

Habitat Regulations Assessment

Survey site:

Blackberries Camping, Monkton Farleigh, Wiltshire, BA15 2QP

Client:

Stuart Anderson

Date:

21/04/2026

Project:

This report has been produced to support a planning application with Wiltshire Council. The proposal is described as: '*Erection of replacement clubhouse, replacement of reception building and erection of sauna after demolition of toilet/shower/pot wash building*'.

Executive Summary

- Following the HRA Stage 1: Screening outlined within, it is considered that risks from the proposed development (alone or in conjunction with other development) on the statutory designated site **cannot be dismissed**, as pathways exist which could lead to adverse effects on the integrity of the European site.
- **These are as follows;**
 - **Light pollution**
 - **Impacts to qualifying species**
- **Stage 2: Shadow Assessment - Mitigation methods are discussed:**
 - The shadow Appropriate Assessment concludes that, **subject to the implementation of a sensitive low-level lighting scheme designed** in accordance with Bats and Artificial Lighting at Night Guidance Note GN08/23 and the submitted lighting layout, **the proposal will not adversely affect the integrity of Bath and Bradford on Avon Bats SAC**, either alone or in combination with other plans or projects.
- Accordingly, an “Appropriate Assessment” **will be** required under Article 6(3) and 6(4) of the Habitats Directive before the Competent Authority (Wiltshire Council) decides to undertake, or give any consent, permission or other authorisation for this plan.

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Version control

Status	Issue	Name	Date
Final	1.0	Laurence Wills ACIEEM BSc (Hons), Senior Ecologist	21/04/2026

Proportionality

The work involved in preparing and implementing all ecological surveys, impact assessments and measures for avoidance, mitigation, compensation and enhancement should be proportionate to the predicted degree of risk to biodiversity and to the nature and scale of the proposed development. Consequently, the decision-maker should only request supporting information and conservation measures that are relevant, necessary and material to the application in question. Similarly, the decision-maker and their consultees should ensure that any comments and advice made over an application are also proportionate.

This approach is enshrined in Government planning guidance, for example, paragraph 185 of the National Planning Policy Framework for England.

The desk studies and field surveys undertaken to provide a Preliminary Ecological Appraisal (PEA) or the HRA screening process might in some cases be all that is necessary.

(BS 42020, 2013)

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1.0 Introduction and Context

1.1 Background

Arbtech Consulting Limited was instructed by Stuart Anderson to undertake a Habitat Regulations Assessment, to assess the likelihood and scope of likely significant impacts on Bath & Bradford on Avon Bats SAC (henceforth described as “the designated site”) within proximity of Blackberries Camping, Monkton Farleigh, Wiltshire, BA15 2QP (henceforth described as “the proposed site”) of activities related to development activities within the proposed development area and activities relating to its subsequent use.

Wiltshire Council may be required to undertake a Habitat Regulations Assessment (HRA) to assess the likelihood of adverse impacts of the proposed development on these designations in the form of an Appropriate Assessment (AA). This report represents an initial screening process that determines what if any likely significant effects may arise from the development and what further information is likely to be required to inform a full AA or other local mitigation strategies (such as financial contributions to access schemes).

1.2 Site Context

The site is located to the north of Monkton Farleigh, near Bradford on Avon, Wiltshire (national grid reference: ST 80133 66109). The site comprises a temporarily closed camping site supporting areas of modified grassland, bramble scrub, scattered trees, and woodland. A large block of woodland is located directly offsite to the northwest, with open grassland present to the south and southeast. A network of hedgerows and scattered mature trees connects the site to the wider landscape to the east. The site and surrounding environment are considered to provide high potential for supporting a range of wildlife.

1.3 HRA Informative

European Sites

European sites include Special Protection Areas (SPAs) and Special Areas of Conservation (SACs), also collectively referred to as Natura 2000 sites. Natura 2000 sites (throughout Europe) or the National Site Network (following Brexit). The European Union Habitats Directive on the conservation of natural habitats and of wild fauna and flora (Council Directive 92/43/EEC) and the Birds Directive on the conservation of wild birds (Council Directive 79/409/EEC) place obligations on the UK to take certain actions for nature conservation. The Habitats Directive aims to maintain biodiversity and details measures to maintain or restore natural habitats and species at favourable conservation status. The Birds Directive protects all wild birds and their habitats and details special measures for migratory species and those that are considered to be vulnerable and/or rare. The Conservation of Habitats and Species Regulations 2017 (as amended), commonly known as 'The Habitats Regulations', transpose the Habitats Directive into national law and sets out the provisions for the protection and management of species, and habitats of European importance, including European sites.

Habitat Regulations Assessment

An HRA is required for any proposed plan or project which may have an adverse effect on one or more European sites. The purpose of HRA is to determine whether or not there are any likely significant effects (LSEs) on the integrity of any European site and, where LSE are identified, to provide mitigation measures to avoid, reduce or off-set the effects. HRA only legally applies to European sites. However, the National Planning Policy Framework (NPPF) recommends that the same level of protection is given to proposed or listed Ramsar sites.

All European and Ramsar sites overlap to some degree with nationally designated Sites of Special Scientific Interest (SSSIs). The HRA process does not apply to the broader conservation interests of the SSSI designations. However, the latter are addressed separately in the supporting ecological assessments produced in relation to the proposals.

HRA can be divided into the following stages:

1. HRA Stage 1: Screening for likely significant effects – identifying whether a project is likely to have a significant effect on a European site.
2. HRA Stage 2: Appropriate Assessment (AA) – collection of information, and determination of the effect the Proposed Development is likely to have on the integrity and designated features of the European sites 'screened in' during Stage 1.

3. HRA Stage 3: Mitigation and alternative solutions – where adverse effects are identified in Stage 2, the project should either be altered, or alternative solutions and mitigation specified to fully cancel out the adverse effects.

Habitat Regulations Assessment Screening Assessment

This step is a simple assessment to check or screen if a proposal:

- is directly connected with or necessary for the conservation management of a European site.
- risks enacting a significant effect on a European site on its own or in combination with other proposals.

Integral design features or characteristics, such as layout, timing and location will be considered to inform the screening decision. These, when well considered by the developer may mean that any risk to a European site is avoided and they do not need to do an appropriate assessment. The assessment will also examine the risk and scale of any indirect issues such as net increases in residents (and associated increases in recreational impacts). **At screening stage, the report should not consider any mitigation measures included by the proposer for the purpose of avoiding or minimising risk to a National Network Site. Mitigation measures are considered at Shadow/Appropriate Assessment stage.**

Appropriate Assessment

Should likely significant effects be identified, it is the responsibility of the LPA to conduct an Appropriate Assessment (AA) to quantify the scale of any likely adverse effect upon the integrity of The National Network Site/s and to factor in any mitigation measures. Additional survey work may be required to inform this and the results of such work are integrated into this report to form an informative Shadow Assessment, which will be used by the Competent Authority in their own AA.

Local Planning Policy – Wiltshire Council

Core Policy 50 – Biodiversity and Geodiversity (adopted Wiltshire Core Strategy, 2015)

Wiltshire Council's current adopted strategic biodiversity policy is Core Policy 50: Biodiversity and Geodiversity in the Wiltshire Core Strategy. The Core Strategy identifies this as the operative biodiversity policy, and the emerging Local Plan expressly indicates that Core Policy 50 is intended to be updated and replaced by emerging Policies 88 and 89. The adopted policy seeks to ensure that development protects features of nature conservation and geological

value, avoids impacts on local biodiversity interests, maintains ecological connectivity, and secures biodiversity enhancement, with major development expected to deliver biodiversity gains as part of scheme design.

In accordance with Core Policy 50:

- development should protect features of biodiversity and geodiversity value and avoid harm where possible;
- site layout, buffering and ecological connectivity should be used to reduce impacts on habitats and species;
- development should seek opportunities to enhance biodiversity rather than merely minimise damage; and
- major development is expected to include measures that deliver biodiversity enhancement as part of the proposal.

Emerging Policy 88 – Biodiversity and Geodiversity (Wiltshire Local Plan Review)

The latest emerging Wiltshire Local Plan contains Policy 88: Biodiversity and Geodiversity. Search results from the council's Regulation 19 material show that this policy replaces Core Policy 50 and is the principal emerging policy for biodiversity protection. The policy is framed around protecting and enhancing biodiversity, applying the mitigation hierarchy, avoiding impacts on local sites and priority habitats, and incorporating biodiversity enhancement into development proposals. The consultation material also shows the policy requiring proposals to contribute to and enhance the natural and local environment and to include biodiversity measures within new development.

In practical terms, Policy 88 indicates that:

- biodiversity impacts should be addressed through the mitigation hierarchy;
- impacts on local sites, priority habitats and other ecological receptors should be avoided first, then mitigated, and only compensated where necessary;
- proposals should secure enhancement as part of the design response; and
- biodiversity should be considered not only as a constraint, but as a design and placemaking issue within the built environment.

Bath and Bradford on Avon Bats SAC

Wiltshire Council's biodiversity guidance confirms that the Bath and Bradford on Avon Bats SAC is a key international ecological receptor in the county. The council identifies the SAC as protecting internationally important bat interest, and its planning guidance explains that development subject to planning control may require survey, mitigation and compensation where it could affect SAC bat populations. The guidance also makes clear that, where likely significant effects cannot be ruled out, the local planning authority must undertake Habitats Regulations Assessment, and permission cannot lawfully be granted unless no adverse effect on site integrity can be ascertained.

For reporting purposes, the important Wiltshire point is that the latest Local Plan does not appear to rely on a standalone SAC policy equivalent to East Hampshire's CP22. Instead, effects on the Bath and Bradford on Avon Bats SAC are addressed through the wider biodiversity policy framework, supported by the plan HRA and specialist bat guidance. The 2024 and 2025 Wiltshire Local Plan HRA material states that Policy 88 provides reference to Wiltshire Bat SAC planning guidance, and the HRA identifies mitigation through Policy 88 together with the Wiltshire Bat SAC Planning Guidance, the Trowbridge Bat Mitigation Strategy and, in the Westbury context, Westbury Country Park.

Accordingly, the current Wiltshire position can be summarised as follows:

- development with potential to affect the Bath and Bradford on Avon Bats SAC must be considered through HRA where likely significant effects cannot be excluded;
- Wiltshire relies on Policy 88 as the main emerging policy hook for SAC-related ecological protection;
- the council's Bat SAC Planning Guidance is an important implementation document for applications affecting SAC bat habitat, flightlines, commuting routes, foraging habitat or roosts; and
- in some parts of the county, additional place-based mitigation mechanisms are expected, including the Trowbridge Bat Mitigation Strategy and the Westbury Country Park approach identified in the HRA and Statements of Common Ground.

2.0 Baseline Information

The following table describes qualifying features and site conservation objectives as cited by the JNCC.

European Site / Distance from application site	European Site Descriptions
Bath and Bradford-on-Avon Bats SAC 290m distance	Bath and Bradford-on-Avon Bats SAC is a designated Special Area of Conservation in England covering approximately 106.45 ha within the Gloucestershire, Wiltshire and Bristol/Bath area. The SAC is a composite bat site centred on a network of underground roost complexes and associated supporting habitat. JNCC identifies the site as important for greater horseshoe bat and Bechstein's bat as primary qualifying features, with lesser horseshoe bat also present as a qualifying feature. The SAC was selected because it includes hibernation sites associated with about 15% of the UK greater horseshoe bat population, while the wider site series is also considered one of the best areas in the UK for Bechstein's bat. Annex II species that are a primary reason for selection of this site - Greater horseshoe bat <i>Rhinolophus ferrumequinum</i> – JNCC states that the site “includes the hibernation sites associated with 15% of the UK greater horseshoe bat population” and is selected because of “the importance of this exceptionally large overwintering population.” - Bechstein's bat <i>Myotis bechsteinii</i> – JNCC records that small numbers have been found hibernating in abandoned mines in the area, and the Standard Data Form identifies the SAC as one of the best areas in the United Kingdom for this species. Annex II species present as a qualifying feature, but not a primary reason for selection - Lesser horseshoe bat <i>Rhinolophus hipposideros</i> – JNCC lists this species as a qualifying feature present within the SAC, and the Standard Data Form notes that the area supports a significant presence. Site character The SAC comprises extensive networks of caves, mines and man-made tunnels used by bats for hibernation, mating and as a staging post prior to dispersal. The formal citation states that it also includes areas of calcareous grassland, scrub and woodland used as feeding and commuting habitat. Natural England's Site Improvement Plan describes the SAC as consisting of four component sites — Brown's Folly, Box Mine, Winsley Mines, and Combe Down and Bathampton Down Mines — distributed south and east of Bath. These abandoned limestone mines are supported by a wider landscape of broadleaved woodland, species-rich calcareous grassland, watercourses, grazed pasture, hay meadows, hedgerows, linear trees and scrub, all of which are important for foraging and commuting through the bats' life cycle.

General site character

JNCC describes the site's general character as:

- Broad-leaved deciduous woodland
- Heath, scrub and related semi-natural vegetation
- Other land, including towns, villages, roads and former industrial/mineral land

The Standard Data Form also identifies the site as a lowland, hilly limestone landscape with caves, crags/ledges and valleys, reflecting the geological and mined character that underpins its roosting function.

Key ecological sensitivities and pressures

Natural England's Site Improvement Plan identifies a number of current and emerging pressures affecting the SAC and its qualifying bat species. These include:

- Planning and development pressures, including the difficulty of assessing cumulative effects across a wide area and across local authority boundaries.
- Change in land management, particularly in the wider landscape used for roosting, foraging and commuting habitat.
- Loss, fragmentation or poor management of off-site habitat, including uncertainty over critical commuting corridors and feeding areas in the wider landscape.
- Public access and disturbance, both from ongoing visitor pressure and from one-off damaging activities such as bonfires, aerosol spraying, and inappropriate use of mine entrances or underground spaces.
- Direct third-party impacts and vandalism, especially where access to mine systems or entrances is gained for inappropriate purposes.
- Change to site conditions due to mine instability, as collapse or altered entrance conditions may affect ventilation, temperature and humidity within the mines and may render entrances unusable for bats.
- Evidence gaps, especially in relation to Bechstein's bat and the use of the wider landscape by all three qualifying species, which can make impact assessment and mitigation design more difficult.

3.0 HRA Stage 1: Screening for Likely Significant Effects

3.1 Potential Impacts of the Proposed Development on European Sites

The following potential impacts on a European site from the proposed development are given consideration were considered relevant:

- Generation of particulate matter (pm30) during construction
- Watercourse/body and groundwater pollution
- Water quality
- Light pollution
- Developmental pressure
- Noise disturbance
- Loss of associated habitat
- Fragmentation of associated habitat
- Hydrological changes
- Impacts to qualifying species of the European site, either directly or indirectly where they are considered to be functionally linked to the site.
- Recreational disturbance (especially dog walking)
- Vehicular emissions
- Nutrient neutrality (in the case of EU sites functionally linked to local river catchments)
- Synergistic impacts in combination with other projects.

Any impact requires a pathway to exist (direct or indirect) between the proposal and European Site, or functionally linked habitat. The Environmental Risk Management model, decrees that an environmental risk is present when there exists an unbroken risk pathway chain between the source of risk and the ecological receptor (Site and qualifying features), as illustrated below.

Risk → Pathway → Receptor

Where any element of this pathway is missing or broken, there can be no risk.

3.2 Evaluation of the Potential for Likely Significant Effects (LSEs) on European Sites

The below table details an assessment of potential for likely effects on Stodmarsh SAC/SPA from the proposed development. A traffic lights system is employed, with green used to illustrate no LSE and amber used to illustrate a LSE:

Evaluation of likely Risk Pathways	
Particulate Matter (pm30)	
Pathway	The risk that generation of constructional or operational aerial outputs such as dust, may impact air quality and damage habitats associated with protected sites to a degree likely to impact the integrity of the site.
Evaluation of risk	The proposed development comprises the demolition and replacement of three buildings within their existing footprints on an established camping site. Although some dust and particulate matter may be generated during demolition and construction, such effects are typically highly localised and temporary in nature. Given the separation distance from Bath and Bradford on Avon Bats SAC, the limited scale of the works, and the fact that the SAC is designated for bat species rather than habitats sensitive to air quality deposition, no meaningful pathway of risk from particulate matter has been identified. This pathway is therefore screened out.
No likely significant effect	
Ground or Surface Water Pollution	
Pathway	The risk that the transfer of pollutants from the site to the protected sites could take place via hydraulic connectivity of groundwater resources, via overland flow of surface waters or via watercourses to any standing running or groundwater resources linked to the ecological functioning of any qualifying habitat or species within or functionally linked to the European site and impact it to a degree impacting long term integrity.

Evaluation of risk	Bath and Bradford on Avon Bats SAC is designated for bat species whose qualifying interests relate primarily to roosting, commuting and foraging habitat, rather than groundwater or surface water quality processes. In the absence of any direct hydraulic connection or clear mechanism by which pollutants from the site could affect the qualifying bat species or the ecological functioning of the SAC, no meaningful pathway of risk has been identified. This pathway is therefore screened out.
No likely significant effect	
Water quality	
Pathway	The risk that pollutants from the development, including sediment, chemicals, or wastewater, could be transferred to protected sites via wastewater treatment plants and associated plumbing.
Evaluation of risk	While the development will generate wastewater and involve standard plumbing connections, Bath and Bradford on Avon Bats SAC is designated for bat species whose conservation interests relate primarily to roosting, commuting and foraging habitat, rather than wastewater-dependent habitats or water quality processes. In the absence of any clear pathway by which pollutants arising from wastewater treatment or associated plumbing could affect the qualifying bat species or the ecological functioning of the SAC, no meaningful pathway of risk has been identified. This pathway is therefore screened out.
No likely significant effect	
Light Pollution	
Pathway	The risk that light spill into protected sites could impact upon light sensitive species population viability.
Evaluation of risk	The proposed development includes the installation of new external lighting associated with the replacement buildings and paths. Bath and Bradford on Avon Bats SAC is designated for bat species whose ecological integrity depends on the maintenance of suitable dark conditions along roosting, commuting and foraging routes.

	The introduction of additional lighting within a site that may be used by commuting or foraging bats gives rise to a potential pathway of risk. On this basis, likely significant effects from light pollution cannot be ruled out at the screening stage, and this pathway is therefore screened in for further consideration within the Appropriate Assessment.
Likely significant effect	
Developmental pressure	
Pathway	The risk that urban expansion and land use change associated with the development may contribute to habitat loss, fragmentation, or degradation of functionally linked land. This can result in a reduction of available space for qualifying species, increased edge effects, and ecological isolation, which may impact the long-term integrity of protected sites by restricting natural habitat dynamics and species movement.
Risk	The proposed development comprises the demolition and replacement of three existing buildings within their current footprints on an established camping site. As such, the proposals do not represent a material expansion of the existing developed area or a substantive change in the site's baseline land use. No significant additional land take, habitat degradation or fragmentation of the wider landscape is proposed through the redevelopment itself. On this basis, no meaningful pathway of risk from development pressure has been identified in relation to Bath and Bradford on Avon Bats SAC, and this pathway is therefore screened out.
No likely significant effect	
Noise Disturbance	
Pathway	The risk that noise generated during the development may disturb sensitive species present within protected sites.
Evaluation of risk	Although temporary noise may arise during demolition and construction, this would be localised and short term in nature. The completed development would not materially alter the baseline use of the site or significantly increase levels of activity.

	Given the nature of the proposals and the absence of any clear mechanism by which construction or operational noise would affect the qualifying bat species of Bath and Bradford on Avon Bats SAC at a level capable of affecting site integrity, no meaningful pathway of risk has been identified . This pathway is therefore screened out.
No likely significant effect	
Loss, Damage or Fragmentation of Qualifying or Functionally Linked Habitat	
Pathway	The risk that the development may lead to loss or fragmentation of qualifying habitats or functionally linked habitats associated with protected sites.
Evaluation of risk	On the basis of the information available, the proposals would not result in the loss, severance or fragmentation of habitat features likely to function as bat commuting or foraging habitat, and would not materially alter the existing site layout or baseline land use. As such, no qualifying habitat, or functionally linked habitat associated with Bath and Bradford on Avon Bats SAC, would be lost or fragmented by the redevelopment. Accordingly, no meaningful pathway of risk has been identified and this pathway is therefore screened out.
No likely significant effect	
Impacts to Qualifying Species	
Pathway	The risk that the development may lead to impacts upon qualifying species in a manner that threatens the integrity (ability to persist) of their populations within protected sites (in this context “integrity” refers to ability to persist). This may be assessed in isolation or in combination with other developments. It addresses populations both within the site and any external “stepping stone” or other functionally linked habitats. Individual impacts pertaining to any relevant protected species legislation are beyond the scope of this assessment and where relevant are addressed separately.

Evaluation of risk	Bath and Bradford on Avon Bats SAC is designated for bat species whose ecological integrity depends not only on roost sites but also on the surrounding landscape used for commuting and foraging. The proposed development involves the demolition and replacement of three buildings within an established camping site, together with the introduction of external lighting. Although the redevelopment would remain within the existing building footprints, the site may still be used by bats as part of the wider supporting habitat network. On this basis, a potential pathway of risk to qualifying species cannot be ruled out at the screening stage. This pathway is therefore screened in for further consideration within the Appropriate Assessment.
Likely significant effect	
Recreational disturbance	
Pathway	The risk in isolation, or in combination with other projects that the development may lead to adverse impacts upon habitats and species communities within the development via increased recreational pressure, including; Trampling, litter, vandalism, arson, disturbance of and destruction of wildlife by walkers, cyclists, motorbikes, cats and dogs and nutrient input via dog fouling. Dogs may also cause disturbance of fauna. An additional recreational pressure may include the collecting of flora and fauna, in particular fungi and wildflowers.
Evaluation of risk	The proposed development comprises the demolition and replacement of three buildings within their existing footprints on an established camping site and would not materially alter the recreational baseline of the site. Bath and Bradford on Avon Bats SAC is designated for bat species, whose qualifying interests relate primarily to roosting, commuting and foraging habitat rather than sensitivity to recreational pressure of the type typically associated with residential or visitor development. In the absence of any clear mechanism by which the proposals would increase trampling, disturbance, dog walking or other access-related pressures affecting the qualifying bat populations, no meaningful pathway of risk has been identified. This pathway is therefore screened out.
No likely significant effect	

Vehicular emissions	
Pathway	The risk that the development either by itself or in combination with other LPA wide planning applications and projects may lead to adverse impacts upon qualifying habitats and species via atmospheric pollution caused by vehicles travelling on roads in close proximity to protected sites, resulting in deposition of toxic and nutrient enriching compounds, e.g Nitrogenous compounds on sensitive habitats, leading to alterations in species communities via the loss of air pollution/nutrient enrichment sensitive community members. Vehicle emissions can result in between 20 and 65% of total N deposition on European Sites in the UK. Development proposals (regardless of their type, size and location within the district) resulting in increases of one or more additional vehicles may contribute to increases in deposition. In addition, if other LPA wide projects result in increased traffic, the combined impacts may be greater than the sum of their individual parts.
Evaluation of risk	For Bath and Bradford on Avon Bats SAC, the qualifying features are bat species, and the principal sensitivities are generally associated with roosts, commuting routes, foraging habitat and light disturbance, rather than atmospheric nitrogen deposition in the way that heathland or woodland SACs are often assessed. The proposal relates to the demolition and replacement of three buildings within the existing footprint of an established camping site, so there is no obvious basis for concluding that it would materially alter baseline traffic generation. In the absence of any evidence that the development would give rise to a meaningful increase in vehicle flows on road links in proximity to habitats functionally linked to the SAC, no clear pathway of risk from traffic-related atmospheric pollution has been identified. This pathway is therefore screened out.
No likely significant effect	

4.0 Consideration of Need to Progress to Stage 2: Appropriate Assessment

The development is not directly connected with or necessary for the conservation management of a European site.

Following the HRA Stage 1: Screening outlined within, it is considered that risks from the proposed development (alone or in conjunction with other development) to the designated site **cannot be dismissed**, as pathways exist which could lead to significant adverse effects on the integrity of the European site.

These are as follows;

- **Light pollution**
- **Impacts to qualifying species**

Accordingly, an “Appropriate Assessment” **will be** required under Article 6(3) and 6(4) of the Habitats Directive before the Competent Authority (Wiltshire Council) decides to undertake, or give any consent, permission or other authorisation for this plan.

5.0 Stage 2: Appropriate Assessment

The Stage 1 screening assessment presented in Section 3 of this report identifies potential impacts related to lighting and protected species. It is the responsibility of the Local Planning Authority (Wiltshire Council) to carry out an Appropriate Assessment. Accordingly, an assessment of the proposals, including consideration of mitigation measures, is provided below on behalf of the Local Planning Authority. **Subject to the implementation of the measures set out below, it is concluded that the development would not give rise to significant effects on the integrity of the protected site.**

5.1 Mitigation measures

Light pollution and impacts to qualifying species

The Stage 1 screening assessment identified potential pathways of effect in relation to light pollution and impacts to qualifying species for Bath and Bradford on Avon Bats SAC. These pathways are closely linked, as the SAC is designated for bat species whose ecological integrity depends on the maintenance of suitable dark conditions across roosting, commuting and foraging habitats. The proposed development includes the introduction of external lighting associated with the replacement buildings and therefore has the potential to affect bats using the site or surrounding habitat.

However, the lighting strategy has been designed to ensure that effects on qualifying bat species are avoided. Lighting will be installed only in limited numbers and at low level, with chosen fixtures not exceeding 21cm in height and designed to be directed downward to minimise light spill. In accordance with the submitted lighting installation design (Appendix 3) and associated lighting specifications (model: 'The Solar Centre Warm White Aldenham Solar Path Down Light') all external lighting will adhere to the principles set out in the Bats and Artificial Lighting at Night Guidance Note GN08/23 (BCT and ILP, 2023). These measures include (but not limited to):

- Ensuring that no light spill occurs onto nearby vegetation, including mature trees;
- The use of fittings with no ultraviolet (UV) component;
- The exclusive use of LED lighting; and a warm white light source of 2700 Kelvin or lower to minimise the blue light component.

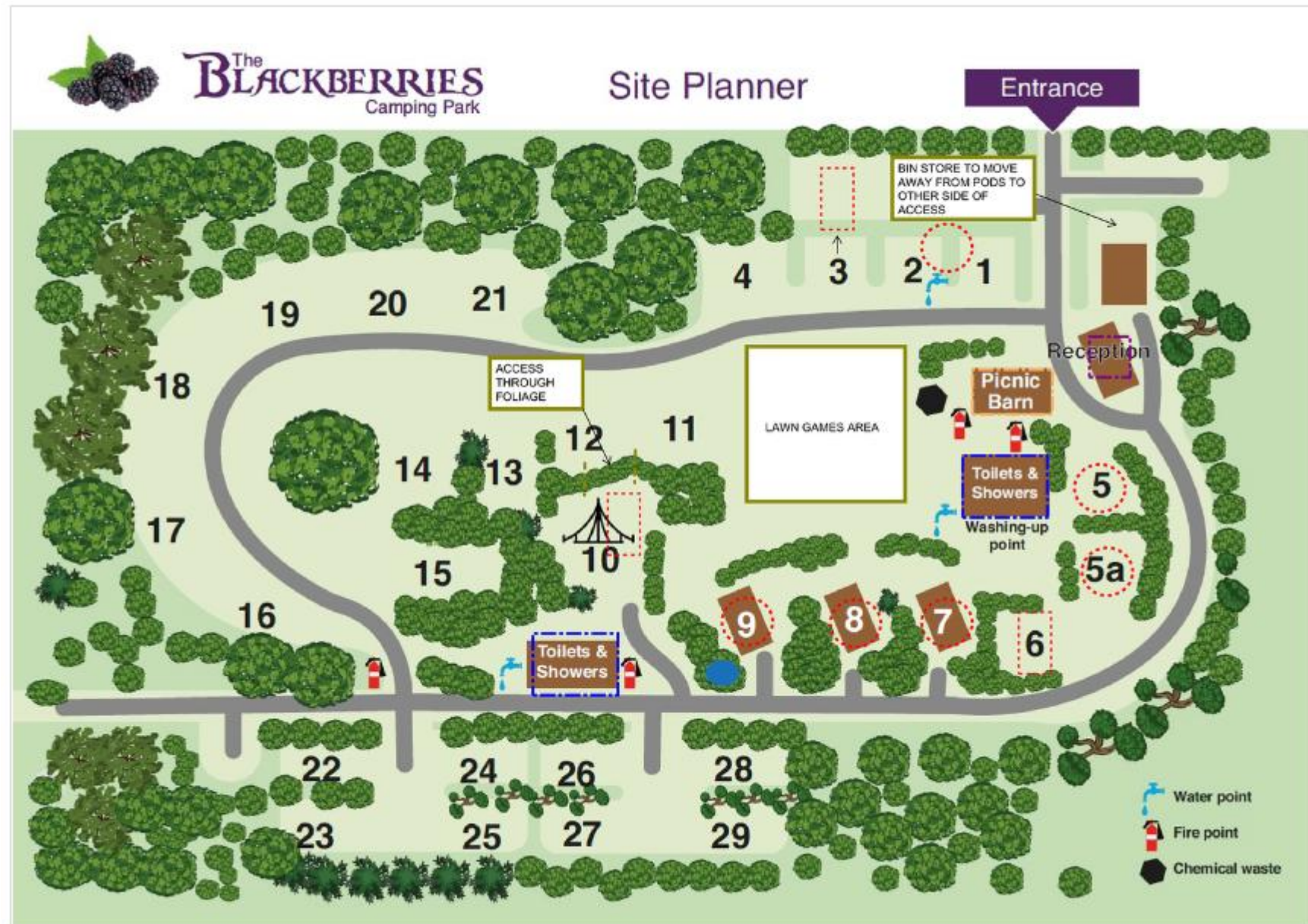
With these measures in place, and with lighting confined to the locations and specifications shown on the submitted design information, the proposal is not expected to alter the suitability of nearby habitat for commuting or foraging bats, nor disrupt the ecological functioning of the SAC. It can therefore be

concluded that the development, either alone or in combination with other plans or projects, would not adversely affect the integrity of Bath and Bradford on Avon Bats SAC.

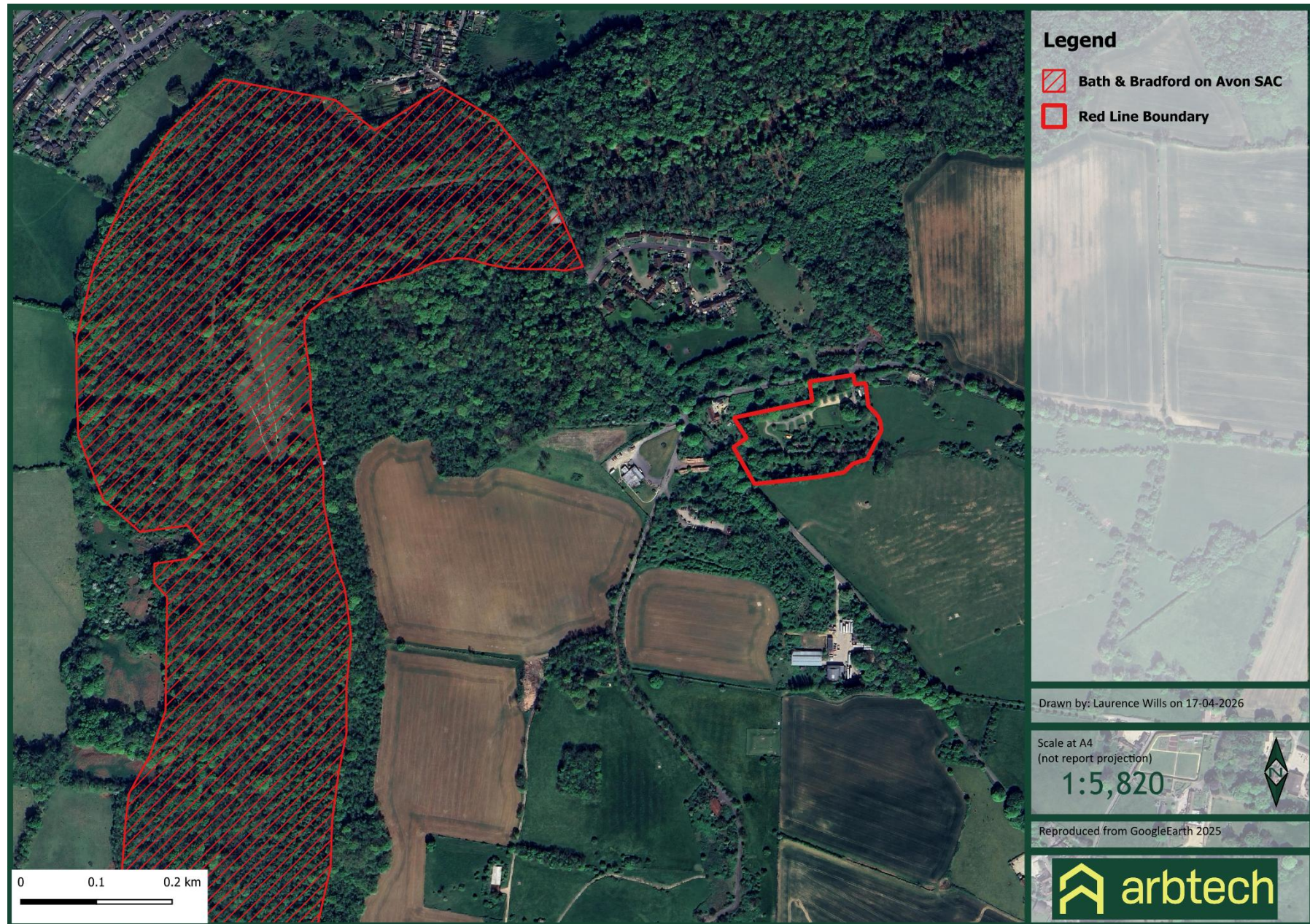
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Appendix 1: Proposed Development Plan



Appendix 2: Landscape View



Appendix 3: Lighting installation locations

Lighting Plan April 2026



Appendix 4: HRA Appropriate Assessment (AA) informative

The further stages of the HRA process are the domain of the Competent Authority. As such, Arbtech are unable to provide the following works, which are detailed below for informative purposes only.

The key stages of the Phase 2 HRA Appropriate Assessment (AA) will be:

- Complete additional scoping work including the collation of further information on sites as necessary to evaluate impact to take account of conservation objectives
- Agree scope and method of AA with Natural England (NE). The LPA will most likely be the body that shall conduct the Appropriate Assessment and it will require the applicants to provide the supporting information to undertake the assessment.
- Consider how proposals (“the plan”) ‘in combination’ with other plans and programmes will interact when implemented (this constitutes the “Appropriate Assessment”)
- Consider how effect on integrity of site could be avoided by changes to plan and the consideration of alternatives
- Develop mitigation measures (including timescale and mechanisms), if necessary
- Report outcomes of AA including mitigation measures, consult with Competent Bodies and wider [public] stakeholders as necessary. If it is determined that the project will not significantly affect European site it can proceed without further reference to Habitats Regulations. If there is residual doubt remaining after phase 2, the plan moves to Phase 3 and it will be necessary to:
 - Consider alternative solutions, delete from plan or modify
 - Consider if priority species/ habitats affected through further detailed evaluation
 - Identify ‘imperative reasons of overriding public interest’ (IROPI) economic, social, environmental, human health, public safety
 - Notify Government ▪ Develop and secure compensatory measures

The HRA process is often linked to the planning process and will often tend to run broadly in parallel with it.