Section 5 of the Preliminary Ecological Appraisal (Extended) Report. 17 October 2025. BJ Collins.
- Sections 7 and 8 and Appendices C, D and E of the Arboricultural Impact Assessment. 20 November 2025. RPS Group Plc. 5413-RPS-XX-XX-RP-AR-9104. Version. P01;
- Proposed Lighting Scheme. 13 June 2025. Surfacing Standards LTD. Project Code. G-231622;
- Sports Lighting Statement. 31 October 2025. Surfacing Standards Limited. SSL Project Code. G-231622;
- Floodlighting Scheme. 04 November 2025. Surfacing Standards Limited. Project No. G-231622. Drawing No. 06. Rev. 00;
- Spillage Comparison. 04 November 2025. Design and Access with Planning Statement. 31 October 2025. Surfacing Standards Limited. SSSI Project Code. G-231622.

REASON: For the avoidance of doubt and for the protection, mitigation and enhancement of biodiversity.

2. Lighting

Lighting will be installed in strict accordance with the submitted documents and maintained in accordance with the scheme for the lifetime of the development. No additional external light fixture or fitting will be installed within the application site unless details of existing and proposed new lighting have been submitted to and approved by the Local Planning Authority in writing. The submitted details will demonstrate how the proposed lighting will impact on bat habitat compared to the existing situation.

The plans will be in accordance with the appropriate Environmental Zone standards set out by the Institution of Lighting Professionals (ILP) Guidance Notes on the Avoidance of Obtrusive Light (GN 01/2021) and Guidance note GN08/23 "Bats and artificial lighting at night", issued by the Bat Conservation Trust and Institution of Lighting Professionals.

REASON: To avoid illumination of habitat used by bats.

Note to case officer: please also include a condition to secure adherence to the Sports Lighting Statement, specifically Page 3 which includes the use of time clocks, lighting curfews, and the use of dimmable control during training purposes.

Temporary / permanent loss of foraging habitat and flight corridors

	There is potential for the hedgerows to be used as a foraging habitat and a commuting route for qualifying bat species of the SAC. The proposed development would introduce a larger pitch but incorporates a redesigned floodlighting scheme intended to significantly reduce light spill, particularly
--	--

	along the southern boundary, and create areas of darker habitat. The northern woodland edge, would be retained with substantial buffers to the proposed development.
PART F: CONCLUSION	
Is the project likely to affect site integrity?	
a) Alone?	No
b) In combination with other plans or projects?	No, all planning applications are subject to ongoing work to ensure no loss of foraging or commuting habitats for bats using the SAC hibernation sites (and maternity), particularly by ensuring existing vegetation is left unlit as far as possible, maintaining existing vegetation along key potential flight lines and including additional planting to provide new commuting and foraging habitat for the future. Surveys and mitigation are carried out in accordance with the Council's Bat Special Areas of Conservation (SAC) Planning Guidance for Wiltshire, which is regularly updated in light of new information and available to download on the council website. This Guidance includes buffer areas around the hibernation sites designated as part of the SAC and other key roost sites, which forms a consultation zone, highlighting where the Council Ecologist should be consulted on planning applications. This consultation zone is also broken down into buffer areas by SAC species. Surveys within the consultation zone are expected to employ a higher level of survey effort and ecological consultants are reminded that they should agree the survey scope of potential development sites with the relevant council ecologist in advance.
Recommendation:	
The appropriate assessment concludes no adverse effects on site integrity so the application can be positively determined subject to suitable mitigation measures being secured by condition and implemented.	
Name of officer(s) making the assessment	Jessica Cracknell, Ecologist Ecology team, Natural & Historic Environment 20/03/2026
Date:	
Natural England Comments	
Name of Natural England officer	
Date:	