

# 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 Conservation of Habitats and Species 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.

| PART A: INFORMATION REVIEWED            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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| Information about the plan or project   | <p><b>Planning application: PL/2026/02955; Conkwell Grange, Conkwell, Limpley Stoke, Bath, BA2 7FD</b></p> <p>This Appropriate Assessment is for the construction of an agricultural building.</p> <p>The site (~0.71 ha) comprises a grassland field with a building to the west, woodland to the south and further grassland to the north and east.</p> <p>The application site is within a consultation zone for bats associated with the Bath &amp; Bradford on Avon Bats Special Area of Conservation (SAC). Namely, the site falls within multiple Bechstein, Greater Horseshoe and Lesser Horseshoe core roost buffers associated with Combe Down, Winsley, Gripwood, Stoke Hill and Iford Manor. The proposals have potential to result in significant adverse impact on the special features of that site due to the loss of sensitive features (potential foraging and commuting habitat) and therefore has been screened into AA.</p> <p>The application is supported by the following ecology related documents:</p> <ul style="list-style-type: none"> <li>• <i>Preliminary Ecological Appraisal and Preliminary Roost Appraisal, Wildwood Ecology, 2026</i></li> <li>• <i>Statutory Biodiversity Metric, Jessica Boddy, April 2026</i></li> <li>• <i>Pre-development habitat plan, Wildwood Ecology, April 2026</i></li> <li>• <i>Post-development habitat plan, Wildwood Ecology, April 2026</i></li> </ul> <p>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).</p> |
| European site(s)                        | Bath and Bradford on Avon Bats Special Area of Conservation (SAC)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| List of European Site interest features | <p>Qualifying Features:</p> <ol style="list-style-type: none"> <li>1. Bechstein's bat <i>Myotis bechsteinii</i></li> <li>2. Greater horseshoe bat <i>Rhinolophus ferrumequinum</i></li> <li>3. Lesser horseshoe bat <i>Rhinolophus hipposideros</i></li> </ol> <p>The conservation objectives for the site are to:</p> <p><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></p> <ul style="list-style-type: none"> <li>• <i>The extent and distribution of the habitats of qualifying species;</i></li> <li>• <i>The structure and function of the habitats of qualifying species;</i></li> <li>• <i>The supporting processes on which the habitats of qualifying species rely</i></li> <li>• <i>The populations of qualifying species; and</i></li> <li>• <i>The distribution of qualifying species within the site.”</i></li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

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|                                                | <p>Publication Date: 27<sup>th</sup> November 2018 – version 3. This document updates and replaces an earlier version dated 30 June 2014 to reflect the consolidation of the Habitats Regulations 2017.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <p><b>Information about the site</b></p>       | <p>Most SSSI units underpinning the SAC were either favourable or unfavourable recovering during the last condition assessment.</p> <p>The internationally important designation of Bath and Bradford-on-Avon Bats SAC is comprised of a network of significant underground sites in both the Wiltshire and BNES administrative areas, including four nationally important Sites of Special Scientific Interest (SSSIs), namely Box Mine, Winsley Mines, Combe Down and Bathampton Down Mines, and Brown's Folly. These component sites are used by bats for hibernation, breeding, mating and as a staging post prior to dispersal.</p> <p>Also of importance are habitats with opportunities for foraging and flight corridors connecting the mines with foraging and roosting opportunities elsewhere. The persistence of bat populations at the SAC relies upon good connectivity to significant roosts in the wider landscape (i.e., maternity/transitory roosts).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <p><b>Other relevant plans or projects</b></p> | <p>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 associated roosts, 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 where necessary.</p> <p>Surveys and mitigation are carried out in accordance with the Council's HRA Guidance, which is regularly updated in light of new information and available to download on the council website. The Council's HRA 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.</p> <p>Other plans and applications that have been considered:</p> <ul style="list-style-type: none"> <li>• <u>Wiltshire Core Strategy</u></li> <li>• <u>18/07078/FUL</u> <ul style="list-style-type: none"> <li>○ This is an approved development of three housing units that does not appear to have been implemented. The existing and proposed houses are directly west of the current application site. The redline boundary for this previous development included the current site and labelled it as "<i>land to remain as existing</i>", though a hedgerow was proposed around the south and west of the field. This hedgerow has not been planted (as per aerial imagery) but did not form part of any ecology mitigation approved under 18/07078/FUL. Therefore, for the purpose of this AA, it is assumed that this hedgerow will <u>not</u> be delivered and it is not considered here as existing habitat nor proposed habitat.</li> <li>○ The bat survey report submitted with 18/07078/FUL (Engain, July 2018) identified a potential Lesser Horseshoe feeding perch on 'Building 1', which is 60m west of the current application site. A possible Bechstein's bat was also recorded foraging at the edge of Conkwell Wood County Wildlife Site,</li> </ul> </li> </ul> |

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|                                                                                                                | <p>85m west of the current application site.</p> <ul style="list-style-type: none"> <li>Other nearby applications: <ul style="list-style-type: none"> <li><u>PL/2021/05378</u> (conversion of squash court to pool)</li> <li><u>PL/2024/06191</u> (conversion of squash court to games room plus pool)</li> <li><u>18/04275/FUL</u> (demolition and replacement of stables, offices, etc.)</li> <li><u>17/09380/FUL</u> (campsite)</li> </ul> </li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>PART B: IMPACT PREDICTION</b>                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Likely Significant Impact(s)</b>                                                                            | <b>Predicted Effect of Impact(s)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Temporary / permanent loss of roosting habitat, foraging habitat and flight corridors                          | <p><b><i>Foraging habitat</i></b><br/>The BNG metric identifies that there will be a loss of ~0.16 ha of modified grassland.</p> <p>In the absence of any bat activity surveys, it is considered that the grassland is likely to be of some value to species such as Greater Horseshoe bats.</p> <p><b><i>Roosting habitat</i></b><br/>The proposed building will be connected to an existing off-site building to the west. During emergence surveys undertaken for 18/07078/FUL (see the 'other relevant projects' section above), two possible pipistrelle emergences were observed.</p> <p>The ecological appraisal submitted presently (Wildwood Ecology, 2026) states that this adjacent building now has no obvious potential roosting opportunities; the internal space is exposed and there are limited access points. It is now assessed as having negligible roosting potential.</p> <p>The proposed connected building will sit below the existing roofline of the adjacent building, and the existing roof structure will be retained.</p> <p>On the balance of evidence, it is considered unlikely that the existing building hosts roosting Annex II species, but a precautionary approach should be taken.</p> |
| Risk of collision and bat fatality                                                                             | No risk considered likely.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Disturbance to bat flight/foraging activity from light spill                                                   | Artificial lighting introduced during and post-development may cause disturbance to bat flight paths and foraging activity due to light spill.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Disturbance to bat flight/foraging activity from noise or human presence – construction and operational phases | During both the construction and operational phases of the development, there is potential for disturbance to bat flight and foraging activity due to increased noise levels and human presence. These impacts are considered minimal in nature as the site is unlikely to be disturbed during nocturnal hours (it is not residential).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>PART C: CONSERVATION OBJECTIVES</b>                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Does the project or plan have the potential to:</b>                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

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| Cause delays in progress towards achieving the conservation objectives of the site?                                                  | Unlikely                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Interrupt progress towards achieving the conservation objectives of the site?                                                        | Unlikely                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Disrupt those factors that help to maintain the favourable condition of the site?                                                    | <p>There will be a small loss of grassland which could be used by Annex II species.</p> <p>The effects of increased lighting during construction/operation, as well as people and noise (machinery/vehicles) disturbance during construction in the bat consultation zone could lead to adverse effects on habitats that the bats rely on for roosting, foraging and commuting, all of which lie outside the SAC boundary, but which are functionally linked to it.</p> |
| Interfere with the balance, distribution and density of key species that are the indicators of favourable condition of the site?     | As above. Development could interfere with habitats lying outside the SAC that are functionally linked to it.                                                                                                                                                                                                                                                                                                                                                           |
| Cause changes to the vital defining aspects (e.g. nutrient balance) that determine how the site functions as a habitat or ecosystem? | Unlikely                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Change the dynamics of the relationships that define the structure and/or function of the site?                                      | This could be disrupted if habitat between roosts and other sensitive features becomes less favourable for bats (e.g., through light disturbance).                                                                                                                                                                                                                                                                                                                      |
| Interfere with predicted or expected natural changes to the site?                                                                    | Unlikely                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Reduce the area of key habitats?                                                                                                     | <p>There will be a small loss of grassland which could be used by Annex II species.</p> <p>The effects of increased lighting during construction/operation, as well as people and noise (machinery/vehicles) disturbance during construction in the bat consultation zone could lead to adverse effects on habitats that the bats rely on for roosting, foraging and commuting, all of which lie outside the SAC boundary, but which are functionally linked to it.</p> |

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| Reduce the population of key species?                                                                   | Unlikely                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Change the balance between key species?                                                                 | Unlikely                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Reduce diversity of the site?                                                                           | Unlikely                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Result in disturbance that could affect population size or density, or the balance between key species? | <p>Unlikely</p> <p>There will be a small loss of grassland which could be used by Annex II species.</p> <p>The effects of increased lighting during construction/operation, as well as people and noise (machinery/vehicles) disturbance during construction in the bat consultation zone could lead to adverse effects on habitats that the bats rely on for roosting, foraging and commuting, all of which lie outside the SAC boundary, but which are functionally linked to it.</p> <p>However, given the scale of the application, population-level impacts are not anticipated.</p> |
| Result in fragmentation?                                                                                | <p>There will be a small loss of grassland which could be used by Annex II species.</p> <p>Given the proposed location of the building and surrounding connecting habitats, this level of habitat loss is not anticipated to significantly fragment any commuting corridors.</p>                                                                                                                                                                                                                                                                                                          |
| Result in the loss or reduction of key features?                                                        | There will be a small loss of grassland which could be used by Annex II species. There will be no loss of roosting habitat.                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>PART D: MITIGATION</b>                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Mitigation proposed</b>                                                                              | <b>How will these measures avoid or reduce impacts upon site integrity?</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Loss of potential foraging habitat</b>                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| BNG/habitat gains                                                                                       | <p>The BNG metric demonstrates a net gain in biodiversity units via the provision of trees and native-species hedgerow, as well as enhancement of grassland (to "other neutral grassland"). Overall, 57 new trees are proposed, including 12 along the driveway/access, and 45 grouped along the southern border of the site, covering approximately 0.23 ha.</p> <p>The potential impacts of the loss of ~0.16 ha of modified grassland are therefore considered manageable, provided the relevant BNG documents are secured via condition.</p>                                          |
| <b>Disturbance to bat flight/foraging activity from light spill</b>                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Lighting Plan condition                                                                                 | No plans for lighting have been provided, but the Planning Statement notes "there will be no external lighting". A condition must be set to ensure that should any lighting be proposed moving forwards, a suitable bat-sensitive scheme must be submitted to the council for approval.                                                                                                                                                                                                                                                                                                   |
| <b>Disturbance to bat flight/foraging activity from noise or human presence</b>                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| CMS condition                                                                                           | A Construction Management Statement, detailing precautionary                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

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|                                                                                                                                                                                                                      | measures to minimise the risk posed during construction, should be secured via condition. This aligns with that proposed in the Preliminary Ecological Appraisal report. |
| <b>PART E: CONCLUSION</b>                                                                                                                                                                                            |                                                                                                                                                                          |
| <b>Is the project likely to affect site integrity?</b>                                                                                                                                                               |                                                                                                                                                                          |
| <b>a) Alone?</b>                                                                                                                                                                                                     | No. Mitigation will ensure no loss of habitat functionality.                                                                                                             |
| <b>b) In combination with other plans or projects?</b>                                                                                                                                                               | No                                                                                                                                                                       |
| <b>Recommendation:</b>                                                                                                                                                                                               |                                                                                                                                                                          |
| The appropriate assessment concludes no adverse effects on the SAC site. The application can therefore be positively determined, subject to suitable mitigation measures being secured by condition and implemented. |                                                                                                                                                                          |
| <b>Name of officer(s) making the assessment</b>                                                                                                                                                                      | Abi Gazzard (Ecologist)<br>Natural & Historic Environment<br>Wiltshire Council                                                                                           |
| <b>Date:</b>                                                                                                                                                                                                         | 14/07/2026                                                                                                                                                               |
| <b>Natural England Comments</b>                                                                                                                                                                                      |                                                                                                                                                                          |
| <b>Name of Natural England officer</b>                                                                                                                                                                               |                                                                                                                                                                          |
| <b>Date:</b>                                                                                                                                                                                                         |                                                                                                                                                                          |
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