

Appropriate Assessment of Effects on a European Site

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

PART A: INFORMATION REVIEWED

Information about the plan or project	This Appropriate Assessment (AA) is for the Change of use of Hazelbury Manor (Grade I listed), Dower House (Grade I listed) and The Granary (Grade II listed) from mixed used, residential (C3) and agricultural, to hotel use (C1) with ancillary parking at Hazelbury Manor, Bradford Road, Hawthorn, Corsham, SN13 8HX (Application Number PL/2026/00168). The application site is located within a consultation zone for Greater Horseshoe bats, Lesser Horseshoe bats and Bechstein's bats associated with the Bath and Bradford on Avon Bats Special Area of Conservation (SAC) and therefore has potential to result in significant adverse impact on the special features of that site. Box Mine SSSI, one of the SSSIs which underpins the SAC lies partly within the north of the site. The surrounding woodland, grassland and open water habitats provide vital roosting, commuting and feeding areas for these important populations. The proposals have the potential to result in significant adverse effects on the qualifying features of the Bath and Bradford-on-Avon Bats SAC due to their location within the SAC consultation zones and the presence of functionally linked habitat used by qualifying bat species. The application is supported by the following documents: • Shadow Habitat Regulations Assessment. June 2026. Ethos Environmental Planning. Project No. ETH26-357; • RE: Hazelbury Manor HRA. 30 July 2025. Ethos Environmental Planning; • Ecological Impact Assessment. 12 March 2026. BSG Ecology. Project No. P25-359; • Preliminary Ecological Appraisal. 15 August 2025. BSG Ecology. Project No. P25-359. The ecological information confirms that the wider Hazelbury Manor estate supports habitat suitable for commuting, foraging and roosting bats and forms part of the functionally linked habitat associated with bat populations of the SAC. Surveys recorded activity by Greater Horseshoe Bat, Lesser Horseshoe Bat and Barbastelle Bat across the estate, with the northern woodland and hedgerow boundary identified as an important commuting and foraging corridor connected to the SAC landscape. Static detector surveys recorded 1,749 Lesser Horseshoe bat registrations and 276 Greater Horseshoe bat registrations. The survey work identified a confirmed Lesser Horseshoe bat night roost associated with an estate building onsite. Hazelbury Manor itself supports confirmed roosts of serotine, common pipistrelle and brown long-eared bats. The Dower House and Granary were assessed as having moderate bat roost potential, although no evidence of Annex II bat roosting was identified
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	within either building. The applicant has confirmed that the current submission is intended as a change of use application only to establish the principle of hotel use and support future funding requirements. The current application therefore does not seek consent for detailed operational development beyond the principle of the proposed use, with detailed design, and any associated ecological mitigation to be considered through future applications. Although the proposals do not involve direct impacts to SAC bat roosts or hibernation sites, likely significant effects cannot be excluded in relation to disturbance of commuting and foraging habitat through lighting, disturbance associated with increased visitor use, and impacts to functionally linked habitat arising from future operational development. The principal matters for consideration under this assessment therefore relate to the effect of the change of use on the functionally linked habitat associated with qualifying bat species of the SAC. The proposal has therefore been screened into Appropriate Assessment. <i>In light of the judgement in Case C 323/17 CJEU “people over wind” the Council has determined that the application should be subject to an Appropriate Assessment under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended).</i>
Designated Site	Bath and Bradford on Avon Bats Special Area of Conservation (SAC)
List of interest features	Qualifying Features: 1. Bechstein’s bat <i>Myotis bechsteinii</i> 2. Greater horseshoe bat <i>Rhinolophus ferrumequinum</i> 3. Lesser horseshoe bat <i>Rhinolophus hipposideros</i> The conservation objectives for the site are to: <i>“Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</i> • <i>The extent and distribution of the habitats of qualifying species;</i> • <i>The structure and function of the habitats of qualifying species;</i> • <i>The supporting processes on which the habitats of qualifying species rely</i> • <i>The populations of qualifying species; and</i> • <i>The distribution of qualifying species within the site.”</i> Publication Date: 27th November 2018 – version 3. This document updates and replaces an earlier version dated 30 June 2014 to reflect the consolidation of the Habitats Regulations in 2017.
Information about the designated site	Most SSSI units underpinning the SAC are either favourable or unfavourable recovering. SSSIs comprise disused stone mines which are of key importance as a hibernation and swarming site for three bat species (greater horseshoe, lesser horseshoe and Bechstein’s) because of the combination of temperature and humidity conditions, suitable access, lack of pollution and infilling, and lack of disturbance. The SAC is designated for the hibernating populations of three species of bat: lesser horseshoe, greater horseshoe and Bechstein’s bat, and as a whole, the SAC as a whole supports 15% of the UK population of greater horseshoe bats.

	While the SAC mines are designated for hibernating bats, both lesser and greater horseshoe bats are known to emerge from their hibernation sites during the winter months about once every two weeks for water / food, therefore condition of habitat, including quality of foraging in the immediate vicinity of SSSI sites is considered to be very important (Park, Jones & Ransome 2000)¹ for population numbers. Successful breeding, hibernation, swarming and dispersal are all critical in sustaining the bat populations for all component SSSI sites; these rely on an interconnected landscape for ease of movement, and linked sites for mixing of gene pools. Features of significance within the wider landscape are watercourses, woodland, grazed pasture, parkland, hay meadows, hedgerows, linear trees, scrub and individual feature trees Box Mine's SSSI is designated for hibernating Barbastelle, Bechstein's, Greater Horseshoe and Lesser Horseshoe.
Other relevant plans or projects	• Wiltshire Core Strategy adopted January 2015 • Bat Special Areas of Conservation Planning Guidance for Wiltshire • Corsham Batscape Strategy 2016-2026
PART B: IMPACT PREDICTION ALONE	
Likely Significant Impact(s)	Predicted Effect of Impact(s)
Temporary /permanent loss of foraging and roosting habitat and flight corridors	The application site forms part of the wider landscape used by qualifying bat species associated with the Bath and Bradford-on-Avon Bats SAC. Surveys confirmed activity by Greater Horseshoe Bat and Lesser Horseshoe Bat across the wider estate and identified the northern woodland and hedgerow corridor as an important commuting and foraging route connected to the SAC landscape. No operational development is proposed at this stage and does not result in the loss of woodland, hedgerows, traditional orchard habitat, mature trees, roost structures or identified bat commuting corridors through the current proposal. Consequently, no temporary or permanent loss of foraging habitat, roosting habitat, commuting routes or functionally linked habitat is predicted.
Risk of collision and bat fatality	N/A. The principal habitat features used by bats would be retained.
Does retained core bat habitat connect to the wider habitat network?	Yes. Surveys identified the wider estate as functionally linked habitat associated with the Bath and Bradford-on-Avon Bats SAC. Woodland, hedgerows, traditional orchard and established commuting corridors would be retained and continue to connect with Box Mine SSSI and the wider SAC landscape. Surveys identified the northern woodland and hedgerow corridor as a key commuting route used by bats. As no habitat removal or fragmentation is proposed under the current application, ecological connectivity would remain intact.
Disturbance to bat flight/foraging/roosting	The application does not include any external lighting proposals. However, future lighting associated with hotel use represents a potential impact pathway that cannot be excluded at screening stage as qualifying bat species are highly sensitive to artificial lighting and the northern site

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

activity from light spill	boundary functions as an important commuting corridor. As the current proposal is limited to the principle of change of use and does not authorise operational development or external lighting, no direct lighting impacts would arise from the proposal. Any future operational development requiring lighting would be the subject of separate applications and separate ecological assessment. Therefore, disturbance to commuting, foraging or roosting bats from light spill is not predicted. Any external lighting would require separate approval and would be controlled through a bat-sensitive lighting strategy secured by condition. Subject to implementation of this measure, adverse effects on commuting routes, foraging habitat or roosting bats are not predicted.
Disturbance to bat flight/foraging /roosting activity from noise or human presence – construction and operational phases	The proposal has the potential to increase human activity within the estate through hotel operation. Surveys confirmed a Lesser Horseshoe Bat night roost within an outbuilding elsewhere on the estate and the presence of functionally linked habitat used by SAC qualifying species. Any future operational development, including the car park and associated infrastructure, will be subject to separate applications and ecological review. Consequently, no significant disturbance to commuting, foraging or roosting activity of qualifying bat species is predicted as a result of the current proposal. Construction activity would be limited and controlled through a Construction Environmental Management Plan.
PART C: CONSERVATION OBJECTIVES	
Does the project or plan have the potential to:	
Cause delays in progress towards achieving the conservation objectives of the site?	No. While two of the SSSI units are unfavourable recovering this is based on assessing the suitability of the woodland management within the SAC boundaries for bats. The closest SSSI (Box Mine's) is in favourable condition. No direct impacts to Box Mines SSSI/the SAC are anticipated, and the proposals are not expected to impact on the functionality of Box Mines SSSI/the SAC. The proposal would not result in the loss or deterioration of habitats supporting the SAC qualifying species. No woodland, hedgerows, traditional orchard habitat or key commuting corridors would be lost as part of the development.
Interrupt progress towards achieving the conservation objectives of the site?	No, see above.
Disrupt those factors that help to maintain the favourable condition of the site?	No, see above.
Interfere with the balance, distribution and density of key species that are the	No. Surveys confirmed use of the estate by Lesser Horseshoe Bat, Greater Horseshoe Bat and Barbastelle Bat, together with a confirmed Lesser Horseshoe Bat night roost within an outbuilding on the estate. No SAC qualifying bat roosts would be affected and no key commuting or foraging habitat would be lost under the current proposals.

indicators of favourable condition of the site?	
Cause changes to the vital defining aspects (e.g. nutrient balance) that determine how the site functions as a habitat or ecosystem?	No, see above.
Change the dynamics of the relationships that define the structure and/or function of the site?	No, see above.
Interfere with predicted or expected natural changes to the site?	No.
Reduce the area of key habitats?	No. The current proposal is a change of use application intended to establish the principle of development. Consequently, no woodland, hedgerows, traditional orchard habitat, mature trees or identified commuting corridors would be lost as part of the current proposal.
Reduce the population of key species?	No. No SAC qualifying bat roosts would be lost or disturbed and no significant loss of foraging or commuting habitat would occur. The proposal is therefore not expected to adversely affect the populations of qualifying bat species associated with the SAC.
Change the balance between key species?	No, see above.
Reduce diversity of the site?	No, see above.
Result in disturbance that could affect population size or density, or the balance between key species?	No. Whilst hotel use has the potential to increase visitor activity, no direct impacts to SAC bat roosts, commuting routes or key foraging habitats are proposed. Subject to the implementation of bat-sensitive lighting controls and a Landscape and Ecological Management Plan, significant disturbance to qualifying species is not predicted.

Result in fragmentation?	No. The northern boundary corridor, woodland network, traditional orchard habitat and hedgerow connections would all be retained and continue to provide connectivity between the estate and the wider SAC landscape.
Result in the loss or reduction of key features?	No, see above.

PART E: MITIGATION

The current proposal is a change of use application only, intended to establish the principle of the proposed hotel use. The current application therefore does not seek consent for detailed operational development beyond the principle of the proposed use. No habitat loss, vegetation clearance, engineering works, external lighting, alterations to bat roosts, or impacts to commuting and foraging habitats form part of the proposals.

These measures will be secured through planning conditions restricting the permission to the change of use only. Any future operational development capable of affecting habitats functionally linked to the SAC will be subject to a separate planning application and Habitats Regulations Assessment.

The following appropriate mitigation will be secured via the following planning conditions to ensure no adverse effect on the SAC:

CONDITIONS:

1. Compliance with submitted documents

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

- Shadow Habitat Regulations Assessment. June 2026. Ethos Environmental Planning. Project No. ETH26-357;
- RE: Hazelbury Manor HRA. 30 July 2025. Ethos Environmental Planning;
- Ecological Impact Assessment. 12 March 2026. BSG Ecology. Project No. P25-359;
- Preliminary Ecological Appraisal. 15 August 2025. BSG Ecology. Project No. P25-359;

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

2. Construction Environmental Management Plan (CEMP)

Prior to the commencement of works, including demolition, ground works/excavation, site clearance, vegetation clearance and boundary treatment works, a Construction Environmental Management Plan (CEMP) shall be submitted to the local planning authority for approval in writing. The Plan shall provide details of the avoidance, mitigation and protective measures to be implemented before and during the construction phase, including but not necessarily limited to, the following:

- a. Identification of ecological protection areas/buffer zones and tree root protection areas and details of physical means of protection, e.g. exclusion fencing.
- b. Working method statements for protected/priority species, such as nesting birds, bats, badgers and reptiles.
- c. Mitigation strategies already agreed with the local planning authority prior to determination, such as for nesting birds, Priority Habitat Traditional Orchard, Box Mine SSSI, Woodland, hedgerows and bats; this should comprise the pre-

- construction/construction related elements of strategies only.
- d. Work schedules for activities with specific timing requirements in order to avoid/reduce potential harm to ecological receptors; including details of when a licensed ecologist and/or ecological clerk of works (ECoW) shall be present on site.
 - e. Key personnel, responsibilities and contact details (including Site Manager and ecologist/ECoW).

Development shall be carried out in strict accordance with the approved CEMP.

REASON: To ensure adequate protection and mitigation for ecological receptors prior to and during construction, and that works are undertaken in line with current best practice and industry standards and are supervised by a suitably licensed and competent professional ecological consultant where applicable.

3. Landscape and Ecological Management Plan (LEMP)

Prior to the start of construction, a Landscape and Ecology Management Plan (LEMP) shall be submitted to and approved in writing by the Local Planning Authority. The LEMP will include long term objectives and targets, management responsibilities and maintenance schedules for each ecological feature within the development, together with a mechanism for monitoring success of the management prescriptions, incorporating review and necessary adaptive management to attain targets.

The LEMP shall be implemented in full and for the lifetime of the development in accordance with the approved details.

REASON: To ensure the long-term management of landscape and ecological features retained and created by the development, for the benefit of visual amenity and biodiversity for the lifetime of the scheme.

4. Lighting

No external light fixture or fitting will be installed within the application site unless details of existing and proposed new lighting have been submitted to and approved by the Local Planning Authority in writing. The submitted details will demonstrate how the proposed lighting will impact on bat habitat compared to the existing situation.

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

REASON: To avoid illumination of habitat used by bats.

INFORMATIVES:

Bat Roosts

The roof space of Hazelbury Manor, Bradford Road, Hawthorn, Corsham, SN13 8HX is used as a bat roost. Under the Conservation of Habitats and Species Regulations 2017 (as amended), it is an offence to harm or disturb bats or damage or destroy their roosts. Planning permission for development does not provide a defence against prosecution under this legislation. The applicant is advised that a European Protected Species Licence will be required before any work is undertaken to implement this planning permission. Future conversion of the roof space to living accommodation or replacing the roof could also breach this legislation and advice should be obtained from a professional bat ecologist

before proceeding with work of this nature.

Artificial Lighting

The habitat within the proposed development site and the surrounding area is suitable for roosting, foraging and commuting bats. An increase in artificial lux levels can deter bats which could result in roost abandonment and/or the severance of key foraging areas. This will likely result in a significant negative impact upon the health of bat populations across the region. Artificial light at night can have a substantial adverse effect on biodiversity. Any new lighting should be for the purposes for safe access and security and be in accordance with the appropriate Environmental Zone standards set out by the Institute of Lighting Engineers in their publication GN01:2021, 'Guidance for the Reduction of Obtrusive Light' (ILP, 2021), and Guidance note GN08/23 "Bats and artificial lighting at night", issued by the Bat Conservation Trust and Institution of Lighting Professionals.

Temporary / permanent loss of foraging habitat and flight corridors

The proposal would not result in the loss, modification or disturbance of bat roosts, foraging habitat, commuting routes or other functionally linked habitat associated with the Bath and Bradford-on-Avon Bats SAC. No works are proposed to woodland, hedgerows, traditional orchard habitat, mature trees, grassland habitats relied upon by bats, or the northern woodland corridor identified through survey work as an important commuting and foraging route. No direct impacts to Box Mine SSSI or the SAC are proposed. No external lighting forms part of the current application which will be secured as such. Accordingly, the proposal would not introduce lighting impacts capable of affecting commuting, foraging or roosting activity of Annex II bat species associated with the SAC.

Consequently, no temporary or permanent loss of foraging habitat, roosting habitat, flight corridors or ecological connectivity is predicted as a result of the current proposal. Any future operational development capable of affecting functionally linked habitat associated with the SAC will be subject to separate ecological assessment and consideration under the Habitats Regulations Assessment.

PART F: CONCLUSION

Is the project likely to affect site integrity?

a) Alone?

No

b) In combination with other plans or projects?

No, all planning applications are subject to ongoing work to ensure no loss of foraging or commuting habitats for bats using the SAC hibernation sites (and maternity), particularly by ensuring existing vegetation is left unlit as far as possible, maintaining existing vegetation along key potential flight lines and including additional planting to provide new commuting and foraging habitat for the future.

Surveys and mitigation are carried out in accordance with the Council's Bat Special Areas of Conservation (SAC) Planning Guidance for Wiltshire, which is regularly updated in light of new information and available to download on the council website. This Guidance includes buffer areas around the hibernation sites designated as part of the SAC and other key roost sites, which forms a consultation zone, highlighting where the Council Ecologist should be consulted on planning applications. This consultation zone is also broken down into buffer areas by SAC species. Surveys within the consultation zone are expected to employ a higher level of survey effort and ecological consultants are reminded that they should agree the survey scope of potential development sites with the relevant council ecologist in advance.

Recommendation:

The appropriate assessment concludes no adverse effects on site integrity so the application

can be positively determined subject to suitable mitigation measures being secured by condition and implemented.	
Name of officer(s) making the assessment	Jessica Cracknell, Ecologist Ecology team, Natural & Historic Environment 12/08/2026
Date:	
Natural England Comments	
Name of Natural England officer	
Date:	