

Shadow Habitat Regulations Assessment

Hawk Ridge Business Park

July 2026

Ecology | Green Space | Community | GIS

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Shadow Habitat Regulations Assessment (sHRA)

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

Habitat Regulations Assessment (HRA) Process:

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

63 (1) A Competent Authority before deciding to undertake or give any consent, permission or other authorisation for a plan or project which –
a) Is likely to have a significant effect on a European Site or a European offshore marine site (either alone or in combination with other plans or projects), and
b) is not directly connected with or necessary to the management of that site,
Must make an appropriate assessment of the implications for that site in view of that site's conservation objectives

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

Assessment pursuant to the Habitats Regulations therefore involves:

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

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

Planning Application Reference:	Hawke Ridge Business Park, Westbury.
Site Address:	Hawke Ridge Business Park, Westbury BA13 4LD (central grid reference ST 86358 53286)
Proposal:	<i>Erection of: (i) 1 No. retail convenience store (Class E), 3 No. flexible retail units (Class E), and roadside drive through unit (sui generis); (ii) a 64-bed care home (Class C2); and (iii) 249 No. residential dwellings (Class C3) with associated access, green and blue infrastructure works.</i>
PLAN/PROJECT INFORMATION: The site is an area of 14.58ha in size, comprising two large arable fields, with scrub habitats, grassland, one non-priority pond, one non-priority watercourse, hedgerows and ruderal vegetation and developed land, sealed surface (see figure 1).	



Figure 1 Site location

The proposals will deliver a convenience store, three flexible retail units, a roadside drive through unit, a 64-bed care home and 249 residential dwellings with associated access, green and blue infrastructure works. The Proposed Development is a residential-led scheme that also delivers extensive green and blue infrastructure, including a Suitable Alternative Natural Greenspace (SANG), new woodland, hedgerow and grassland planting, and a Sustainable Drainage System (SuDS).

The proposed development at the site falls within the consultation zone for The Bath and Bradford on Avon Bats Special Area of Conservation (SAC), and the Salisbury Plains Special Protection Area (SPA).

INFORMATION ON EUROPEAN SITES WHICH COULD BE AFFECTED:

Bath and Bradford on Avon Bats SAC

Conservation Objectives¹:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:

- The extent and distribution of qualifying natural habitats and habitats of qualifying species;
- The structure and function (including typical species) of qualifying natural habitats;
- The structure and function of the habitats of qualifying species;

¹ Publication date: 27th November 2018, V3.

- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely;
- The populations of qualifying species;
- The distribution of qualifying species within the site.

Key issues currently impacting or threatening the condition of the SAC features² - relevant issues to this application are highlighted in bold for consideration in the screening:

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

Planning Permissions

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

Direct Impacts from third party

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

Public access/disturbance

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

² Site Improvement Plan Bath & Bradford on Avon Bats, UK0012584. Improvement Programme for England's Natura 2000 Sites (IPENS) Planning for the Future, v1.0. 01/04/2015.

Is the application directly connected with, or necessary to the management of the SAC for Nature Conservation? <i>Proposals that are clearly necessary for, or of value to, or inevitable as part of, management of the site for its qualifying interests can be scoped out of further assessment.</i>	No.						
Sailsbury Plain SAC Largest known expanse of unimproved chalk downland in north-west Europe containing 41% of Britain's remaining area of this habitat. Annex I habitats include; <i>Juniperis communis</i> formations on heaths or calcareous grasslands and <i>Semi-natural dry grasslands and scrubland facies on calcareous substrates</i> (<i>Festuco-Brometalia</i> (*important orchid sites). Annex II Species include Marsh Fritillary Butterfly (<i>Euphydryas</i> (<i>Eurodryas</i>, <i>Hypodryas</i>) <i>aurinia</i>). The SPA is designated due to the presence of significant breeding populations of stone curlew (<i>Burhinus oedicnemus</i>), quail (<i>Coturnix coturnix</i>) and hobby (<i>Falco subbuteo</i>) as well as wintering populations of hen harrier (<i>Circus cyaneus</i>). Conservation Objectives Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring; • The extent and distribution of the habitats of the qualifying features; • The structure and function of the habitats of the qualifying features ; • The supporting processes on which the habitats of the qualifying features rely ; • The population of each of the qualifying features; and • The distribution of the qualifying features within the site. Qualifying Features: A082 <i>Circus cyaneus</i>; Hen harrier (Non-breeding) A099 <i>Falco subbuteo</i>; Eurasian hobby (Breeding) A113 <i>Coturnix coturnix</i>; Common quail (Breeding) A133 <i>Burhinus oedicnemus</i>; Stone-curlew (Breeding) Key environmental conditions to support sites integrity: <table border="1"> <thead> <tr> <th>Qualifying features</th><th>Key Environmental Conditions</th></tr> </thead> <tbody> <tr> <td>A082 Hen harrier A099 Eurasian hobby A113 Common quail A133 Stone-curlew</td><td> • Appropriate levels of grazing management for calcareous grassland as foraging habitat for birds – grassland and dung invertebrates. • Woodland management. • Maintenance and connectivity of habitats used as foraging and roosting areas. </td></tr> <tr> <td>S1303 Lesser horseshoe bat, S1304 Greater horseshoe bat, S1323 Bechstein's bat</td><td> • Undisturbed roosts. • Appropriate levels of grazing management for calcareous grassland as foraging habitat for bats – grassland and dung invertebrates. • Woodland management. • Maintenance and connectivity of habitats used as flight lines. </td></tr> </tbody> </table>		Qualifying features	Key Environmental Conditions	A082 Hen harrier A099 Eurasian hobby A113 Common quail A133 Stone-curlew	• Appropriate levels of grazing management for calcareous grassland as foraging habitat for birds – grassland and dung invertebrates. • Woodland management. • Maintenance and connectivity of habitats used as foraging and roosting areas.	S1303 Lesser horseshoe bat, S1304 Greater horseshoe bat, S1323 Bechstein's bat	• Undisturbed roosts. • Appropriate levels of grazing management for calcareous grassland as foraging habitat for bats – grassland and dung invertebrates. • Woodland management. • Maintenance and connectivity of habitats used as flight lines.
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1. SCREENING

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

Salisbury Plain SPA

The site is screened out of a likely significant effect 'alone' on the Salisbury Plain SPA from this sHRA, as planned projections for housing delivery has been reviewed and reassessed in 2024 by Wiltshire Council³ with the conclusion of no likely significant effects on the Salisbury Plain SPA through increasing recreational pressure, provided the Mitigation Strategy for Stone Curlew is continued to be implemented.

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

The Application Site is allocated in the adopted Wiltshire Core Strategy (2015) under the Westbury Community Area strategy (Core Policy 32), as the strategic allocation "Land at Mill Lane, Hawkeridge, Westbury". The allocation of the site, and the Core Strategy as a whole, was subject to Habitats Regulations Assessment at the plan-making stage, which considered the effects of the planned growth on relevant European sites including the Bath and Bradford-on-Avon Bats SAC.

This project-level shadow HRA is prepared in that context and "tiers" from the strategic assessment: the principle of developing the Application Site has been established and assessed at plan level. However, consistent with Regulation 63 and the judgment in People Over Wind, the competent authority must still consider the likely significant effects of the specific project. This sHRA therefore addresses, at the project level and in the detail now required, the pathways relevant to the Proposed Development - in particular the lighting/commuting pathway affecting the bat SAC and the recreational disturbance pathway affecting the Salisbury Plain SPA. It is noted that the Proposed Development is residential led, whereas the site was allocated for employment use; the recreational pathway is therefore assessed afresh at the project stage.

The Bath and Bradford on Avon Bats SAC

Species Surveys: (refer to *Chapter 1 of the Environmental Statement and Appendix 11.4, Ethos 2026*, for full details). Note that these are preliminary at the time of writing, as the final monitoring period of bat static data is yet to be completed. These will be added in an addendum as part of the wider planning application when available.

Summary of bat static monitoring results:

Lesser horseshoe bat

Lesser horseshoe comprised 0.15% of all bat calls with a total of 55 calls throughout the survey period.

Lesser horseshoe calls were recorded at all locations apart from Location 7, however this was only utilised as part of the spring and summer 2026 surveys and not deployed as part of the summer and autumn 2025 surveys, as this location was added on as part of a Discretionary Advice Service (DAS) meeting with Natural England. Generally, activity was low; with Location 1 and 2 accounting for over 70% of total calls.

³ HRA and Mitigation Strategy for Sailsbury Plain SPA, reviewed in June 2024. Wiltshire Council.

No calls were recorded at Location 7 and the fewest calls recorded at Location 4 (1 call) and Location 3 (2).

Greater horseshoe bat

Greater horseshoe comprised 0.18% of all bat calls with a total of 66 calls throughout the survey period.

Greater horseshoe calls were also recorded at all locations, apart from Location 7. They were mostly recorded at locations 2 and 6, along the eastern site boundary woodland corridors; with a call count of 21 and 27 respectively. Location 2 accounted for over 31% of greater horseshoe calls and location 6 accounted for over 40% of calls.

No calls were recorded at Location 7 and the fewest calls were recorded at Location 3 (3 calls), Location 4 (4 calls) and Location 5 (5 calls).

There were no significant peaks in calls related to any month for either horseshoe bat, however calls were higher in August generally.

Bechstein bat – *Myotis spp*

There were three potential Bechstein's calls on the bat static monitoring surveys, however as *Myotis* are extremely difficult to determine to species via spectrogram, they have been merged into *Myotis spp* records for clarity. The combined *Myotis spp* data has been added for information, however it is noted that this will include all other possible *Myotis spp* bats recorded.

All *Myotis spp* bat calls comprised over 3% of the data with over 1,400 calls recorded thus far. Calls were significantly higher at Locations 1, 2 and 5, with the highest volume of calls recorded at Location 6, all of which are associated within the woodland corridor habitats around the north, east and south of the site.

There were no significant, distinct peaks in calls related to any month for either *Myotis spp*, however calls were higher in August, September, October and May, generally.

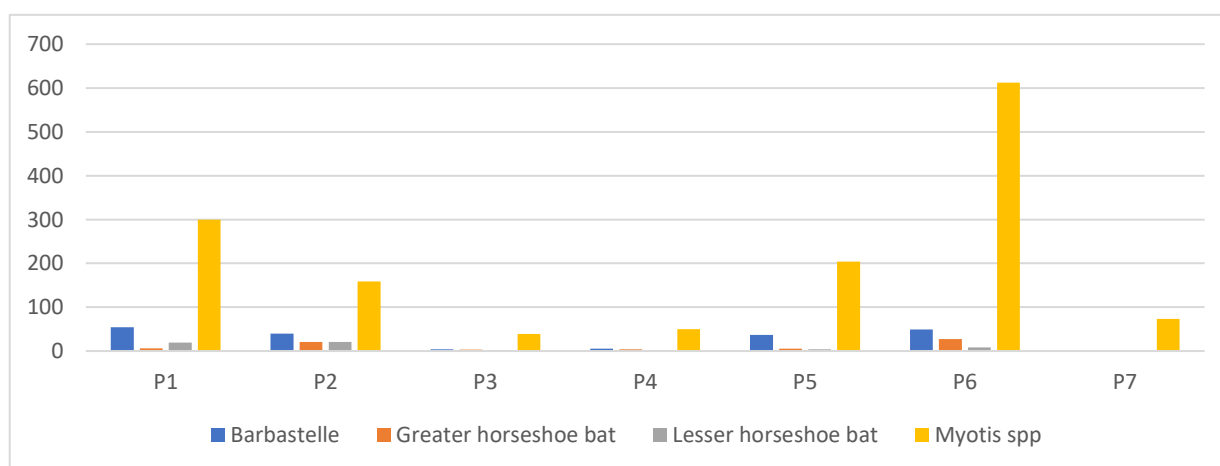


Figure 2 Calls by Annex II and *Myotis spp* species and location



Figure 3 Static locations 2025 and 2026 (2026 addition of Location 7)



Figure 4 Night-time bat walkover survey transect route

Total number of Annex II Species call registrations per location for the survey season (July – October 2025 and April – June 2026)

Species	P1	P2	P3	P4	P5	P6	P7
Barbastelle	54	40	4	5	37	49	0
Greater horseshoe bat	6	21	3	4	5	27	0
Lesser horseshoe bat	19	21	2	1	4	8	0
Myotis spp	300	159	39	50	204	612	73

Horseshoe bat activity is predominantly associated with the east boundary woodland corridor associated with the adjacent railway, with some bats recorded at Location 1, along the northern boundary pre-planting habitat that connects to the eastern site boundary.

Very few calls of either horseshoe species were registered on any statics.

A range of *Myotis spp* calls were recorded across the survey season, notable along the woodland boundary areas.

No records of any bats associated with the Bath and Bradford on Avon Bat SAC were recorded during the night-time bat walkover surveys.

Assessment of effects – Salisbury Plains SPA

In accordance with the judgment in *People Over Wind and Sweetman v Coillte Teoranta* (Case C-323/17), the likely significant effects of the Proposed Development on the Salisbury Plain SPA are assessed at this stage without regard to any mitigation measures. Mitigation embedded within the Proposed Development is considered at the Appropriate Assessment stage that follows.

The Application Site lies within the 6.4km recreational disturbance zone of the Salisbury Plain SPA. The Proposed Development is residential-led (249 No. dwellings and a 64-bed care home) and would generate an increase in the local population, with associated potential for increased recreational activity (such as walking and dog-walking) within the SPA, which has the potential to disturb the qualifying bird features.

It is noted that the Application Site is allocated for employment use under the adopted Wiltshire Core Strategy (2015) (Core Policy 32, Westbury Community Area; "Land at Mill Lane, Hawkeridge, Westbury"). The residential-led nature of the Proposed Development introduces a recreational disturbance pathway that would not arise from the allocated employment use, and which was therefore not assessed in those terms at the plan-making stage.

On a precautionary basis, and without regard to mitigation, a likely significant effect on the qualifying features of the Salisbury Plain SPA through recreational disturbance (alone and in-combination) cannot be excluded. The effect is therefore screened in for Appropriate Assessment.

Assessment of effects - Bath and Bradford on Avon Bats SAC

LSE – Likely Significant Effect

A - Alone

IC - in-combination

Feature	Relevant Pressure/ Threat	Sensitivity / impact pathway	Risk to Conservation objectives	LSE – A	LSE – IC
S1303 Lesser horseshoe bat, S1304 Greater horseshoe bat, S1323 Bechstein's bat	Fragmentation of commuting routes (lighting)	Functional bat habitat that qualifying species rely on. East and north boundary woodland strip.	SAC Habitats and associated functional SAC habitats Hibernation colonies of horseshoe bats are located within the SAC habitats, including use of mines and caves; which are used year after year and the SAC as a whole supports 15% of the UK population of greater horseshoe bats and internationally significant populations of lesser horseshoe bats. Introduction of lighting can cause fragmentation of flyways as horseshoe bats are highly sensitive to light and will actively avoid lit areas and may abandon commuting routes if they are illuminated. This can then impact accessibility to foraging grounds, night roosts and ultimately impact populations due to reduced breeding success.	Yes	/
S1303 Lesser horseshoe bat, S1304 Greater horseshoe bat, S1323 Bechstein's bat	Disturbance /loss of foraging habitat	Woodland parcels and woodland strip.	No loss of important SAC bats foraging habitat.	No	No
S1303 Lesser horseshoe bat, S1304 Greater horseshoe bat, S1323 Bechstein's bat	Planning permissions	Cumulative impacts across large area and across local authority boundaries.	Without a strategic approach and without appropriate level of surveys, potential impacts may not be fully considered.	No	No
S1303 Lesser horseshoe bat, S1304 Greater horseshoe bat, S1323 Bechstein's bat	Direct impact from third party	Disturbance of roosts.	Hibernating bats highly susceptible to effects of disturbance causing population declines. Disturbance causing them to wake from torpor exhausts their fat reserves and therefore survival. Human activity in confined spaces can alter air flow and temperature changes, indirectly disturbing the bats. There have been one-off incidents in the past, but as acknowledged in the SIP, it's difficult to fully close sites to	No	No
S1303 Lesser horseshoe bat, S1304 Greater horseshoe bat,	Public access / disturbance			No	No

S1323 Bechstein's bat			public access. The SAC/SSSI sites are managed to avoid significant pressures therefore this is screened out, despite the increase in resident numbers in the area.		
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2. APPROPRIATE ASSESSMENT – PART 1, REASONED APPRAISAL OF LIKELY SIGNIFICANT EFFECTS
An assessment of the implications for the SAC/Favourable Conservation Status of Qualifying Species, in view of its Conservation Objectives

Scope of Appropriate Assessment - Bath and Bradford on Avon SAC

The Sites and Qualifying Features for which significant effects (whether 'alone' or 'in combination') are likely and cannot be ruled out and are relevant to this appropriate assessment are:

- S1303 Lesser horseshoe bat
- S1304 Greater horseshoe

Environmental Pressure	Risk to Conservation Objectives and Relevant Design Features and Mitigation Measures
Fragmentation of commuting routes (lighting) S1303 Lesser horseshoe bat, S1304 Greater horseshoe bat, S1323 Bechstein's bat	Without mitigation the introduced lighting associated with the proposals (external and internal light source) could affect the function of hedgerow and woodland habitat by increasing illumination above levels likely to cause adverse disturbance to commuting horseshoe bats and their prey, as well as connectivity between roost sites. Displacement could affect the fitness of greater and lesser horseshoe maternity roosts, and such effects could be considered significant on their favourable conservation status. Conservation Objectives: Without mitigation, artificial lighting associated with the Proposed Development (external and internal) could illuminate the retained boundary hedgerows and the railway corridor, causing avoidance behaviour in the highly light-sensitive horseshoe bats, severance of commuting routes and reduced functional connectivity to the SAC. This could affect the fitness of the SAC populations and undermine the conservation objectives. The Proposed Development has been designed with a suite of embedded lighting mitigation and dark-corridor retention, informed by pre-application consultation with Natural England through the Discretionary Advice Service (DAS). The design retains dark commuting corridors along the unlit western boundary and the eastern railway/watercourse corridor, and establishes Zone A bat habitat buffers in accordance with the Trowbridge and Westbury Bat Mitigation SPD; the buffer along the northern boundary of the southern parcel has been strengthened in response to Natural England's advice. The lighting strategy (Lighting Impact Assessment, DFL ref. 4143-DFL-ELG-XX-RP-EO-13001) has been designed in accordance with ILP GN01:2021 and BCT/ILP GN08:2023 and the SPD, and incorporates luminaires with 0% upward light ratio, warm colour temperatures ($\leq 2700\text{K}$), flat (0°) tilt, minimised mounting heights, back-light shielding, directional optics and motion-sensor controls, with the perimeter residential roads left unlit. Worst-case lighting calculations at the Zone A bat receptors demonstrate light spill of ≤ 0.08 lux, within the GN08:2023 and SPD dark-corridor thresholds of < 0.5 lux and well within the target values of 0.2 lux (horizontal) and 0.4 lux (vertical) for the creation of dark corridors (DFL, ref. 4143; see also ES Appendix 11.4 and the light-spill diagrams). There is therefore no material increase in illuminance on the retained commuting and foraging habitat used by SAC bats.

	There is no loss of functional SAC bat habitat: the key boundary hedgerows and the railway corridor are retained, and the Landscape Strategy (Greenhalgh ref. 377_GLA_XX_XX_DR_L_1001) delivers extensive new native woodland, hedgerow and species-rich grassland that will strengthen the dark foraging and commuting network over time. No roosts are affected. With the embedded lighting mitigation and dark-corridor retention secured (by condition, via the lighting strategy and a Landscape and Ecological Management Plan), there are no residual effects capable of undermining the conservation objectives, alone or in combination with the schemes considered in Chapter 3 of the ES (Glenmore Farm; Land off Storridge Road; Land at Shallow Waggon Lane; Court Farm; and the pending Land at Bratton Road application). <u>Summary</u> There is no loss of suitable bat habitat on site. The Landscape Strategy (chapter 11 of the ES) and BNG assessment show the woodland areas of habitat to be retained and enhanced to improve condition and habitat structure. Other habitat to be created are suitable for supporting support prey species for bats including the buffer tree and mixed shrub planting, species rich other neutral grassland and wetland areas. The majority of these habitats will be retained as dark habitat which will be available for foraging bats. By mitigating impacts of introduced lighting, creating a dense habitat to buffer the foraging and commuting corridor for Annex II species of bats (and other bat species) it is considered that this will maintain the functionality of the Bath and Bradford on Avon SAC features, as well as the Picket and Clanger Woods SSSI to the north of the site, and wider hedgerow and woodland network used by greater and lesser horseshoes and therefore the breeding success (favourable conservation status) for these two qualifying species.
Residual Risks and Cumulative Effects: There are no identified residual risks and appreciable effects likely to arise from this scheme that have the potential to act in-combination with those from other plans or projects.	

Scope of Appropriate Assessment - Salisbury Plains SPA

Where a likely significant effect cannot be excluded at the screening stage, an Appropriate Assessment is undertaken to determine, in view of the site's conservation objectives, whether the Proposed Development would adversely affect the integrity of the European site, taking into account the mitigation embedded within the scheme.

The Application Site is allocated in the adopted Wiltshire Core Strategy (2015) under Core Policy 32 (Westbury Community Area) as the strategic allocation "Land at Mill Lane, Hawkeridge, Westbury". The allocation and the Core Strategy as a whole were subject to Habitats Regulations Assessment at the plan-making stage, which established the principle of development at this location. This project-level assessment tiers from that strategic assessment: the principle of development is established, and this Appropriate Assessment addresses the site- and scheme-specific effects in the detail now required. As the Proposed Development is residential led, whereas the site was allocated for employment use, the recreational disturbance pathway is assessed afresh at the project stage.

The potential effect identified at screening is recreational disturbance to the qualifying bird features arising from the increased population. The Proposed Development provides on-site Suitable Alternative Natural Greenspace (SANG), arranged as a tiered provision (Primary, Secondary and Transitional SANG areas) across the green infrastructure to the north, east and south of the Application Site, designed to attract and retain residents' recreational activity and divert pressure away from the SPA (Greenhalgh SANG plan ref. 377_GLA_XX_XX_DR_L_8001; Site Wide Landscape Plan ref. 377_GLA_XX_XX_DR_L_1001). Over 3ha of area is designated as SANG area, which surpasses the 'not less than 8ha per 1,000 additional population' requirement.

In addition, a financial contribution towards Strategic Access Management and Monitoring (SAMM) will be secured via a Section 106 agreement, together with the securing and long-term management of the SANG through the Section 106 agreement and/or Landscape and Ecological Management Plan.

Customer-Facing Measures Supporting the SANG

The on-site SANG provision is supported by customer-facing measures within Bellway's direct control as the site's developer and vendor, designed to encourage new residents to use the on-site greenspace in preference to travelling to the Salisbury Plain SPA. These measures form part of the mitigation package for the recreational disturbance pathway and are proposed to include:

- information for new residents on the on-site SANG and local walking routes, provided as part of the homebuyer welcome pack;
- on-site interpretation panels explaining the purpose of the SANG and the sensitivity of the Salisbury Plain SPA;
- circular walking routes, dog waste bins and fenced areas for off-lead dog walking within the SANG, to provide a genuinely attractive alternative to the SPA;
- high-quality landscaping and habitat design within the SANG to create an appealing everyday amenity.

Securing these measures, whether through the Section 106 agreement, a Landscape and Ecological Management Plan, or as sales and marketing commitments, strengthens the effectiveness of the on-site SANG and provides confidence, over and above the numeric SANG standard alone, that recreational demand generated by the Proposed Development will be met on site rather than displaced to the SPA.

Strategic Access Management and Monitoring (SAMM)

Strategic Access Management and Monitoring (SAMM) is the area-wide access management and habitat monitoring programme for the Salisbury Plain SPA, delivered collectively across contributing residential schemes as the standard companion measure to on-site SANG. It is administered by Wiltshire Council, working with Natural England and the Ministry of Defence through the monitoring and management strategy referred to at Screening above, and typically funds wardening and access management, monitoring of visitor pressure and qualifying bird populations, and associated habitat management and visitor infrastructure across the wider SPA landholding; contributions are pooled and applied strategically rather than to site-specific works. For Bellway, securing the SAMM contribution together with the on-site SANG is what allows the recreational disturbance effect identified at screening to be concluded as not significant: without it, Natural England and the Council could not conclude no adverse effect on the SPA's integrity. The mitigation is delivered through the wider strategic programme rather than requiring Bellway to fund or manage off-site works itself.

The provision of on-site SANG to the required standard, together with a SAMM contribution, is the strategic mitigation approach endorsed by Natural England for residential development within the SPA disturbance zone and is capable of ensuring that the Proposed Development does not increase net recreational pressure on the SPA. With these measures secured, there are no residual effects, alone or in combination with the other residential schemes considered in Chapter 3 of the ES.

Residual Risks and Cumulative Effects:

There are no identified residual risks and appreciable effects likely to arise from this scheme that have the potential to act in-combination with those from other plans or projects.

3. CONCLUSIONS ON SITE INTEGRITY

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

Other Plans and Projects Considered (In-Combination)

The in-combination assessment below has been informed by the cumulative residential schemes identified in Chapter 3 of the Environmental Statement, comprising the other allocated and pending developments within the relevant Salisbury Plain SPA recreational disturbance zone and/or the Bath and Bradford-on-Avon Bats SAC commuting and foraging catchment. This list should be confirmed against Wiltshire Council's own record of extant permissions and pending applications affecting these European sites prior to submission of the planning application.

- Glenmore Farm – residential allocation within the Salisbury Plain SPA 6.4km recreational disturbance zone. Pathway: recreational disturbance. Mitigation: on-site SANG and a SAMM contribution secured via Section 106 agreement.
- Land off Storridge Road – residential development within the SPA disturbance zone. Pathway: recreational disturbance. Mitigation: on-site SANG and SAMM contribution, as above.
- Land at Shallow Waggon Lane – residential development within the SPA disturbance zone and, where within commuting range, a potential bat lighting pathway. Mitigation: condition-secured lighting design together with on-site SANG and SAMM.
- Court Farm – residential development within the SPA disturbance zone. Pathway: recreational disturbance. Mitigation: on-site SANG and SAMM contribution, as above.
- Land at Bratton Road (pending application) – residential application within the SPA disturbance zone. Pathway: recreational disturbance. Mitigation to be secured through the same strategic SANG-plus-SAMM approach if consented.

Each of these schemes lies within the same recreational catchment as the Application Site and is understood to be subject to (or, for the pending application, proposing) mitigation through the same SANG-plus-SAMM approach endorsed by Natural England, so that the additional recreational pressure arising from each scheme is intercepted at source rather than accumulating as unmitigated pressure on the Salisbury Plain SPA. No other identified scheme lies on the same commuting or foraging corridor as the Application Site's retained dark corridors, so no in-combination lighting-pathway interaction with the Bath and Bradford-on-Avon Bats SAC is identified. On this basis, the Proposed Development's contribution to in-combination effects on either European site is not considered significant, and this conclusion is carried through to the site-specific conclusions below.

Bath and Bradford on Avon Bat SAC

In the absence of mitigation, the Proposed Development has the potential to affect the integrity of the SAC (functional habitat and qualifying species) through the following likely significant effect:

- Loss and fragmentation of commuting and foraging flyways (development and lighting).

The embedded design of the external and internal lighting scheme is assessed to retain dark commuting and foraging corridors that predominantly meet the 0.4 lux vertical and 0.2 lux horizontal thresholds on functional habitat associated with the SAC, with worst-case light spill of ≤ 0.08 lux modelled at the Zone A bat receptors (DFL Lighting Impact Assessment, ref. 4143-DFL-ELG-XX-RP-EO-13001), in accordance with the Trowbridge and Westbury Bat Mitigation SPD, ILP GN01:2021 and BCT/ILP GN08:2023.

The mitigation measures provided within the scheme comprise the retention and buffering of the key commuting and foraging bat corridors along the western hedgerow-lined boundary and the eastern tree-lined railway/watercourse corridor; the retention of dark corridors and Zone A bat habitat buffers, including the strengthened buffer along the northern boundary of the southern parcel provided in response to Natural England's advice through the Discretionary Advice Service; and the provision of a net gain in bat habitat on site, including enhanced foraging and commuting habitat through new woodland,

hedgerow and species-rich grassland creation. No SAC bat roosts are present or affected. These measures mean that the favourable conservation status of the qualifying species of the SAC — greater and lesser horseshoe bats — will be appropriately maintained.

Therefore, it can be concluded, in view of the site conservation objectives, that the Proposed Development (taking into account the scheme's mitigation measures, including the retention of dark corridors on functional habitat and the provision of a net gain in bat habitat on site) will not have an adverse effect on the integrity of the Bath and Bradford-on-Avon Bats SAC, either alone or in combination with other plans and projects (see Other Plans and Projects Considered, above), provided the mitigation is secured and delivered through planning conditions and/or planning obligations.

Salisbury Plains SAC

In the absence of mitigation, the Proposed Development has the potential to affect the integrity of the SPA (qualifying bird features) through the following likely significant effect:

- Recreational disturbance arising from the increased local population within the 6.4km disturbance zone.

The mitigation measures provided within the scheme comprise the provision of on-site Suitable Alternative Natural Greenspace (SANG), arranged as a tiered provision (Primary, Secondary and Transitional SANG areas) designed to attract and retain residents' recreational activity and divert pressure away from the SPA, together with a financial contribution towards Strategic Access Management and Monitoring (SAMM). This SANG-plus-SAMM approach is the strategic mitigation endorsed by Natural England for residential development within the SPA disturbance zone, and ensures that the Proposed Development does not increase net recreational pressure on the qualifying features. This is reinforced by customer-facing measures secured as part of the mitigation package (welcome pack information, on-site interpretation, circular walks, dog waste bins and off-lead areas, and high-quality landscaping) which actively encourage new residents to use the on-site SANG in preference to the SPA (see Scope of Appropriate Assessment - Salisbury Plains SPA, above).

Therefore, it can be concluded, in view of the site conservation objectives, that the Proposed Development (taking into account the scheme's mitigation measures, including the provision of on-site SANG and a SAMM contribution) will not have an adverse effect on the integrity of the Salisbury Plain SPA, either alone or in combination with other plans and projects (see Other Plans and Projects Considered, above), provided the mitigation is secured and delivered through planning obligations.