Bath & North East Somerset Council

Habitats Regulations Assessment of the Bath & North East Somerset Core Strategy (Local Plan Part 1) September 2009 to June 2014

July 2014

Contents

1. Purpose of this report

1.1 This document provides a record of the Habitat Regulations Assessment (HRA) process undertaken for the production of the B&NES Core Strategy (Local Plan Part 1) in accordance with the *Conservation of Habitats and Species Regulations* 2010

2. Background

2.1 Under Regulations 102-105 of the Conservation of Habitats and Species Regulations 2010 (the Habitat Regulations) all strategic and local development plans must be assessed for their impacts upon a network of European wildlife sites (European Sites). These regulations transpose the requirements of the EC Habitats Directives into to UK law and are designed to protect the integrity of European Sites. They require the assessment of impacts and avoidance of harm to the Conservation Objectives of European sites. The process is generally referred to as a Habitats Regulation Assessment (HRA).

2.2 HRA is an iterative, two staged process, which should be applied at points throughout the plan making process. It should be used to help shape, form, and refine the Development Plan so that adopted policies and site allocations do not result in adverse impacts to the integrity of European sites.

2.3 The first stage of the process involves an assessment or screening of whether the plan is likely to have a significant effect on one or more European sites either alone or in combination. A precautionary approach should be used when assessing likely significant effect, and all opportunities should be taken to avoid or mitigate impacts, to prevent any likelihood of a significant effect. Where the likelihood of a significant effect cannot be excluded the process moves to the second stage and an Appropriate Assessment must be undertaken. This represents a more detailed investigation and assessment of possible effects. Except in exceptional circumstances, where there are no alternative solutions and where there are imperative reasons of overriding public interest, Development Plans should only be adopted if the Appropriate Assessment ascertains that the plan will not adversely affect the integrity of any European Site.

3. The HRA of the B&NES Core Strategy – over view of approach

3.1 An iterative and pre-cautionary approach to assessing the impacts of plan proposals upon European Sites was adopted for the B&NES Core Strategy Assessments have been undertaken at each stage of plan production, beginning with the initial Core Strategy Options document, and ending with consideration of the final Core Strategy proposed for adoption. Possible cumulative effects were considered at each stage. A

precautionary approach was taken throughout when assessing the likelihood of a significant effect and all plan policies and proposed site allocations were considered, together with plan modifications resulting from public consultation and from each examination in public.

3.2 At each stage, where necessary and appropriate, policy wording and site development requirements were modified or changed to avoid and/or reduce any potential negative impacts identified by the HRA process. This included addressing the results of consultation with Natural England, and guidance from bat experts including Dr Roger Ransome. This process successfully enabled any likelihood of significant effects to be avoided.

Context and issues for the iterative HRA process

3.3 At the start of the process when the Core Strategy Options Document was assessed in 2009, an initial scoping of all European Sites within a 15km radius of the District was undertaken using digital data supplied by Natural England for the ST square. This identified a long list of 13 sites for initial review and consideration. Salisbury Plain SAC and SPA lies outside of the ST Square but within 15km of the District. This is screened out from further review as no scope for effects to occur is identified.

3.4 The details of these sites are listed in **Appendix 1** and their distribution is shown in **Map 1**. At no stage did the Core Strategy include any policies with a direct impact on any of these sites. As a result, the HRAs were concerned with discerning the likelihood for, and significance of, any indirect effects to occur.

4. European Sites

4.1 The long list of sites was subject to an initial scoping of potential impacts. This led to the filtering out of those sites where no likelihood of a significant effect could be quickly identified. At this stage three sites were screened in for further scrutiny of likely significant effects:

- Chew Valley Lake SPA
- Bath & Bradford on Avon Bat SAC
- Mendip Hills Bat SAC

4.2 The results of the assessments are summarised below.

4.3 At the next stage of plan production in 2010 (Publication Document), the Mells Valley SAC was screened back in for more detailed scrutiny due to the possibility that foraging areas could be affected. For all remaining stages of the Core Strategy HRA, these 4 European Sites were considered for detailed review and scrutiny of the

likelihood of a significant effect of plan changes and modifications. All other sites are screened out from further review.

4.4 Three of these sites relate to the protection and conservation of both Greater and Lesser Horseshoe bats. The Bath & Bradford on Avon Bat SAC is also designated for Bechstein's bats. The issues and approach to assessing the likelihood of significant effects on these sites is therefore similar, and common details are set out below. The other site, Chew Valley SPA, is a man-made lake that supports internationally important populations of Shoveler duck. The issues and approach for this site are set out below.

Chew Valley Lake – issues and approach

4.5 Chew Valley Lake is a large artificial lake that provides an important wintering site for Shoveler duck. The following types of impact will need to be considered for this site.

- Damage to habitat through reduction of water levels
- Damage to habitat through changes to water quality
- Disturbance to birds
- Disruption/ fragmentation of flight lines

Bat sites – issues and approach

Greater Horseshoe Bats -

4.6 The foraging behaviour of Greater horseshoe bats is relatively well understood. Greater Horseshoe bats forage on a range of insects depending upon their availability and accessibility. Different insect prey are available at different times of year and from different habitat types, and a bats ability to forage depends upon its age and experience. Studies suggest that they prefer to forage within broadleaved woodland and adjacent pastures in spring, and then move further afield to meadows and pastures in the summer. They seek the best feeding opportunities to achieve greatest foraging efficiency. Most adult foraging occurs within 4km of the main breeding roost (Roost Sustenance Zone). Ransome (2009) reports adults generally forage between 3-5km of the main breeding roost in mid-summer and much smaller distances in Spring and Autumn, generally less than 1Km. Greater Horseshoe bats prefer cattle grazed permanent pastures which have a well-developed vegetation structure. Young bats are typically restricted to a 1km radius of their breeding roost (Young sustenance zone) (Duverge 1996).

Lesser Horseshoe Bats –

4.7 The foraging behaviour of Lesser Horseshoe bats is less well understood but they do have quite similar requirements to Greater Horseshoe Bats. Studies indicate they prefer to forage within broadleaved woodland in close proximity to their roost (<2km) (Knight 2006).

Bechstein's Bats –

4.8 The Bechstein`s bat is a rare tree-dwelling bat, mostly associated with old growth broadleaved woodland. A few individuals are found in underground sites during hibernation, but it is likely that most individuals roost in trees all year (BCT 2011). The Bath & Bradford on Avon Bat SAC is used by small numbers of these bats for hibernation but no maternity roosts are known locally.

4.9 A recent study of the foraging rage of Bechstein's bats in Grafton wood SSSI, Worcestershire concluded "Irrespective of season, all but one of the bats tracked stayed within 1.5km of their day roosting sites".

Bat data

Potential effects to Bat sites

4.10 For the 3 bat sites screened in for detailed review and scrutiny of likely significant effect, a range of shared potential issues and effects were identified as summarised below:

Potential Issues
Increased recreational pressures
Increased noise and light pollution
Traffic generated air pollution
Increased urban-fringe pressures (domestic cats; noise; disturbance –potentially reducing agricultural viability)
Reduced viability and potential loss of existing agricultural landuse
Potential Effects
Reduction of habitat quality and function close to some sites (including function as foraging grounds or access ways)
Habitat loss close to some sites
Habitat fragmentation

4.11 These issues were considered through the assessment process.

5. Plan Stages subject to HRA

5.1 Plan production has been long and complex, and involved three groups of hearings at the Examination stage. At each stage of plan production where major changes and modifications were made an HRA was undertaken as part of the iterative process. The key points for each stage of the process are summarised below:

HRA of the Core Strategy Spatial Options-, September 2009 (CD4/A9)

5.2 The Core Strategy Options Document included a District wide locational strategy; District wide core policies; Spatial Options for Bath & Keynsham and options for urban extensions; including to the South of Bath. Options for up to 15,500 new

homes were originally proposed to deliver the requirements of the Draft Regional Spatial Strategy (RSS).

5.3 The HRA focused upon screening for likely significant effect of these options, and the identification of plan based mitigation measures. This approach was adopted to identify issues and details that would need to be addressed prior to the production of the Publication Document (Draft Core Strategy), effectively to identify opportunities for plan amendment and modification to ensure no adverse effects upon the integrity of any European Site. The Publication Document (2010) was informed by the results of this assessment.

5.4 A sequential / systematic approach to screening for likely significant effect was applied. First a basic audit of relevant sites was undertaken. This identified 13 NK2 sites within a 15km radius of the West of England area.

5.5 The main elements of the Core Strategy, including development options and policy areas were then considered in terms of possible effect on these sites. This approach filtered out 10 NK2 from further review or investigation, and identified 3 sites which were considered to require greater scrutiny and review. The sites identified for detailed screening are:

- Bath & Bradford-on-Avon Bats SAC
- Chew Valley SPA
- North Somerset and Mendip Bats SAC

5.6 The assessment then considered possible impacts and effects upon these sites and concluded:

There are a number of policy areas that need amendment to ensure NK2 sites are not adversely affected:

The Infra Structure Policy could result in an adverse impact upon the integrity of the Bath and Bradford on Avon SAC. There is insufficient information on the likely outcome of this policy framework to judge scope for mitigation. It is essential that details are clarified and measures to protect the SAC are identified within the Submission Document.

The SWB broad location for an urban extension area (option 2) (capacity for 2000 homes) has the potential to adversely affect the integrity of the Bath and Bradford on Avon SAC. It is considered that there may be scope for mitigation to be secured within the Core Strategy as part of the development requirements for this option. This would need further study and work. In the absence of adequate mitigation this option would be difficult to pursue.

5.7 A series of recommendations were then made to guide the production of draft Core Strategy.

Natural England made the following comments at this stage (CD8/2):

"*We welcome the Council's precautionary approach to assessing the potential impact of the emerging Core Strategy policies on European protected sites.*

As noted in the introduction, the report represents the first stages of the assessment process and is not a full blown Appropriate Assessment.

We are satisfied that the assessment has identified relevant sites, their qualifying features and the potential issues and effects on these. However further work is needed, in particular mitigation opportunities need to be better understood."

Link to **CD4/A9:**
http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/SpatialOptions/CSSO-HabitatRegsAssessment.pdf

HRA of the Draft Core Strategy, November 2010 (CD4/A16)

5.8 The Draft Core Strategy (Publications Document) included a major change of approach to housing provision to that set out at the Options stage, with no urban extensions or green field development proposed, and no major new infra-structure. It also included other policy modifications and change to address the policy issues raised through the Options HRA. These changes included reduced provision for new housing, seeking a total of 11,000 new houses. This, together with policy wording designed to address the concerns raised by the Options Document HRA, represents a major change in terms of potential impacts to European sites.

5.9 The HRA of the Publications Document checked each element of the plan – all spatial strategies and policies, both alone and in-combination, for the likelihood of causing significant negative effects upon the features of importance to European sites within and adjacent to B&NES. It also considered the effects of the plan as a whole.

5.10 Elements of the Core Strategy were reviewed to gain an initial understanding of where and what the main changes to the district would be, and how these changes could affect European sites. Specifically, the type, quantity, location and nature of change were considered. Given the nature and extent of development proposed the following sections were identified as needing detailed review:-

- Chapter 1: Vision & District-wide spatial strategy
- Chapter 2: Shaping the future of Bath - a spatial strategy
- Chapter 5: Rural Areas Spatial Strategy
- Chapter 6: Core policy framework

5.11 Given the character of the plan area; the degree of change proposed, and the nature of European sites that could be affected, the main areas of uncertainty identified

through the assessment process related to the implementation of some of the over-arching policies, and to general development and housing policies that were not spatially specific. In order to address these uncertainties the overarching policy DW1 was amended to include a specific clause to protect biodiversity and sites, species and habitats of European importance. Similarly, other district wide policies have been amended to include clauses to protect the integrity of European habitats, including amendments to Policy CP5 Environmental Quality (now CP6) and text of Policy CP1. In addition, the lower tier Placemaking Development Plan Document proposed is identified as having a major role to play in the protection of European sites.

5.12 Given these changes, and whilst taking a pre-cautionary approach, the HRA concluded:

The Core Strategy is not likely to result in significant effects to any European site within or adjacent to the District, either alone or in combination with other plans or projects.

5.13 These conclusions were supported by Natural England (CD4/A22).

5.14 The Draft Core Strategy was then submitted to the Secretary of State for Examination in May 2011.

Link to **CD4/A16:**
http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/InfoPapersandAppraisals/DCSAppraisal-HabitatRegulationAssessment.pdf

HRA of Proposed Changes to the Draft Core Strategy, September 2011 (CD4/A18)

5.15 A number of changes to the publications Document were proposed in September 2011. These resulted from issues raised through the preliminary comments and questions from the Inspector (ID/1) appointed to conduct the Core Strategy Examination, and, from the response to issues raised during consultation on the Publication version of the Core Strategy (approved under the delegated arrangement agreed by Council on 2 December 2010).

5.16 The majority of the changes proposed were very minor and relate to changes within the supporting text as opposed to policy changes. These changes were initially reviewed very simply to determine whether they would result in any change to ground conditions that could then impact upon European sites. This clarified that the majority of changes were of no real consequence in terms of physical change on the ground, and so would not result in any new or significant impacts to any European site. One exception was identified, which if implemented would result in the

development and change of use of an existing green field site and so had some potential for impacting upon European sites.

5.17 The policy change was: *the additional requirement within policy B1 to provide an upstream flood storage facility. Details are as follows*:

d: Implementing an upstream flood storage facility to enable development in vulnerable areas of the Central Area and Western Corridor.

5.18 The HRA concluded:

The majority of changes proposed for the Core strategy would not impact upon any European site. If the location of the flood storage facility is selected sensitively to avoid highly valued bat habitat, as required by existing planning legislation, and which will be a requirement of the Placemaking DPD, then it is considered that the core strategy changes proposed would not have any significant effects upon any European site. This will require specific site development requirements for the flood storage facility within the Placemaking DPD.

5.19 These conclusions were supported by Natural England (CD4/A22, page 8).

Link to **CD4/A18:**
http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/ProposedChanges/DCSPC-HabitatRegulationsAssessment.pdf

HRA of the Proposed Changes to the Submitted Core Strategy, March 2013 (CD9/A2) - (corrected March 2014)

5.20 In June 2012 the Examination in Public of the Core Strategy Publications Document was suspended to enable the inspectors concerns on housing numbers to be addressed. The council undertook further work to address the inspector's preliminary conclusions. This led to further changes to the Core Strategy including most notably in terms of HRA provision for an additional 1,870 houses at 6 strategic green field locations and some additional greenfield development in the Somer Valley and the rural areas.

5.21 The HRA of this major change looked at the possible impacts of the housing numbers and locations proposed, and the likelihood of any significant effects upon any European site. At this stage other more minor changes were also proposed including removal of the requirement for an upstream flood storage capacity from policy B1. All these changes were screened for likely impacts to European sites.

5.22 The detailed HRA process for the most significant policy changes (as approved by Council on 4th March 2013) concluded that whilst there was some potential for significant impacts to result from development at Odd Down, Ensleigh and Weston, this could be avoided by inclusion of development requirements within the strategic

policies, and through the requirement of the Placemaking Plan to be subject to the HRA process. Detailed site requirements were therefore added into the policy changes. These policies were then re-assessed and, whilst adopting a pre-cautionary approach, it was concluded that no significant impacts were likely. No in-combination effects were identified either.

5.23 To provide added clarity and certainty the changes to the Submitted Core Strategy also included the following addition to the text within the District Wide section of the Core Strategy:

"For clarity, development likely to have a significant effect on a European site either alone or in combination with other plans or projects, and which cannot be adequately mitigated, would not be in accordance with the development plan."

5.24 The HRA concluded:

The combination of measures outlined (above) provides a robust approach for the proposed policy changes to the submitted Core Strategy to avoid any likelihood of a significant adverse effect upon any European Site. Therefore the HRA does not progress to Step 3 of the HRA process, and concludes that the policy changes are not likely to result in a significant effect upon any European site either alone or in combination with other plans or projects.

5.25 These findings were supported by Natural England in their Representations on the Main Modifications March 2013 (pg. 563 of CD9/PC6).

Link to **CD9/A2A:**
http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/ProposedChanges/cd9-a2a_hra_march_2013_revised.pdf

HRA of the Core Strategy Amendments, November 2013 (CD10/A2)

5.26 The Core Strategy was subject to further amendment in November 2013 when Green Belt boundary changes and development allocations were proposed to enable these sites to make the required contribution to the first 5 years housing land supply from plan adoption. This was required by the Planning Inspector and resulted in a number of specific policy changes and site allocations.

5.27 This HRA considered the impacts of two key policy amendments (Policy B3A and Policy B3B) affecting land at Odd Down and Weston.

5.28 To support this HRA work, additional Bat Activity Surveys were conducted for the Weston Area.

5.29 Building on the findings of the previous HRA work and the additional bat surveys, and in response to comments from Natural England and the Planning Inspector, detailed site development requirements designed to safe guard bat interests and to avoid significant effects, were identified as part of the strategic policy changes.

5.30 The HRA concluded:

It is considered that the approach to site allocation and the use of site development requirements and concept diagrams provides a robust approach to the protection and enhancement of SAC bat foraging conditions at Weston and Odd Down. (These details have been developed in discussion and consultation with Dr Roger Ransome of Bat Pro Ltd and with officers from Natural England).

In addition the Core Strategy includes the following clarification: "For clarity, development likely to have a significant effect on a European site either alone or in combination with other plans or projects, and which cannot be adequately mitigated, would not be in accordance with the development plan."

On the basis of objective information available, and on the assumption that all development requirements are secured and properly implemented, the likelihood of a significant effect on the SAC identified is excluded in relation to these policy amendments.

This applies to the implementation of the policy change individually and 'in combination' with other plans.

5.31 This process was informed by discussions with Natural England who supported the findings of the HRA (page 156 of CD12/19):

"Bath & Bradford on Avon Bat SAC

Natural England welcomes the further bat surveys and detailed analysis of these that have been undertaken by the Council's ecologist and consultant bat expert. We are satisfied that the detailed policy requirements set out in Policy B3A and Policy B3B have been underpinned by sound evidence and should help to ensure development at Odd Down and Weston Slopes does not result in an adverse impact on the integrity of the European Site."

Link to **CD10/A2:**
http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/CoreDocumentsnotsavedelsewhere/cs_amendments_hra.pdf

5.32 During the Examination the Council issued a note (BNES/55) to clarify the HRA processes and documentation in response to points raised during the preparation for the Hearings in 2014.

Link to **BNES/55:**
http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/Examination/bnes55_hra_addendum.pdf

HRA of the Core Strategy (Local Plan part 1) as proposed to be adopted July 2014

5.33 The Core Strategy Amendments November 2013 (including changes assessed at March and November 2013) were then subject to Examination in Public in March / April 2014 to determine soundness of the Plan. In June 2014 the Inspector reported that the plan is 'sound' subject to a number of modifications including the deletion of policy B3B, proposed Strategic Site Allocation for 150 houses and associated Green Belt changes at Weston.

5.34 These changes will result in less environmental change than the plan as proposed to be amended in November 2013, with no green field development at Weston and reduced housing numbers. These changes do not therefore need to be subject to HRA.

5.35 The Inspector, in his Report on the Examination into B&NES Council's Core Strategy dated 24 June 2014 makes the following statement in support of the HRA:

"I give considerable weight to the favourable conclusion of Natural England. It is reasonable to expect it to have given careful consideration to the potential effect of development on a SAC, particularly as it had concerns at an earlier stage, but is now satisfied that it has been properly addressed. There is longstanding shared experience on this issue locally between the Council, Natural England and experienced bat researchers. Given this context, the fact that the research undertaken at Weston may not have followed normal recommended practice is not significant because the surveys were informed by considerable knowledge of bat behaviour around Bath.

With the mitigation measures proposed in the allocation policies, I am satisfied that the Habitat Regulations are met and that harm to the SAC would be avoided. The references to ecological compensation in the allocation policies do not therefore relate to bats and are necessary only in relation to other species, such as alternative provision for skylarks at Odd Down."

6. Summary and Conclusions

6.1 The HRA process has been iterative; precautionary and robust, and has involved regular consultation and liaison with Natural England. Advice and guidance has been taken from bat experts. Plan amendments and modifications have been made as appropriate to avoid likely significant effects to European Sites within or adjacent to the District.

6.2 Using a precautionary approach and taking into account all mitigation measures proposed it is concluded that no significant effects are likely to occur.

Appendix 1: Details of European Sites identified for review and broad scoping of effects

NATURA 2000 SITE NAME	QUALIFYING FEATURES	CONSERVATION OBJECTIVES SUMMARY	Vulnerabilities	Scope for effects to occur	Reasons/Comments
Avon Gorge Woodlands SAC	**Annex I Habitats that are a primary reason for selection:** *Tilio-Acerion* forests of slopes, screes and ravines **Annex I Habitats present as a qualifying feature, but not a primary reason for selection of this site:** Semi-natural dry grasslands and scrubland facies on calcareous substrates (*Festuco-Brometalia*)	CO's are by SSSI. COs relevant to the SAC: To maintain, in favourable condition, the *Tilio-Acerion* forests of slopes, screes and ravines; Semi-natural dry grasslands and scrubland facies on calcareous substrates.	Air quality - this site suffers from traffic generated road pollution. APIS report suggest site already exceeds the critical load for woodlands. Any increase in traffic generation could have an effect on this site. Habitat damage & disturbance from increased recreational pressures.	no	Possible air pollution issue if Core Strategy generates traffic movements along the Portway. Polluting effects feasible due to configuration of gorge and road. Likelihood of significant increased traffic movements along the Portway considered low.
Bath & Bradford-on-Avon Bats SAC	**Annex II species that are a primary reason for selection of the site:** *Rhinolophus ferrumequinum* (Greater horseshoe bat) ***Myotis bechsteinii*** (Bechstein's bat) **Annex II species present as a qualifying feature, but not a primary reason for selection of this site:** *Rhinolophus hipposideros* (Lesser horseshoe bat)	CO's are by SSSI. COs relevant to the SAC: To maintain, in favourable condition, habitats for the population of *Rhinolophus ferrumequinum* (Greater horseshoe bat), *Rhinolophus hipposideros* (Lesser horseshoe bat) and *Myotis bechsteinii* (Bechstein's bat).	Potential for loss of foraging areas due to development; increased habitat disturbance & deterioration from urban impacts -noise, light pollution, domestic pets, increased recreational pressures. Horseshoe bats need suitable feeding areas close to their roosts (GHB typically forage 3-5km from roost & generally <1km in Spring & autumn; LHB forage v. close to roosts, in summer 2-3km) but ,will forage 9km+ from roosts at times. Their foraging requires permanent pasture grazed by stock, and a network of hedges and other linear features. Expansion of urban fringe areas could reduce livestock farming and adversely affect foraging habitat	likely	Possible impacts upon bat foraging grounds
Chew Valley SPA	Internationally important bird assemblage. This site qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species: Over winter: *Anas clypeata* (Shoveler)	No significant decrease in relation to water reference level. No significant displacement of birds attributable to human disturbance. No significant reduction in presence and abundance of food species including aquatic plants and aquatic invertebrates.	The lake is the main source of drinking water for the District with the exception of Bath, and is also a key recreational site (trout fishing, sailing and walking). The site is owned and managed by Bristol Water Plc, who implement a nature conservation strategy for the site, including a zoning scheme for the lake to safeguard wildlife. Potential for increase in visitors to the site and increased pressure on the quiet refuge area, and increases in water consumption.Shoveler numbers, and those of the other ducks, tend to be higher in years when there is significant late summer drawdown of water at Chew Valley Lake. The Draft Bristol Water Plan takes account of forecast growth to plan water supply for the next 25years.	possible	Possible issues related to wind turbines if migratory routes affected, and increased water consumption

NATURA 2000 SITE NAME	QUALIFYING FEATURES	CONSERVATION OBJECTIVES SUMMARY	Vulnerabilities	Scope for effects to occur	Reasons/Comments
Mells Valley SAC	**Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:** Semi-natural dry grasslands and scrubland facie: on calcareous substrates (*Festuco-Brometalia)* Caves not open to the public **Annex II species that are a primary reason for selection of the site:** *Rhinolophus ferrumequinum* (Greater horseshoe bat)	CO's are by SSSI. COs relevant to the SAC: To maintain, in favourable condition, the Caves not open to the public and Semi-natural dry grasslands. And, to maintain, in favourable condition, habitats for the population of *Rhinolophus ferrumequinum* (Greater horseshoe bat).	Potential for loss of foraging areas due to development; increased habitat disturbance & deterioration from urban impacts -noise, light pollution, domestic pets, increased recreational pressures. Greater Horseshoe bats need suitable feeding areas close to their roosts (GHB typically forage 3-5km from roost & generally <1km in Spring & autumn) but ,will forage 9km+ from roosts at times. Their foraging requires permanent pasture grazed by stock, and a network of hedges and other linear features. Expansion of urban fringe areas could reduce livestock farming and adversely affect foraging habitat. Grassland & cave habitat vulnerable to increased recreational pressures and grassland vulnerable to increased. Vulnerable to air pollution from increased nitrogen deposition and acidic dust deposition.	possible	No direct impacts to SAC habitats and indirect impacts through air pollution and recreational pressures not likely to be significant. Greater Horseshoe Bats from Mells are known to forage within B&NES (Bob Corns pes com 2009), also Geof Belington's report identified a link between the BBA SAC bats and the Mells SAC. Further information needed to assess likelihood of any knock on effects.
Mendip Limestone Grasslands SAC	**Annex I habitats that are a primary reason for the selection of the site:** Semi-natural dry grasslands and scrub facies on calcareous substrates (*Festuco-Brometalia*) **Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:** European dry heaths *Tilio-Acerion* forests of slopes, screes and ravines Caves not open to the public **Annex II species present as a qualifying feature, but not a primary reason for selection of this site:** *Rhinolophus ferrumequinum* (Greater horseshoe bat)	CO's are by SASSY. COs relevant to the SAC: To maintain, in favourable condition, the Tilio-Acerion forests of slopes, screes and ravines; Caves not open to the public; European dry heaths and Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco brometalia). And, to maintain, in favourable condition, habitats for the population of Rhinolophus ferrumequinum (Greater horseshoe bat). *Rhinolophus hipposideros* (Lesser horseshoe bat) are also included in the COs.	Habitat disturbance and degradation from increased recreational pressure and dog walking, and would be vulnerable to a reduction in live stock farming thats sustains the habitat. Vulnerable to air pollution from increased nitrogen deposition and acidic dust deposition.	no	Significant distance (approx 9km) from B&NES - no direct or indirect effects anticipated
Mendip Woodlands SAC	**Annex I habitats that are a primary reason for the selection of the site:** *Tilio-Acerion* forests of slopes, screes and ravines	CO's are by SASSY. COs relevant to the SAC: To maintain, in favourable condition, the *Tilio-Acerion* forests of slopes, screes and ravines.		no	Significant distance from B&NES - no indirect effects anticipated - potential for air pollution issues from road traffic generation discounted due to opportunities for dispersal of pollutants.

NATURA 2000 SITE NAME	QUALIFYING FEATURES	CONSERVATION OBJECTIVES SUMMARY	Vulnerabilities	Scope for effects to occur	Reasons/Comments
North Somerset and Mendip Bats SAC	**Annex I habitats that are a primary reason for the selection of the site:** Semi-natural dry grasslands and scrub facies on calcareous substrates (*Festuco-Brometalia*) *Tilio-Acerion* forests of slopes, screes and ravines **Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:** Caves not open to the public **Annex II species that are a primary reason for selection of the site:** *Rhinolophus ferrumequinum* (Greater horseshoe bat) *Rhinolophus hipposideros* (Lesser horseshoe bat)	CO's are by SASSY. COs relevant to the SAC relate to Annex II species: To maintain, in favourable condition, habitats for the population of *Rhinolophus ferrumequinum* (Greater horseshoe bat) and *Rhinolophus hipposideros* (Lesser horseshoe bat).	Potential for loss of foraging areas due to development; increased habitat disturbance & deterioration from urban impacts -noise, light pollution, domestic pets, increased recreational pressures. Horseshoe bats need suitable feeding areas close to their roosts (GHB typically forage 3-5km from roost & generally <1km in Spring & autumn; LHB forage v. close to roosts, in summer 2-3km) but ,will forage 9km+ from roosts at times. Their foraging requires permanent pasture grazed by stock, and a network of hedges and other linear features. Expansion of urban fringe areas could reduce livestock farming and	possible	Possible impacts upon bat foraging grounds
River Usk / Afon Wysg SAC	**Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:** Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitricho-Batrachion* vegetation **Annex II species that are a primary reason for selection of the site:** *Petromyzon marinus* (Sea lamprey) *Lampetra planeri* (Brook lamprey) *Lampetra fluviatilis* (River lamprey) *Alosa fallax* (Twaite shad) *Salmo salar* (Atlantic salmon) *Cottus gobio* (Bullhead) *Lutra lutra* (Otter) **Annex II species present as a qualifying feature, but not a primary reason for selection of this site:** *Alosa alosa* (Allis shad)	**4.1.1 The capacity of the habitats in the SAC to support each feature at near-natural population levels, as determined by predominantly unmodified ecological and hydromorphological processes and characteristics, should be maintained as far as possible, or restored where necessary.** **4.1.2 The ecological status of the water environment should be sufficient to maintain a stable or increasing population of each feature. This will include elements of water quantity and quality, physical habitat and anticipated that these limits will concur with the relevant standards used by the Review of Consents process given in Annexes 1-3** **4.1.3 Flow regime, water quality and physical habitat should be maintained in, or restored as far as possible to, a near-natural state, in order to support the coherence of ecosystem structure and function across the whole area of the SAC.**	Vulnerable to riparian habitat degradation from increased recreational pressures, reduced farming viability, and vulnerable to increased water abstraction.	no	Significant distance from B&NES - no direct or indirect effects anticipated

NATURA 2000 SITE NAME	QUALIFYING FEATURES	CONSERVATION OBJECTIVES SUMMARY	Vulnerabilities	Scope for effects to occur	Reasons/Comments
River Wye / Afon Gwy SAC	**Annex I habitats that are a primary reason for the selection of the site:** Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitricho-Batrachion* vegetation **Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:** Transition mires and quaking bogs **Annex II species that are a primary reason for selection of the site:** *Austropotamobius pallipes* (White-clawed crayfish (or Atlantic stream) crayfish) *Petromyzon marinus* (Sea lamprey) *Lampetra planeri* (Brook lamprey) *Lampetra fluviatilis* (River lamprey) *Alosa fallax* (Twaite shad) *Salmo salar* (Atlantic salmon) *Cottus gobio* (Bullhead) *Lutra lutra* (Otter) **Annex II species present as a qualifying feature, but not a primary reason for selection of this site:** *Alosa alosa* (Allis shad)	CO's are by SASSY. **These are dated 2001 and should be used with caution.** COs relevant to the SAC: To maintain, in favourable condition, floating formations of water crowfoot (*Ranunulus)* of plain and sub-mountainous rivers. Also populations of atlantic salmon *(Salmo salar),* allis shad *(Alosa alosa),* twaite shad *(Alosa fallax),* bullhead *(Cottus gobio),* brook lamprey *(Lampetra planeri),* river lamprey *(Lampetra fluviatilis),* sea lamprey *(Petromyzon marinu* s*),* white-clawed crayfish *(Austropotamobius pallipes).* Also the river adjoining land as habitat for populations of otter *(Lutra lutra).* ***Also contact CCW.***	Vulnerable to increased water abstraction and recreational pressures.	no	Significant distance from B&NES - no indirect effects anticipated
Severn Estuary SAC, SPA and Ramsar	***SAC*** **Annex I habitats that are a primary reason for the selection of the site:** Estuaries Mudflats abd sandflats not covered by seawater at low tide Atlantic salt meadows **Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:** Sandbanks slightly covered by sea water all the time Reefs **Annex II species that are a primary reason for selection of the site:** *Petromyzon marinus* (Sea lamprey) ***Lampetra fluviatilis (River lamprey)*** *Alosa fallax* (Twaite shad)	**SAC & Ramsar**: To maintain, in favourable condition estuaries subtidal sandbanks; intertidal mudflats and sandflats; Atlantic salt meadows; reefs. Also, to maintain in favourable condition, River lamprey (*Lampetra fluviatilis)* , sea lamprey (*Petromyzon marinus*) and Twaite shad (*Allosa fallax*).	Habitats vulnerable to increased recreational pressures; habitat degradation from domestic & industrial pollution,& development; Habitat loss from Port expansion & other development.		

	SPA **This site qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:** Over winter: *Cygnus columbianus bewickii* (Bewick's swan) **Internationally important bird assemblage. This site qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species:** On passage: *Charadrius hiaticula* (Ringed plover) Over winter: *Numenius arquata* (Curlew) *Calidris alpina alpina* (Dunlin) *Anas acuta* (Pintail) *Tringa totanus* (Redshank) *Tadorna tadorna* (Shelduck)	**SPA & Ramsar:** To maintain, in favourable condition, habitats for and the population of Berwick's swan and populations of regularly occurring migratory species including shelduck, dunlin, redshank, European white-fronted goose. And to maintain, in favourable condition habitat for and the assemblage of wintering waterfowl.			
	Ramsar **Assemblage qualification: A wetland of international importance.** The area qualifies under Article 4.2 of the Directive (79/409/EEC) by regularly supporting at least 20,000 waterfowl *Criterion 1:* Presence of *Annex I* features listed above for cSAC. *Criterion 3* : Unusual estuarine communities. *Criterion 4* : Run of migratory fish between sea and river via estuary. *Criterion 5/6* : Bird assemblages and species of international importance. *Criterion 8* : Diverse fish populations, important feeding, nursery ground and migration route.	**See above (there are no individual COs for the Ramsar designation.**		no	Significant distance from B&NES - no indirect effects anticipated

NATURA 2000 SITE NAME	QUALIFYING FEATURES	CONSERVATION OBJECTIVES SUMMARY	Vulnerabilities	Scope for effects to occur	Reasons/Comments
Wye Valley & Forest of Dean Bat Sites SAC	**Annex II species that are a primary reason for selection of the site:** *Rhinolophus ferrumequinum* (Greater horseshoe bat) *Rhinolophus hipposideros* (Lesser horseshoe bat)	CO's are by SASSY. COs relevant to the SAC: To maintain, in favourable condition, habitats for the population of *Rhinolophus ferrumequinum* (Greater horseshoe bat), and *Rhinolophus hipposideros* (Lesser horseshoe bat). **Also contact CCW.**	Vulnerable to loss of foraging areas and roost disturbance due to increased development pressures; Expansion of urban fringe areas could reduce livestock farming and adversely affect foraging habitat.	no	Significant distance from B&NES - no indirect effects anticipated
Wye Valley Woodlands SAC	**Annex I habitats that are a primary reason for the selection of the site:** *Aspergo-fagetum* beech forests *Tilio-acerion* forests of slopes, screes and ravines *Taxus baccata* woods **Annex II species present as a qualifying feature, but not a primary reason for selection of this site:** *Rhinolophus hipposideros* (Lesser horseshoe bat)	CO's are by SASSY. COs relevant to the SAC: to maintain *Tilio-acerion* forests of slopes, screes and ravines; *Asperulo-Fagetum* beech forests and *Taxus baccata* woods in a favourable condition. And, to maintain in favourable condition habitats for the population of Lesser Horseshoe Bat (*Rhinolopus hipposiderous*). ***Also contact CCW.***	main vulnerability lack of and inappropriate management; potential increase in recreational pressures and habitat disturbance	no	Significant distance from B&NES - no indirect effects anticipated
Somerset Levels & Moors SPA and Ramsar	**This site qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I** Over winter: *Cygnus columbianus bewickii* (Bewick's swan) ***Plwvialis apricaria*** (Golden plover) **This site also qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory** Over winter: *Anas clypeata* (Shoveler) *Anas crecca* (Teal) *Anas penelope* (Wigeon) **Ramsar**		habitat loss and degradation from increased development, increased recreational pressures and any reduction in sympathetic farming activities; water abstraction; sea level change.		

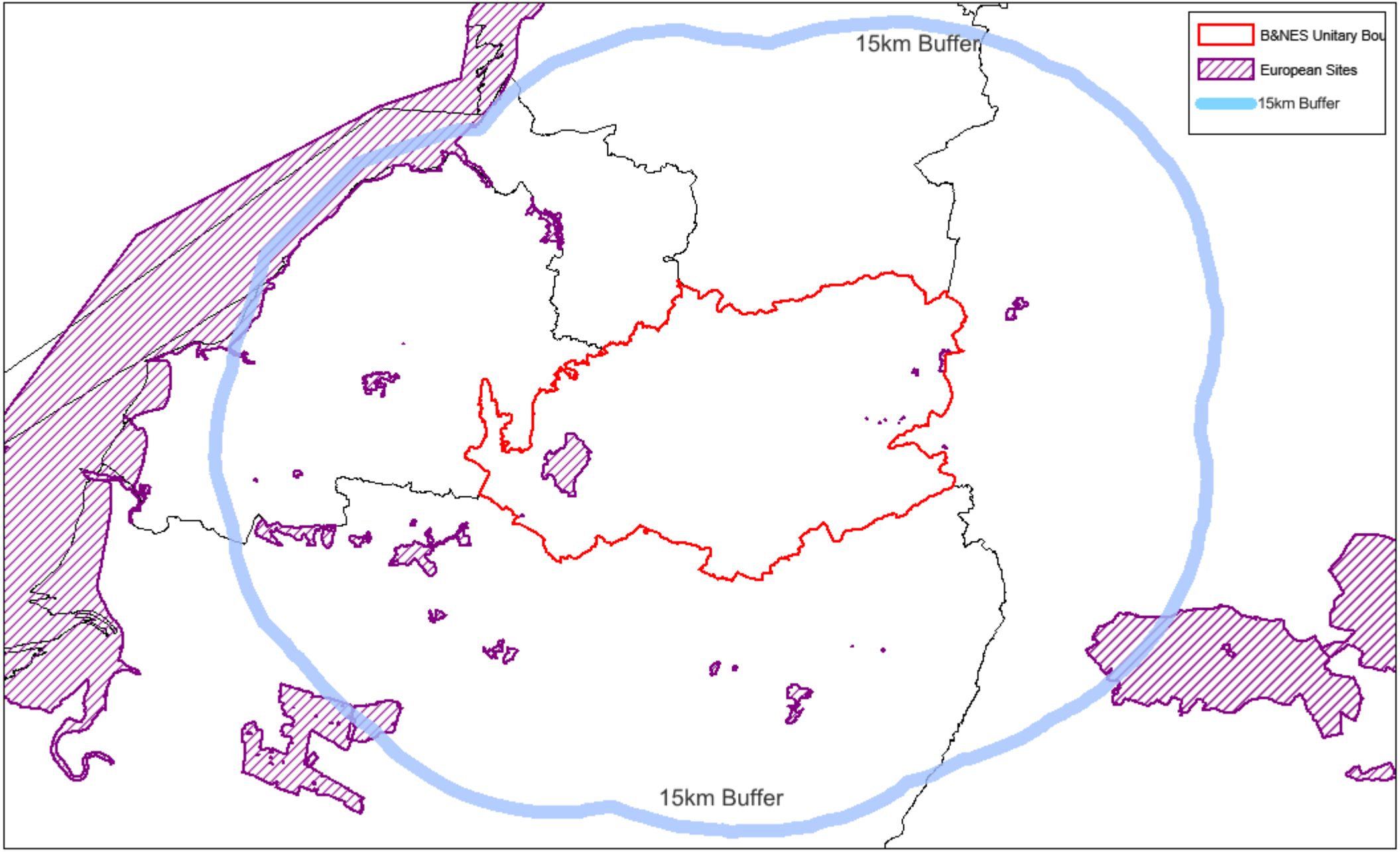
	Assemblage qualification: A wetland of international importance. The area qualifies under **Article 4.2** of the Directive (79/409/EEC) by regularly supporting at least 20,000 waterfowl			no	Significant distance from B&NES - no dircet or indirect effects anticipated
Salisbury Plain SPA	This site qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of During the breeding season; Stone Curlew Burhinus oedicnemus, 22 pairs representing at least 11.6% of the breeding population in Great Britain (Count as at 1998) Over winter; Hen Harrier Circus cyaneus, 14 individuals representing at least 1.9% of the wintering population in Great Britain (RSPB 1996/7)	**To maintain, in favourable condition, habitats for and the population of breeding Stone Curlew and over wintering Hen Harrier.**	Breeding Stone Curlew Burhinus oedicnemus and other birds are dependent upon the extensive areas of short grassland, and wintering birds forage over the grasslands and scrub. Raptors overwinter, feeding on small birds and mammals. These species would be vulnerbale to direct habitat loss and degradation of habitat qualities.	no	Significant distance (approx 12.5km) from B&NES - no direct or indirect effects anticipated
Salisbury Plain SAC	**Annex I habitats that are a primary reason for selection of this site** Juniperus communis formations on heaths or calcareous grasslands *Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites)* ***Annex II species that are a primary reason for selection of this site*** **1065 Marsh fritillary butterfly Euphydryas (Eurodryas, Hypodryas) aurinia**	Avoid the deterioration of the qualifying natural habitats and the habitats of qualifying species, and the significant disturbance of those qualifying species, ensuring the integrity of the site is maintained and the site makes a full contribution to achieving Favourable Conservation Status of each of the qualifying features.Subject to natural change, to maintain or restore: □ The extent and distribution of qualifying natural habitats and habitats of qualifying species; □ The structure and function (including typical species) of qualifying natural habitats and habitats of qualifying species; □ The supporting processes on which qualifying natural habitats and habitats of qualifying species rely; □ The populations of qualifying species; □ The distribution of qualifying species within the site.	Habitat disturbance and degradation from increased recreational pressure and dog walking, and would be vulnerable to a reduction in live stock farming thats sustains the habitat. Vulnerable to air pollution from increased nitrogen deposition and acidic dust deposition.	no	Significant distance (approx 12.5km) from B&NES - no direct or indirect effects anticipated

Map 1

European Sites within and adjacent to Bath & North East Somerset

Sites within 15km zone

Scale: 1:300,000



Documents List

The Conservation of Habitats and Species Regulations 2010
http://www.legislation.gov.uk/uksi/2010/490/pdfs/uksi_20100490_en.pdf

Bat Walkover Survey and Assessment Report - Land at Ensleigh and Weston (1.2 MB), Bat Pro Ltd (February 2013)
http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/InfoPapersandAppraisals/bat_habitat_assessment_report_-_ensleigh_draft_2013.pdf

Preliminary Ecological Surveys and Assessment - Weston, Bristol Regional Environmental Records Centre (July 2013)
http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Evidence-Base/Environment/ecological_surveys_2013_-_weston.pdf

Findings from July 2013 Dusk Bat Surveys At Land Adjoining Weston
http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Evidence-Base/Environment/dusk_bat_surveys_weston.pdf

Bath Urban Surveys - Dusk Bat Surveys for horseshoe bats around Weston, Bath - Surveys and Assessments Summer & Autumn 2013, Bat Pro (October 2013)
http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/CoreDocumentsnotsavedelsewhere/bath_urban_survey_weston_2013.pdf