

Colerne Neighbourhood Plan

Habitats Regulation Assessment

Colerne Neighbourhood Plan Group

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1. Introduction

Background to the Project

- 1.1. AECOM has been appointed by Colerne Neighbourhood Plan Group to assist in producing a report to inform Wiltshire Council's Habitats Regulations Assessment (HRA) of the potential effects of Colerne Neighbourhood Plan on the European and Ramsar sites. The objectives of the assessment are to:
- Identify any aspects of the Neighbourhood Plan that would cause an adverse effect on the integrity of Natura 2000 sites, otherwise known as European sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs), protected SPAs (pSPAs) and, as a matter of Government policy, Ramsar sites), either alone or in combination with other plans and projects; and
 - To advise on appropriate policy mechanisms for delivering mitigation where such effects were identified.
- 1.2. The HRA of the Colerne Neighbourhood Plan is required to determine if there are any realistic linking pathways present between a European site and the Neighbourhood Plan and where Likely Significant Effects cannot be screened out, an analysis to inform Appropriate Assessment to be undertaken to determine if adverse effects on the integrity of the European sites will occur as a result of the Neighbourhood Plan alone or in combination.

Legislation

- 1.3. The need for HRA is set out within the Conservation of Habitats & Species Regulations 2017 (as amended) (**Box 1**), and relates to protection of European sites.
- 1.4. European sites (also called Natura 2000 sites) can be defined as actual or proposed/candidate Special Areas of Conservation (SAC) or actual or potential Special Protection Areas (SPA). It is also Government policy for sites designated under the Convention on Wetlands of International Importance (Ramsar sites) to be treated as having equivalent status to Natura 2000 sites.

Box 1: The legislative basis for Appropriate Assessment

Conservation of Habitats and Species Regulations 2017 (as amended)

The Regulations state that:

"A competent authority, before deciding to ... give any consent for a plan or project which is likely to have a significant effect on a European site ... must make an appropriate assessment of the implications for the plan or project in view of that site's conservation objectives... 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."

- 1.5. It is therefore important to note that this report has two purposes:
- To assist the Qualifying Body (the Neighbourhood Plan Group) in preparing their plan by recommending (where necessary) any adjustments required to protect European sites, thus making it more likely their plan will be deemed compliant with the Conservation of Habitats and Species Regulations 2017 (as amended); and
 - On behalf of the Qualifying Body, to assist the Local Planning Authority to discharge their duty under Regulation 105 (in their role as 'plan-making authority' within the meaning of that regulation) and Regulation 106 (in their role as 'competent authority').
- 1.6. As 'competent authority', the legal responsibility for ensuring that a decision of 'likely significant effects' is made, for ensuring an 'appropriate assessment' (where required) is undertaken, and for ensuring Natural England are consulted, falls on the local planning authority. However, they are entitled to request from the Qualifying Body the necessary information on which to base their judgment and that is a key purpose of this report.

- 1.7. The Habitats Regulations applies the precautionary principle to Natura 2000 sites (SAC and SPA). As a matter of UK Government policy, Ramsar sites are given equivalent status. For the purposes of this assessment candidate SACs (cSACs), potential SPAs (pSPAs) and proposed Ramsar (pRamsar) sites are all treated as fully designated sites. In this report we use the term “European sites” to refer collectively to the sites listed in this paragraph.
- 1.8. Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. This contrasts with the SEA Regulations which does not prescribe how plan or programme proponents should respond to the findings of an environmental assessment; merely that the assessment findings (as documented in the ‘environmental report’) should be ‘taken into account’ during preparation of the plan or programme. In the case of the Habitats Regulations, plans and projects may still be permitted if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network.
- 1.9. In 2018, the ‘People Over Wind’ European Court of Justice (ECJ) ruling¹ determined that ‘mitigation’ (i.e. measures that are specifically introduced to avoid or reduce the harmful effects of a plan or project on European sites) should not be taken into account when forming a view on likely significant effects. Mitigation should instead only be considered at the appropriate assessment stage. Appropriate assessment is not a technical term: it simply means ‘an assessment that is appropriate’ for the plan or project in question. As such, the law purposely does not prescribe what it should consist of or how it should be presented; these are decisions to be made on a case by case basis by the competent authority. An amendment was made to the Neighbourhood Planning Regulations in late 2018 which permitted Neighbourhood Plans to be made if they required appropriate assessment.
- 1.10. Over the years the phrase ‘Habitats Regulations Assessment’ has come into wide currency to describe the overall process set out in the Conservation of Habitats and Species Regulations from screening through to Imperative Reasons of Overriding Public Interest (IROPI). This has arisen in order to distinguish the process from the individual stage described in the law as an ‘Appropriate Assessment’. Throughout this report we use the term Habitats Regulations Assessment for the overall process.

Report Layout

- 1.11. **Chapter 2** of this report explains the process by which the HRA has been carried out. **Chapter 3** explores the relevant pathways of impact. **Chapter 4** summarises the Test of Likely Significant Effects of the policies and site allocations of the Plan considered ‘alone’ and ‘in-combination. (The Test of Likely Significant Effects itself is undertaken in **Appendix C**). **Chapter 5** contains the Appropriate Assessment for any linking impact pathways that could not be screened out from potentially resulting in a Likely Significant Effect. **Chapter 6** contains the conclusion and a summary of recommendations.

¹ Case C-323/17

2. Methodology

Introduction

- 2.1. This section sets out the approach and methodology for undertaking the Habitats Regulations Assessment (HRA). HRA itself operates independently from the Planning Policy system, being a legal requirement of a discrete Statutory Instrument. Therefore, there is no direct relationship to the National Planning Policy Framework (NPPF) and the ‘Tests of Soundness’.

A Proportionate Assessment

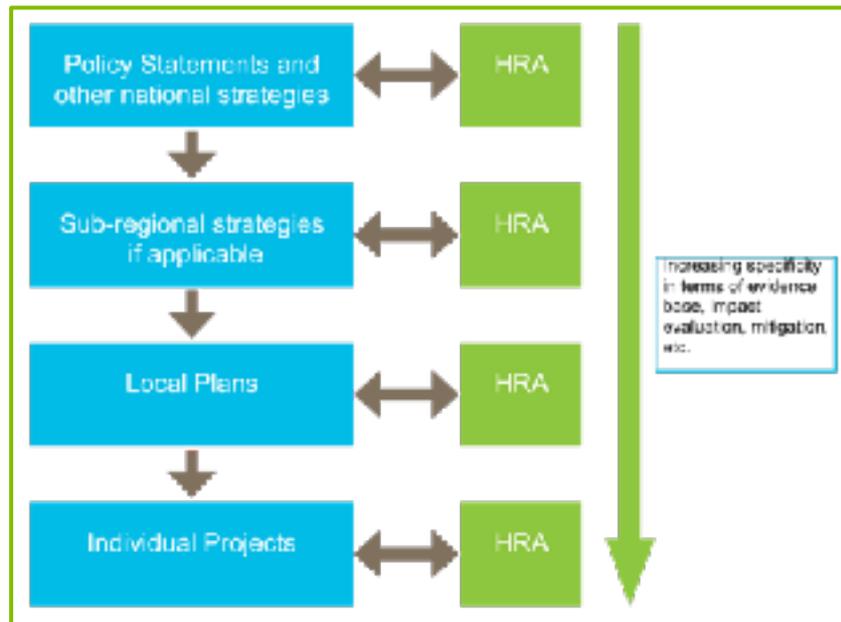
- 2.2. Project-related HRA often requires bespoke survey work and novel data generation in order to accurately determine the significance of effects. In other words, to look beyond the risk of an effect to a justified prediction of the actual likely effect and to the development of avoidance or mitigation measures.
- 2.3. However, the draft MHCLG guidance² (described in greater detail later in this chapter) makes it clear that when implementing HRA of land-use plans, the Appropriate Assessment (AA) should be undertaken at a level of detail that is appropriate and proportional to the level of detail provided within the plan itself:
- 2.4. *“The comprehensiveness of the [Appropriate] assessment work undertaken should be proportionate to the geographical scope of the option and the nature and extent of any effects identified. An AA need not be done in any more detail, or using more resources, than is useful for its purpose. It would be inappropriate and impracticable to assess the effects [of a strategic land use plan] in the degree of detail that would normally be required for the Environmental Impact Assessment (EIA) of a project.”*
- 2.5. More recently, the Court of Appeal³ ruled that providing the Council (competent authority) was duly satisfied that proposed mitigation could be “*achieved in practice*” then this would suffice to meet the requirements of the Habitat Regulations. This ruling has since been applied to a planning permission (rather than a Plan document)⁴. In this case the High Court ruled that for “*a multistage process, so long as there is sufficient information at any particular stage to enable the authority to be satisfied that the proposed mitigation can be achieved in practice it is not necessary for all matters concerning mitigation to be fully resolved before a decision maker is able to conclude that a development will satisfy the requirements of reg 61 of the Habitats Regulations*”.
- 2.6. In other words, there is a tacit acceptance that AA can be tiered and that all impacts are not necessarily appropriate for consideration to the same degree of detail at all tiers as illustrated in **Box 2**.

² MHCLG (2006) Planning for the Protection of European Sites, Consultation Paper

³ No Adastral New Town Ltd (NANT) v Suffolk Coastal District Council Court of Appeal, 17th February 2015

⁴ High Court case of R (Devon Wildlife Trust) v Teignbridge District Council, 28 July 2015

Box 2: Tiering in HRA of Land Use Plans



- 2.7. For a plan the level of detail concerning the developments that will be delivered is usually insufficient to make a highly detailed assessment of significance of effects. For example, precise and full determination of the impacts and significant effects of a new settlement will require extensive details concerning the design of the new housing sites, including layout of greenspace and type of development to be delivered in particular locations, yet these data will not be decided until subsequent stages.
- 2.8. The most robust and defensible approach to the absence of fine grain detail at this level is to make use of the precautionary principle. In other words, the plan is never given the benefit of the doubt (within the limits of reasonableness); it must be assumed that a policy/measure is likely to have an impact leading to a significant adverse effect upon an internationally designated site unless it can be clearly established otherwise.

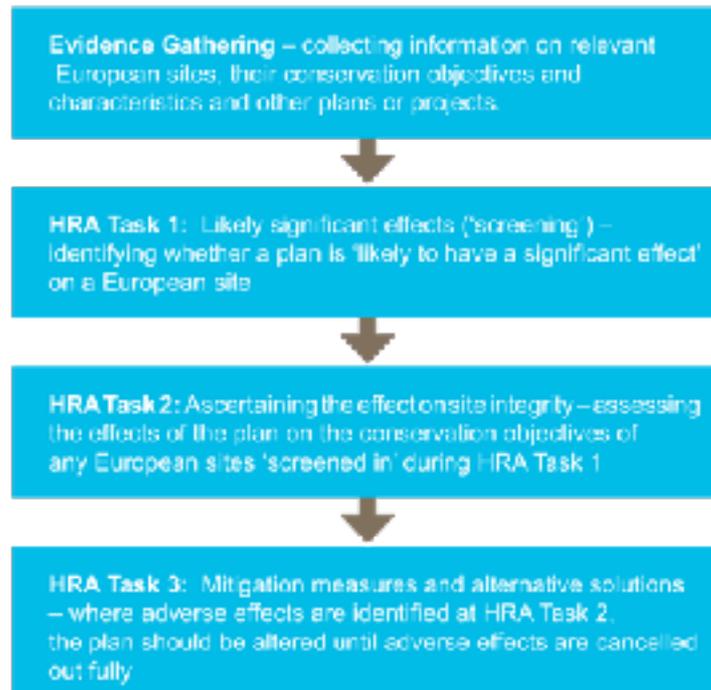
The Process of HRA

- 2.9. The HRA is being carried out in the continuing absence of formal central Government guidance. The former DCLG (now MHCLG) released a consultation paper on AA of Plans in 2006⁵. As yet, no further formal guidance has emerged from MHCLG on the assessment of plans. However, Natural England has produced its own informal internal guidance and central government have released general guidance on appropriate assessment⁶.
- 2.10. **Box 3** outlines the stages of HRA according to the draft MHCLG guidance (which, as government guidance applicable to English authorities is considered to take precedence over other sources of guidance). The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the plan until no likely significant effects remain.

⁵ MHCLG (2006) Planning for the Protection of European Sites, Consultation Paper

⁶ <https://www.gov.uk/guidance/appropriate-assessment>

Box 3: Four-Stage Approach to Habitats Regulations Assessment



2.11. The following process has been adopted for carrying out the subsequent stages of the HRA.

Task One: Test of Likely Significant Effect

- 2.12. The first stage of any Habitats Regulations Assessment is a test of Likely Significant Effect - essentially a high level assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:
- 2.13. *“Is the Plan, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites?”*
- 2.14. In evaluating significance, AECOM have relied on professional judgment and experience of working with the other local authorities on similar issues. The level of detail concerning developments that will be permitted under land use plans is rarely sufficient to make a detailed quantification of effects. Therefore, a precautionary approach has been taken (in the absence of more precise data) assuming as the default position that if a likely significant effect (LSE) cannot be confidently ruled out, then the assessment must be taken the next level of assessment Task Two: Appropriate Assessment. This is in line with the April 2018 court ruling relating to ‘People Over Wind’ where mitigation and avoidance measures are to be included at the next stage of assessment.

Task Two: Appropriate Assessment

- 2.15. European Site(s) which have been ‘screened in’ during the previous Task have a detailed assessment undertaken on the effect of the policies on the European site(s) site integrity. Avoidance and mitigation measures to avoid adverse significant effects are taken into account or recommended where necessary.
- 2.16. As established by case law, ‘appropriate assessment’ is not a technical term; it simply means whatever further assessment is necessary to confirm whether there would be adverse effects on the integrity of any European sites that have not been dismissed at screening. Since it is not a technical term it has no firmly established methodology except that it essentially involves repeating the analysis for the likely significant effects stage, but to a greater level of detail on a smaller number of policies and sites, this time with a view to determining if there would be adverse effects on integrity.

- 2.17. One of the key considerations during Appropriate Assessment is whether there is available mitigation that would entirely address the potential effect. In practice, the Appropriate Assessment takes any policies or allocations that could not be dismissed following the high-level Screening analysis and analyse the potential for an effect in more detail, with a view to concluding whether there would actually be an adverse effect on integrity (in other words, disruption of the coherent structure and function of the European site(s)).

The Scope

- 2.18. There is no guidance that dictates the physical scope of an HRA of a plan. Therefore, in considering the physical scope of the assessment we were guided primarily by the identified impact pathways rather than by arbitrary “zones”, i.e. a source-pathway-receptor approach. Current guidance suggests that the following European sites be included in the scope of assessment:

- All sites within the Neighbourhood Plan area boundary; and
- Other sites shown to be linked to development within the Neighbourhood Plan boundary through a known “pathway” (discussed below).

- 2.19. Briefly defined, pathways are routes by which a change in activity within the plan area can lead to an effect upon a European site. In terms of the second category of European site listed above, MHCLG guidance states that the AA should be “*proportionate to the geographical scope of the [plan policy]*” and that “*an AA need not be done in any more detail, or using more resources, than is useful for its purpose*” (MHCLG, 2006, p.6).

- 2.20. Locations of European designated sites are illustrated in **Appendix A, Figure A1**, and full details of all European designated sites discussed in this document can be found in **Appendix B**, specifying their qualifying features, conservation objectives and threats to integrity. Table 1 below lists all those European designated sites included in this HRA.

Note that the inclusion of a European sites or pathway below does not indicate that an effect is expected but rather that these are pathways that will be investigated.

Table 1: Physical Scope of the HRA

European Designated Site	Location	Reason for Inclusion (pressures/ threats associated with the European site that could link to the Plan.)	Other site vulnerabilities
Bath and Bradford on Avon Bats SAC	Closest component SSSI is approximately 700m south of the Neighbourhood Plan Area	<ul style="list-style-type: none"> - Recreational Pressure - Offsite habitat availability/ management (functionally linked land) - Planning permission general 	<ul style="list-style-type: none"> - Change in land management - Direct impact from third party - Feature location/ extent/ condition unknown - Change to site conditions - Inappropriate designation boundary

- 2.21. Planning permission: general, is a catch all term used when it is difficult to define a specific impact pathway upon an European Site. The aim of an HRA is to assess in a broad sense whether planning permission will cause an adverse impact upon European sites and this impact will therefore be discussed in general between the other relevant impact pathways to the Neighbourhood Plan and in this way the impact will be captured holistically.

The 'in Combination' Scope

- 2.22. It is a requirement of the Regulations that the impacts and effects of any land use plan being assessed are not considered in isolation but in combination with other plans and projects that may also be affecting the European designated site(s) in question.
- 2.23. When undertaking this part of the assessment it is essential to bear in mind the principal intention behind the legislation i.e. to ensure that those projects or plans which in themselves have minor impacts are not simply dismissed on that basis but are evaluated for any cumulative contribution they may make to an overall significant effect. In practice, in combination assessment is therefore of greatest relevance when the plan would otherwise be screened out because its individual contribution is inconsequential. The overall approach is to exclude the risk of there being unassessed likely significant effects in accordance with the precautionary principle. This was first established in the seminal Waddenzee⁷ case.
- 2.24. For the purposes of this HRA, we have determined that the key other documents with a potential for in-combination effects are the Adopted Wiltshire Core Strategy⁸ and its associated Chippenham Site Allocations Plan⁹. The Plan sets out the strategic vision for delivering sustainable growth over the period of up to 2026. The Authorities area covers approximately 3,255 km² and has a population of approximately 460,00 people. The strategy makes provision for at least 42,000 new dwellings in Wiltshire within the plan period.
- 2.25. Core Policy 11 sets out the Spatial Strategy for the Corsham Community Area of which Colerne is classed as a large Village. Over the plan period in the Corsham Community Area a total of 1,395 homes will be provided of which 1,220 should occur within Corsham and approximately 175 be split across the rest of the large and small villages within the Community Area.
- 2.26. Given the extent of development, both in terms of its volume and geographical distribution, that it proposes, the Wiltshire Core Strategy (and its HRAs) are the most important documents to consider assessing the in-combinations effects of the Colerne Neighbourhood Plan.
- 2.27. Wiltshire Council is currently undertaking a review of the Core Strategy in its Local Plan Review, however this is yet to be published, therefore the Neighbourhood Plan will have to be in general compliance with the overarching Core Strategy including Core Policy 50: Biodiversity and Geodiversity which specifically relates to protecting European sites and states:

“All development proposals shall incorporate measures to avoid and reduce disturbance to sensitive wildlife species and habitats throughout the lifetime of the development.

Any development potentially affecting a Natura 2000 site [European site] must provide avoidance measures in accordance with the strategic plans or guidance set out in paragraphs 6.75-6.77 [Of the Core Strategy], otherwise, bespoke measures must be provided to demonstrate that the proposals would have no adverse effect upon the Natura 2000 network. Any developments that would have an adverse effect on the integrity of a European nature conservation site will not be in accordance of the Core Strategy”

- 2.28. It should be noted that, while the broad potential impacts of the Wiltshire Core Strategy will be considered as part of the 'in combination' assessment, this document does not carry out a full HRA of this Plan. Instead it draws upon existing HRAs that have been carried out on the Plan.

⁷ Waddenzee case (Case C-127/02, [2004] ECR-I 7405)

⁸ Wiltshire Core Strategy (Adopted January 2015), Wiltshire Council. <http://www.wiltshire.gov.uk/planning-policy-core-strategy> [Accessed 08/07/2020]

⁹ Chippenham Site Allocations Plan (Adopted May 2017), Wiltshire Council <http://www.wiltshire.gov.uk/planning-policy-site-allocation-plan-chippenham> [Accessed 08/07/2020]

3. Impact Pathways

3.1. The following impact pathways are relevant to the Colerne Neighbourhood Plan:

- Loss of Functionally Linked Land; and,
- Recreational Pressure.

Table 2. Description of potential impact pathways from increased development to Bat and Bradford on Avon Bats SAC.

Impact pathway **Discussion**

Recreational pressure	Increased residential development can lead to increased visitor numbers to European Site, particularly those within relatively easy recreational access. Recreational pressure to each European Site is individual and varied, for example, the nature, scale, timing and duration of some human activities can result in the disturbance of bats at a level that may substantially affect their behaviour, and consequently affect the long-term viability of the population. A distance of 5km is frequently used to record those European Sites that are susceptible to recreational pressure. However, for the Bath and Bradford on Avon Bats SAC there are extensive mitigation strategies that have been development to protect roosting and, where possible, foraging habitat of rare bat species. The Trowbridge Bat Mitigation Strategy SPD for Bath and Bradford on Avon Bats SAC (adopted February 2020) provides tailored recreational pressure zones of impact which are discussed further in the assessments below.
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Loss of functionally linked habitat While most European sites have been geographically defined to encompass the key features that are necessary for coherence of their structure and function, and the support of their qualifying features, this is not always the case. A diverse array of qualifying species including birds, bats and amphibians are not confined to the boundary of designated sites.

For example, the highly mobile nature of both wildfowl and heathland birds implies that areas of habitat of crucial importance to the maintenance of their populations are outside the physical limits of European sites. Despite not being part of the formal designation, this habitat is still integral to the maintenance of the structure and function of the interest feature on the designated site and, therefore, land use plans that may affect such areas should be subject to further assessment. Examples of other mobile qualifying species are great-crested newts and bats.

Box Mines SSSI component of the Bath and Bradford on Avon Bats SAC is only 700m from the boundary of the Parish. The countryside of Colerne is likely to support bat habitat that is functionally linked to Bath and Bradford on Avon Bats SAC. Bechstein's *Myotis bechsteinii* and greater horseshoe *Rhinolophus ferrumequinum* bats, features of these SACs, are not expected to be confined to the boundaries of European Sites and are anticipated to forage within the wider vicinity of their Core Sustenance Zone (CSZ).

For Bechstein's it is reasonable to assume that the core foraging areas around each component SSSI of the SAC, is likely to be within c.1km of each site boundary.

For greater horseshoe it is reasonable to assume that the core foraging area is around each SAC, is likely to be within c.3-4km of each site boundary. For the purposes of the Trowbridge Bat Mitigation Strategy a distance of 4km has been used.

There is a risk that development could fragment supporting habitats and prevent bats from using functional links to important roosting, breeding and hibernating sites supported by the SACs. Simply described, habitat fragmentation is the division of an expanse of habitat into smaller, individual patches that are isolated from each other by the removal of the original habitat. The following impact pathways from inappropriate development have been identified in the Trowbridge Bat Mitigation Strategy SPD:

- a. **Habitat degradation** - alteration / demolition / removal of a potential roost feature including changes to environmental conditions (temperature, humidity, internal light levels etc); loss, damage or change of management of potential foraging habitat; or removal / fragmentation / modification of habitats in a potential commuting corridor;
- b. **Lighting** – increased artificial lighting affecting potential roosting, foraging and commuting features;
- c. **Noise and vibration** – construction / demolition activities close to potential roost features;
- d. **Recreational disturbance** – increasing the risk of recreational visits, both organised and informal. This can result in impacts such as: trampling of vegetation, leading to changes in species composition, loss of vegetation and erosion; disturbance from the presence of people and their activities; 'general' urban effects: dumping of waste, damage, vandalism, fires; and spread of plants including alien species.
- e. **Pollution** – dust and fumes close to potential roost features; and
- f. **Mortality** – e.g. predation by domestic cats at roost entrances, collision risk from road traffic and wind turbines.

Again, Trowbridge Bat Mitigation Strategy SPD for Bath and Bradford on Avon Bats SAC has produced tailored impact zones for SAC features with regards to loss of supporting habitat, this is discussed further in the assessment below.

4. Test of Likely Significant Effects

Introduction

- 4.1. The initial scoping of impact pathways and relevant European sites identified the following requires consideration with regards to Bath and Bradford on Avon Bats SAC:
 - Functionally linked land; and,
 - Recreational pressure.
- 4.2. The policies contained within the Colerne Neighbourhood Plan were therefore screened for their potential of Likely Significant Effects (LSEs) on European sites. The full results of the LSEs Test for the Colerne Neighbourhood Plan are presented in Appendix C.
- 4.3. The sites that have been considered within this test of likely significance are shown below:
 - Thickwood Field (0.4 ha) – Allocated site (5 dwellings)
 - Constitutional Club (0,1 ha) – Allocated site (5 dwellings)
 - The Drill Ground (c. 3.5 ha) – Non-allocated site
 - Slaughterford Mill (c 4.65 ha) – Non-allocated site.
- 4.4. Although the Drill Ground and Slaughterford Mill are not allocated within this iteration of the Neighbourhood Plan they are mentioned in **Policy BEP5** with regards to future potential allocations to satisfy the remaining need of the LPA housing requirement within the area. Therefore, their potential impacts are considered to inform any future proposals for developing those sites.

Functionally Linked Land

- 4.5. As has been established within the table above, greater horseshoe bats forage approximately 4km from their roosts and this has been used as a measure to define the distance at which an area may be considered functionally linked land the “Core Area”. Although all four sites within the Neighbourhood Plan are within or partially within 4km of a SSSI component of the SAC, the allocated site **known as** The Constitutional Club and the non-allocated site **known as** The Drill Ground and are both brownfield sites with limited ecological features and therefore can be screened out as being **significant areas of functionally linked habitat** for the SAC population.
- 4.6. The two remaining sites - the allocated site Thickwood Field and the non-allocated site Slaughterford Mill - both have features of potential interest for foraging and commuting bats and are within, or partially within, 4km of a component SSSI of the SAC. In addition to this both are within or partially within the 1.5km lesser horseshoe Core Area (1.5km from Core Roost).
- 4.7. It appears also that the non-allocated development site Slaughterford Mill is a Core Roost site for lesser horseshoe bats (Wiltshire Council, 2015)¹⁰ and regularly supports over 100 breeding lesser horseshoe bats.
- 4.8. **There is thus** the potential for likely significant effects upon the SAC with regards to development at these sites and as such these sites cannot be dismissed at the screening stage.
- 4.9. Thickwood Field and Slaughterford Mill **are** discussed further with regards to functionally linked land in the Appropriate Assessment.
- 4.10. The sites will be assessed for adverse impact both ‘alone’ and in-combination with other plans and projects.

¹⁰ Wiltshire Council, 2015. Bat Special Area of Conservation (SAC) Planning Guidance for Wiltshire. <http://www.wiltshire.gov.uk/bat-special-areas-of-conservation-planning-guidance-for-wiltshire.pdf> [Accessed 09/08/2020]

Recreational Pressure

- 4.11. Much work has already been undertaken with regards to the Bath and Bradford on Avon Bat SAC in other areas of Wiltshire and Bath for example with regards to Trowbridge, which have produced a Bat Mitigation Strategy SPD for the SAC. Within this SPD sensitivity zones have been used to define where a likely significant effect may occur on the SAC population. Although Trowbridge Parish is approximately 10km south of Colerne Parish the principles for the sensitivity zones around the SACs are still valid for all component SSSIs.
- 4.12. The boundary of the Neighbourhood Plan Area is only 700m north of Box Mine SSSI component. Within the Trowbridge SPD¹¹ it identifies a 'Red' or high-risk buffer at 600m around woodlands containing core roosts and a 'Yellow' or medium risk buffer at 1.5km for Bechstein's bat, 2km for lesser horseshoe bat and 4km for greater horseshoe bat. Core roosts are defined within the Wiltshire Council (2015) Bat SAC Planning Guidance as breeding or wintering roosts containing 50+ adult greater horseshoe bats, breeding roosts containing 100+ or winter roosts containing 50+ adult lesser horseshoe bats and any transitional roosts for Bechstein's bats.
- 4.13. Box Mine SSSI is a wintering and transitional roost for all three species and according to the SSSI citation a maximum of 250 greater horseshoes hibernate within the mine each winter. Therefore, the recreational sensitivity zone relevant to this component SSSI would be 4km from the SAC boundary. The lesser horseshoe breeding roost (100+ bats) at Slaughterford Mill (a Core Roost) also has a 2km recreational sensitivity zone around it. The SPD goes on to mention that this zone is relevant to development at new greenfield sites and as such excludes urban areas as defined by settlement boundaries.
- 4.14. All four of the allocated and non-allocated sites are within or partially within this 4km sensitivity zone and therefore all could potentially have a likely significant effect upon the SAC. All four sites will be discussed within the Appropriate Assessment.
- 4.15. The current iteration of the Neighbourhood Plan is allocating a total of 10 dwellings (Thickwood Field and The Constitutional Club). The Local Plan puts the housing need of the local area at a total of 100 dwellings. However, suitable sites within MOD land (The Drill Ground) are yet to be released and therefore are not being bought forward within this iteration of the Neighbourhood Plan, as described in Policy BEP5. Even considering the total number of dwellings the area requires (100 dwellings) this is a small number of dwellings and therefore unlikely to increase recreational pressure beyond current manageable levels by itself, especially given only 10 will be bought forward in the short term. Given the small number of dwellings, likely significant effects can be screened out alone. However, an 'in combination' effect cannot be dismissed. Therefore, these sites will be assessed for adverse effects in combination with other plans and projects.

¹¹ <http://www.wiltshire.gov.uk/whsap-draft-trowbridge-bat-mitigation-strategy-spd.pdf> [Accessed 09/08/2020]

5. Appropriate Assessment

‘Alone’ Assessment

Loss of Functionally Linked Land

5.1. The screening for likely significant effects identified the following development sites within the plan that require Appropriate Assessment regarding the impact pathway loss of functionally linked land:

- Thickwood Field Development (Allocated in Policy BEP4 for 5 dwellings)
- Slaughterford Mill Development (Non-allocated but associated with Policy BEP5)

5.2. Any development on greenfield sites that result in the loss of existing mature vegetation lines or riverbank corridors has the potential to affect the commuting and foraging routes of bats for which the SAC is designated. While the direct loss of habitat is the most relevant, development proposals might also render habitats and flight lines unsuitable through light and sound pollution.

5.3. Loss of functionally linked land with regards to bat Core Roost and Core Areas are an amalgamation of several categories of effects which include:

- Physical changes – alteration / demolition / removal of a potential roost feature including environmental conditions (temperature, humidity, internal light levels etc), loss, damage or change of management of potential foraging habitat, removal / fragmentation / modification of habitats in a potential commuting corridor;
- Lighting – artificial lighting close to potential roosting, foraging and commuting features;
- Noise and vibration – construction / demolition activities close to potential roost features (potentially temporary – depending on type of development);
- Recreational disturbance – increasing the risk of recreational visits both organised and informal (discussed as a separate impact in the ‘in-combination’ assessment)
- Pollution – dust and fumes close to potential roost features (potentially temporary dependent on development); and
- Mortality – predation by domestic cats at roost entrances, collision risk from wind turbines.

5.4. The overarching Wiltshire Core Strategy provides protection to European sites which is included in Core Policy 50: Biodiversity and Geodiversity. The Policy states:

*“Development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term. Where it has been demonstrated that such features cannot be retained, removal or damage shall only be acceptable in circumstances where the anticipated ecological impacts have been mitigated as far as possible and appropriate compensatory measures can be secured to ensure no net loss of the local biodiversity resource, and secure the integrity of local ecological networks and provision of ecosystem services. All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development. **Any development potentially affecting a Natura 2000 site [European Site] must provide avoidance measures in accordance with the strategic plans or guidance set out in paragraphs 6.75-6.77 [of the Core Strategy] where possible, otherwise bespoke measures must be provided to demonstrate that the proposals would have no adverse effect upon the Natura 2000 network. Any development that would have an adverse effect on the integrity of a European nature conservation site will not be in accordance with the Core Strategy.**”*

5.5. The Core Strategy with regards to the Bradford on Avon Area Strategy also goes on to say “All development will be required to maintain the integrity of the Bath and Bradford on Avon Bats Special Area of Conservation, having particular regard to the Wiltshire Bats SAC Guidance”

- 5.6. The Bat Special Area of Conservation (SAC) Planning Guidance for Wiltshire. (Wiltshire Council, 2015) referred to in the Wiltshire Core Strategy guides planners and developers on how development should be conducted with regards to development pertaining to Core Areas of the Bath and Bradford on Avon Bats SAC with regards to the impacts listed in paragraph 5.3.
- 5.7. The Council's guidance document should be used at the earliest stages of development proposals to determine whether there will be an impact. The guidance can be used to inform at the very beginning; site selection, scheme design, project timescales and budgets.
- 5.8. The guidance requires development that is likely to have any of the above impacts within a Core Area to employ a licenced ecologist to carry out surveys following good practice guidelines and where survey work confirms a sensitive feature used by species of the SAC is likely to be affected, a mitigation strategy will be required to be produced. The surveys and mitigation strategy will be required to be submitted within the developments planning application. In addition to this, each development brought forward will also require a project level Habitats Regulations Assessment.
- 5.9. A Core Roost for lesser horseshoe bats (Wiltshire Council, 2015)¹² regularly supporting over 100 breeding lesser horseshoe bats is listed to be at or within the immediate vicinity of the Slaughterford Mill site. Although this site is not allocated within this iteration of the Neighbourhood Plan it should be carefully considered as to whether the site should be included as an allocated site in the future revisions. As the roost is regarded as a Core Roost any impact to it through development could harm the integrity of the SAC which is likely to render this site unsuitable for development in the long term.
- 5.10. It is recommended that a Paragraph be added to Policy NEP1: Landscape and Natural Environment stating that development will be only be supported where the development can demonstrate compliance with the Bat Special Area of Conservation (SAC) Planning Guidance for Wiltshire (2015) or any subsequent update, and where the development will not adversely effect any European site or Core Roosts and sensitive features within the Core Areas which are regarded as functionally linked to the European sites. All development brought forward within areas regarded as Core Areas within the Planning Guidance for Wiltshire (2015) will be required to produce a project level Habitats Regulations Assessment to determine the developments impact upon the integrity of the Bath and Bradford on Avon Bat SAC.**
- 5.11. With this policy wording in place it can be concluded that the impact pathway functionally linked land would not adversely affect the integrity of the Bath and Bradford on Avon Bats SAC, since the Slaughterhouse Mill site is not an actual allocation in the plan.

'In-combination' Assessment

Functionally Linked Land

- 5.12. Although a site's individual contribution to the loss of functionally linked land may be small, when looked at, at a landscape scale each small contribution can build to create a much larger impact and therefore must be looked at in-combination with other plans and projects.
- 5.13. The main plan with which the Neighbourhood Plan should be considered in combination with is Wiltshire Core Strategy (adopted 2015) as well as the current Bath and North Somerset Core Strategy (adopted 2014).
- 5.14. As highlighted in the Alone Assessment, Wiltshire Core Strategy provides an overarching policy which sets out that development proposals must provide evidence that there will be no impact to the integrity of European Sites.
- 5.15. Similarly, the Bath and Somerset Local Plan also has a policy (Policy CP6: Environmental Quality) which states:

¹² Wiltshire Council, 2015. Bat Special Area of Conservation (SAC) Planning Guidance for Wiltshire. <http://www.wiltshire.gov.uk/bat-special-areas-of-conservation-planning-guidance-for-wiltshire.pdf> [Accessed 9/08/2020]

“New Development will protect and enhance international, national and local sites and existing networks of valued habitats; facilitate migration and dispersal through the natural and built environment; and seek to reduce fragmentation of existing habitats”

5.16. Policy NE3 also goes on to state:

“Development that would adversely affect, directly or indirectly, internationally or nationally protected species and/or their habitats will not be permitted”

5.17. Both the Wiltshire Core Strategy and the Bath and North Somerset Core Strategy would have undergone Habitats Regulations Assessments themselves. The conclusions of the Wiltshire Core Strategy Habitats Regulations Assessment (March 2013)¹³ concludes that the policies and measures presented within the Core Strategy were sufficient to conclude no adverse effects on the integrity of any individual European site, or the network of European sites, either alone or in-combination with other plans and projects. The Bath and North Somerset HRA was deemed to have been iterative, precautionary and robust and involved regular liaison and guidance from Natural England and bat experts and concluded that using a precautionary approach and taking into account all mitigation measures proposed, no likely significant effects were likely to occur.

5.18. In addition to the conclusions of the HRA of these two overarching local plans within which the SAC is located. Other areas also have guidance on development for the SAC including Mendip District Council. The Mendip District Council Guidance for Development¹⁴ sets out consultation zones within which sensitive features of the SAC and functionally linked to the SAC have the potential to be impacted and highlights the requirement for surveys, stakeholder consultation and mitigation where impacts are likely to ensure no adverse effect upon the SAC with regards to development within the District.

5.19. It can be concluded that the Colerne Neighbourhood Plan will not adversely affect the integrity of the Bath and Bradford on Avon Bats SAC either alone or in-combination with other plans and projects. This conclusion is based on the conclusions of the HRAs of the overarching Local Plans and the presence of robust guidance for ensuring no adverse impact upon the integrity of the SAC through development within Wiltshire and the surrounding Districts. The conclusions are further strengthened within the Neighbourhood Plan by the inclusion of a paragraph into Policy NEP1: Landscape and Natural Environment. The paragraph will ensure that development will only be supported where it can demonstrate compliance with the Bat Special Area of Conservation (SAC) Planning Guidance for Wiltshire (2015) or any subsequent update and where the development will not adversely affect the integrity of any European site or Core Roosts and sensitive features within the Core Areas which are regarded as functionally linked to the European sites.

Recreational Pressure

5.20. Although the number of currently allocated dwellings in the Neighbourhood Plan is very low (10 dwellings), these dwellings are will contribute to recreational pressure in-combination with other dwellings bought forward within the core recreation zone of the SAC. Wiltshire Core Strategy (adopted 2015) makes provision for at least 42,000 dwellings within the County.

5.21. Increased residential development within the core recreational zone (usually defined as 5km) around the boundary of a European site has the potential to increase the number of visitors utilising the European site for recreational purposes. An increase in recreational pressure has the potential to cause adverse impact to the European site.

5.22. As discussed in Table 2, recreational pressure to each European Site is individual and varied, for example, the nature, scale, timing and duration of some human activities can result in the disturbance of bats at a level that may substantially affect their behaviour, and consequently affect the long-term viability

¹³ <http://www.wiltshire.gov.uk/corestrategydocument?directory=Sustainability%20Appraisal%20and%20Habitat%20Regulation%20Assessment&filerref=24> [Accessed 10/08/20]

¹⁴ https://www.mendip.gov.uk/media/22423/Bats-Technical-Guidance-Mendip-District-SAC-Bats-v1-2/pdf/Bats_-_Technical_Guidance_Mendip_District_SAC_Bats_v1.2.pdf?m=636990601307100000 [Accessed 11/08/20]

of the population¹⁵. As bats are a highly mobile species and utilise sites outside of the boundaries of the SAC at different times of the year, recreational effects can also occur outside of the SAC in relation to features that are functionally linked to the SAC e.g. recreational pressure in woodlands that are not designated as SACs themselves but are functionally linked to an SAC by its Bechstein's bat maternity colonies during the summer.

5.23. Looking at effects in-combination effects, other areas have also put together mitigation strategies including Trowbridge.

5.24. Trowbridge Bat Mitigation Strategy SPD which was prepared in support of the Draft Wiltshire Housing Sites Allocation Plan (Feb 2019) has used sensitivity risk zones to highlight the areas outside of the SAC where recreational pressure could adversely affect sensitive features functionally linked to the SAC in the Trowbridge area. The recreational pressure zones within Trowbridge were determined through visitor surveys conducted by Footprint Ecology (2018)¹⁶ and through a literature review of Bechstein's bat ecology. These zones are discussed below:

- Red Zone – High Risk – Impacts will arise as a result of recreational pressure on woodlands used by breeding Bechstein's bats. Loss of habitat of critical importance to supporting breeding Bechstein's bats. Impacts will arise from developments considered alone and/or in-combination with other plans and projects.
- Yellow Zone – Medium Risk – Impacts will arise on individual sites and in-combination with other development as a result of loss and/or degradation of habitat of importance to Bechstein's bat, greater horseshoe, and lesser horseshoe bats for foraging, commuting and roosting including:
 - Buildings
 - Grassland
 - Hedgerow
 - Trees
 - Scrub
 - Water bodies
 - Riparian corridors
 - Availability/access to roosts
- Grey Hatched Zone – Medium Risk – Impacts will arise in-combination as a result of recreational pressure on woodlands used by Bechstein's bats.

5.25. The SPD goes on to discuss the implications for development in the relevant zones;

- Red Zone – It is unlikely that development in this zone will be able to provide sufficient mitigation to enable an assessment under the Habitats Regulations to conclude, beyond reasonable scientific doubt, no adverse effect on the integrity of the SAC.
- Yellow Zone – Development on greenfield sites outside of the settlement boundaries will be able to demonstrate no adverse effect on site integrity of the SAC provided that:
 - 100% mitigation is provided for habitat loss within the allocation boundary.
 - Retained bat habitat remains connected to the wider habitat network and is adequately buffered in accordance with this strategy
 - Bat habitat remains relatively undisturbed by the effects of urbanisation in accordance with this strategy
 - A financial contribution is made towards funding the LPA scheme in Appendix 1 [of the Strategy] for mitigating residual in-combination effects from loss/degradation of bat habitat.

¹⁵ Speakman, J.R, Webb, P.I and Racey, P.A (1991). Effects of disturbance on energy expenditure of hibernating bats. *Journal of applied Ecology*. 28, 1087-1104.

¹⁶ Panter, C., Lake, S. & Liley D. (2018). Trowbridge Visitor Survey and Recreation Management Strategy. Unpublished report by Footprint Ecology for Wiltshire Council.

- Grey Hatched Zone – Residential development will be able to demonstrate no adverse effect on site integrity of the SAC provided that:
 - Funding being collected via CIL towards the LPA scheme in Appendix 2 [of the Strategy] for mitigating residual in-combination effects from recreational pressure.
- 5.26. The Trowbridge SPD is based on the Wilshire Bats Development Guidance document previously discussed and therefore must comply also with the overarching policy within the Wiltshire Core Strategy which states:
- “Any development potentially affecting a Natura 2000 site [i.e. European Site] must provide avoidance measures in accordance with the strategic plans or guidance set out in paragraphs 6.75-6.77 [of the Core Strategy] where possible, otherwise bespoke measures must be provided to demonstrate that the proposals would have no adverse effect upon the Natura 2000 network. Any development that would have an adverse effect on the integrity of a European nature conservation site will not be in accordance with the Core Strategy.”*
- 5.27. Therefore, with the overarching Wiltshire Core Strategy Policy and the Trowbridge SPD as well as the Guidance on Development in place, any development coming forward within the Plan period within the Trowbridge area can be concluded have no impact upon the integrity of the SAC. As the Local Plan has also undergone an HRA which concluded no adverse effects upon the integrity of the Bath and Bradford on Avon Bats SAC it can be concluded that recreational pressure associated with the Neighbourhood Plan will not adversely affect the integrity of the Bath and Bradford on Avon Bats SAC either alone or in-combination with other plans and projects.

6. Conclusions and Recommendations

- 6.1. This HRA assessment identified the relevant European sites linking to the Colerne Neighbourhood Plan and undertook the screening of the Plan's policies. The European site that was considered due to being located within 10km of the Colerne Parish boundary and potentially being linked to the Plan was:
- Bath and Bradford on Avon Bats SAC
- 6.2. The following impacts were considered in the HRA:
- Loss of functionally linked land
 - Recreational pressure.
- 6.3. Both impacts were screened in at the screening stage and were discussed within the Appropriate Assessment. The following paragraphs summarise the significant findings of the HRA.

Loss of Functionally Linked Land

- 6.4. The screening for likely significant effects identified the following development sites within the plan that require Appropriate Assessment regarding the impact pathway loss of functionally linked land due to both **having** features of potential interest for foraging and commuting bats and **being** within or partially within 4km of a component SSSI of the SAC (greater horse shoe foraging distance buffer). In addition to this both are within or partially within **the** 1.5km lesser horseshoe Core Area (1.5km from Core Roost);
- Thickwood Field Development (Allocated **under Policy BEP6 for 5 dwellings**)
 - Slaughterford Mill Development (Non-allocated **but referenced in Policy BEP5**)
- 6.5. A Core Roost for lesser horseshoe bats (Wiltshire Council, 2015)¹⁷ regularly supporting over 100 breeding bats is also listed to be at, or within the immediate vicinity of, the Slaughterford Mill site. Although this site is not allocated within this Neighbourhood Plan it should be carefully considered as to whether the site should be included as an allocated site in the future. As the roost is regarded as a Core Roost any impact to it through development could harm the integrity of the SAC and it is considered likely to be unsuitable for development in the long-term. **Therefore, it is advised against being brought forwards as an allocation site in future iterations of the Neighbourhood Plan unless clear evidence is provided by the site promotor that the redevelopment can be accomplished without affecting the roost.**
- 6.6. Development at the Allocated site Thickwood Field could cause adverse effects; however, the overarching Wiltshire Core Strategy provides protection to European sites through Core Policy 50: Biodiversity and Geodiversity. However, currently the Neighbourhood plan does not detail any protection for European sites against development.
- 6.7. Therefore, **in an earlier version of this report it was** recommended that a Paragraph be added to Policy NEP1: Landscape and Natural Environment stating that development will be only be supported where the development can demonstrate compliance with the Bat Special Area of Conservation (SAC) Planning Guidance for Wiltshire (2015) or any subsequent update, and where the development will not adversely affect any European site or Core Roosts and sensitive features within the Core Areas which are regarded as functionally linked to the European sites. All development brought forward within areas regarded as Core Areas within the Planning Guidance for Wiltshire (2015) will be required to produce a project level Habitats Regulations Assessment to determine the developments impact upon the integrity of the Bath and Bradford on Avon Bat SAC. **This addition has now been undertaken.**
- 6.8. **In addition, the Policy for this allocated site (BEP4: Housing Allocations) states that 'An assessment of potential impacts on bats, following the latest best practice guidelines, must be submitted with any application in line with the recommendations of the Habitat Assessment associated with this Plan'.**
- 6.9. With regards to the in-combination assessment, the Neighbourhood Plan **must** be **compliant** with the overarching Wiltshire Core Strategy. Areas outside of Wiltshire including Bath and North Somerset District

¹⁷ Wiltshire Council, 2015. Bat Special Area of Conservation (SAC) Planning Guidance for Wiltshire. <http://www.wiltshire.gov.uk/bat-special-areas-of-conservation-planning-guidance-for-wiltshire.pdf> [Accessed 9/08/2020]

also have Core Strategy policies designed to protect the Bath and Bradford on Avon Bats SAC. Both of these Core Strategies have gone through Habitat Regulations Assessments and were concluded not to have an adverse effect upon the integrity of any European sites either alone or in-combination with other plans and projects and therefore, it is considered that the addition of the wording within paragraph 6.7 above to the Neighbourhood Plan Policy NEP1: Landscape and Natural Environment is sufficient to conclude that the Neighbourhood Plan will not have an adverse effect upon the integrity of the Bath and Bradford on Avon Bats SAC either alone or in-combination with other plans and projects with regards to the loss of functionally linked land.

Recreational Pressure

- 6.10. The current number of dwellings allocated within the Neighbourhood Plan is very low (10 dwellings), these dwellings are to fill the immediate need of the Neighbourhood Area and to fill the need of the Core Strategy/ Emerging Local Plan further sites may be released at a later stage of the plan period. As the current number of dwellings is so low, the impact pathway recreational pressure could be screened out of the 'alone' assessment but was assessed in-combination with other plans and projects.
- 6.11. Increased residential development within the core recreational zone (usually defined as 5km) around the boundary of a European site has the potential to increase numbers of visitors utilising the European site for recreational purposes and therefore has the potential to cause an adverse impact. However, as bats are a highly mobile species not all recreational pressure can be accounted for within the SAC itself. Areas outside of the SAC which are linked functionally e.g. woodlands that are not designated as SACs themselves but are linked to a SAC population by its maternity colonies during the summer.
- 6.12. In order to ensure recreational pressure is covered outside of the SAC as well as within, prescriptive recreational mitigation strategies have been created by areas such as Trowbridge. Research and visitor surveys within the Trowbridge area have allowed the creation of sensitivity zones around known woodlands with Bechstein's bat maternity colonies. Each sensitivity zone has a specific level of avoidance or mitigation that is required to ensure no adverse effect upon the SAC through its functionally linked populations. This mitigation strategy is based on the guidance with the Wiltshire Bat Guidance for Development document which was produced along site the Wiltshire Core Strategy to ensure that no adverse effects on the integrity of the Bath and Bradford on Avon Bats SAC occurred through the increase of at least 42,000 dwellings over the Plan period of the Wiltshire Core Strategy.
- 6.13. As areas outside of the Neighbourhood Plan Area have robust mitigation strategies for their contribution to recreational pressure upon the Bath and Bradford on Avon Bats SAC, which are overarched by the protective policies within the Wiltshire Core Strategy that would also apply to new development within Colerne Parish where necessary, it is considered that the aforementioned addition of the wording within paragraph 6.7 above to the Neighbourhood Plan Policy NEP1: Landscape and Natural Environment is sufficient to conclude that the Neighbourhood Plan has a sufficient policy framework in place to ensure that adverse effect upon the integrity of the Bath and Bradford on Avon Bats SAC will not arise with regards to recreational pressure either alone or in-combination with other plans and projects.

A. Designated Sites Background

Bath and Bradford on Avon Bats SAC

Introduction

6.14. The SAC as a whole supports 15% of the UK population of Greater Horseshoe bats *Rhinolophus ferrumequinum*, internationally-significant populations of Lesser Horseshoe *Rhinolophus hipposideros* and Bechstein's bats *Myotis bechsteinii*. The SAC comprises four component sites: Brown's Folly, Box Mine, Winsley Mines, and Combe Down and Bathampton Down Mines. These are distributed over a wide geographical area to the south and east of Bath and have different known bat usages, which over the whole of the SAC include breeding, hibernation, swarming and dispersal. The sites are all abandoned limestone mines, and some include areas of supporting habitat: broadleaved woodland and species rich calcareous grassland. The surrounding landscape provides feeding and commuting opportunities between the component SSSIs, other SAC sites and other undesignated roosts which is vital in supporting the bats throughout their life cycle. Features of significance within the wider landscape are watercourses, woodland, grazed pasture, hay meadows, hedgerows, linear trees and scrub.

Conservation Objectives¹⁸

- 6.15. With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;
- 6.16. 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 the habitats of qualifying species
 - The structure and function of the habitats of qualifying species
 - The supporting processes on which the habitats of qualifying species rely
 - The populations of qualifying species, and,
 - The distribution of qualifying species within the site.

Qualifying Features¹⁹

- 6.17. Annex II species that are a primary reason for selection of this site:
- 1304 Greater horseshoe bat *Rhinolophus ferrumequinum* – This site in southern England includes the hibernation sites associated with 15% of the UK greater horseshoe bat population and is selected on the basis of the importance of this exceptionally large overwintering population.
 - 1323 Bechstein's bat *Myotis bechsteinii* – small numbers of Bechstein's bat have been recorded hibernating in abandoned mines in this area, though maternity sites remain unknown.
- 6.18. Annex II species present as a qualifying feature, but not a primary reason for site selection:
- 1303 Lesser horseshoe bat *Rhinolophus hipposideros*.

¹⁸ <http://publications.naturalengland.org.uk/publication/6279810384920576> [Accessed 07/07/2020]

¹⁹ <https://sac.jncc.gov.uk/site/UK0012584> [Accessed 07/07/2020]

Environmental Vulnerabilities²⁰

6.19. Natural England's Site Improvement Plan identifies the following threats and pressures on the integrity of the Bath and Bradford on Avon Bats SAC:

- Planning permission general
- Change in land management
- Direct impact from third party
- Feature location/ extent/ condition unknown
- Offsite habitat availability/ management
- Public access/ disturbance
- Change to site conditions
- Inappropriate designation boundary

²⁰ <http://publications.naturalengland.org.uk/publication/4564119772463104> [Accessed 07/07/2020]

B.Policy Screening

Policy	Description	HRA Implications
<p>Policy BEP1: Character and Design</p>	<p>Development proposals will be supported where their designs are in compliance with the relevant guidance in the Design Statement and show a congruence with or enhancement of their surroundings in terms of the built form, height, materials, historic character and boundary treatments.</p> <p>Applicants are required to demonstrate compliance with the Design Statement by submitting a Design Compliance Statement with any planning application.</p>	<p>No Likely Significant Effects.</p> <p>The policy regards design elements of the proposals. This policy does not allocate a quantum of development.</p> <p>No likely significant effects are expected from this policy.</p>
<p>Policy BEP2: Heritage</p>	<p>a. Planning applications for the demolition or development of, or substantial alterations to, the buildings or structures listed in the Historic Environment Record, or those identified in the Design Statement, will be expected to show that priority has been given to the retention of distinctive and important features.</p> <p>b. Applications must also demonstrate that there are no negative impacts on the setting and surrounds of any feature(s) or indicate measures to mitigate any such impacts.</p> <p>c. Where appropriate, Heritage Impact Assessments will be required to accompany applications.</p>	<p>No Likely Significant Effects</p> <p>The policy regards the retention of distinctive and important features on heritage assets within the Parish. This policy does not allocate a quantum of development.</p> <p>No likely significant effects are expected from this policy.</p>
<p>Policy BEP3: Housing</p>	<p>i. Development must demonstrate how it meets residents' revealed preferences for small scale developments capable of offering a mix of different dwelling type.</p> <p>ii. The mix of house types within any development must demonstrate how it responds to local needs across a broad range, including provision for an ageing population (disability and 'downsizers'), units for younger people and first-time buyers, financially-assisted homes and properties designed to accommodate home-working and those moving up the property ladder.</p> <p>iii. When Local Plan policy requires affordable housing, developers should offer affordability through one of the following routes:</p> <ul style="list-style-type: none"> • social housing (Local Authority rental); • Housing Association; • shared equity; • a Community Land Trust. <p>iv. The design and character of development must demonstrably satisfy the principles of the Character and Design Statement.</p> <p>v. In line with the NPPF, where there is developable brownfield land, or a reasonable prospect thereof in the Plan timeframe, brownfield development will be supportable and greenfield development opposed.</p>	<p>No Likely Significant Effects.</p> <p>The policy regards the mix of dwelling type offered within small scale developments and offering affordable homes where Local Plan policy requires.</p> <p>No likely significant effects are expected from this policy.</p>

**Policy BEP4
Housing
Allocations:
Thickwood Field
(0.4ha)**

Development of around 5 houses to meet identified local housing needs in accordance with all relevant policies in the Colerne Neighbourhood Plan. In particular:

- Delivery of the development to be led by a community-led initiative such as a Community Co-operative Custom and Self-Build.
- Vehicular access to be from the C151, retaining the current TPO tree line which borders the road.
- Development within the site to be outside the drip-line of the TPO trees.
- Parking to Wiltshire Highways standards to be provided on site.
- The boundary wall to the northeast to be retained.
- Design, materials and layout character to be congruent with and sensitive to the neighbouring Thickwood estate houses (see CDS).
- Attention to be given to sustainable drainage.
- Any street lighting to ensure no prejudice to the Plan's dark skies policy and no detrimental impact on neighbouring properties.
- Development proposal to offer contribution to a Thickwood play area.
- An assessment of potential impacts on bats, following the latest best practice guidelines, must be submitted with any application in line with the recommendations of the Habitat Assessment associated with this Plan (see NEP1).
- Heritage implications related to the Lucknam Park estate to be addressed and if required supported by a heritage assessment, within the contingency that although the main building of Lucknam Park and some outbuildings are listed, the grounds are not, and the listed buildings are some 300m from the site perimeter wall
-

Potential Likely Significant Effects

This policy allocates 5 dwellings on a site.

Potential pathways include:

- Recreational pressure.
- Functionally linked land (3.4 km from Box Mine SSSI)

<p>BEP4 Housing Allocations: Constitutional Club (0.1ha)</p> <p>Development of around 5 affordable houses/apartments to meet identified local housing needs in accordance with all relevant policies in the Colerne Neighbourhood Plan. In particular:</p> <ul style="list-style-type: none"> • Delivery of the development to be by a Colerne Community Led Housing project or by a local social housing provider. • Vehicular access to be from the High Street. • Parking to be provided on site to Wiltshire Highways standards. • Design character to be consistent with that of the Colerne Conservation Area (see the CDS). • Particular attention should be paid to the avoidance of overlooking to adjacent properties. • A Heritage Impact Assessment will be necessary in relation to the nearby listed buildings and the general Conservation Area context. • An assessment of potential impacts on bats, following the latest best practice guidelines, must be submitted with any application in line with the recommendations of the Habitat Assessment associated with this Plan (see NEP1) • 	<p>Potential Likely Significant Effects</p> <p>This policy allocates 5 dwellings on a site.</p> <p>Potential pathways include:</p> <ul style="list-style-type: none"> - Recreational pressure
<p>Policy BEP5: Meeting Longer-Term Housing Demand</p> <p>In line with NPPF policy [paras 117, 137(a), NPPF 2018] for brownfield preference, this Plan sets out as Policy that full delivery of the Longer-Term Housing Need should be met in due course by the announced intention to release for development MoD sites from the former Colerne Airfield/ Barracks.</p> <p>As described in more detail in Section 6 i below, there would be strong Plan and community support for re-development of the 'Drill Ground' (also locally known as the 'Parade Ground'). This area would provide adequate land for the defined demand, as well as delivering certain social benefits as described elsewhere in this Plan.</p>	<p>Potential Likely Significant Effects.</p> <p>This policy references the two sites assessed below, neither of which are allocated within the Neighbourhood Plan but both of which is potential for the site to be released in future to cover the remaining capacity of the local need up to the end of the Local Plan period.</p> <p>Potential pathways include:</p> <ul style="list-style-type: none"> - Recreational pressure - Functionally linked land (Slaughterford Mill is 3.9 km from Box Mine SSSI)

Supported Sites (Non-Allocated) – The Drill Ground (3.5ha)

The development of this large site, along with the two allocated earlier, could provide capacity for all conceivable local needs for the period to 2036, and possibly including future exogenous demands from Local Plan Review. Also, as discussed earlier, development of this area could affect desirable social integration across the Pinewood-Redwood estates. It should be designed to incorporate social facilities (green spaces, play-areas, arboriculture/natural environment, even a sports complex).

Although currently owned by the MoD the site is outside the security fence of the military site, is already publicly accessible, and is brownfield. The site cannot presently be allocated because of practical restrictions regarding infrastructure and supply which are currently serviced from within the MoD secure site, and because of the MoD's current policy not to consider the site separately from the whole Azimghur Barracks site. If these limitations could be addressed, this site would be immediately allocatable and would form an attractive development proposition for the purposes of this Plan.

Only the eastern part would be developed for housing -- around 2 hectares. The area in the western part would be used for community facilities – green spaces, play areas, arboricultural/natural environment, sports facilities. This development would also create opportunity for an off-road pedestrian and cycle path helping to link the several housing areas of North Colerne to Colerne village.

Potential Likely Significant Effects

This site is not allocated within the Neighbourhood Plan currently there is potential for the site to be released by the MOD in future to cover the remaining capacity of the local need up to the end of the Local Plan period.

Potential pathways include:

- Recreational pressure

Supported Sites (Non-Allocated) – Slaughterford Mill (1.8ha)

This site, submitted in the Call for Sites, is available. Although administratively within the parish of Colerne, it is socially part of the hamlet of Slaughterford and the parish of Biddestone.

Its development is supportable in principle on the basis of the current owners' present vision and intentions, and the following criteria:

- New units to consist of a mix of residential, live-work, and small commercial units, plus surrounding amenity landscaping.
- Overall development volume (number of additional units) to be limited in accordance with the extremely restricted vehicular access through the hamlet of Slaughterford.
- Parts of the site are within Flood Zone 3, which development plans must address.
- Development plans must show how the site's industrial heritage has been professionally assessed and will be protected and featured.
- In view of its location, any development proposal must be acceptable to Biddestone Parish Council.

However, as part of it is within Flood Zone 3, before this site can be allocated or taken forward evidence is required to show that any parts proposed for development pass the Sequential Test and, if necessary, the Exception Test for flooding.

Potential Likely Significant Effects

This site is not allocated within the Neighbourhood Plan currently the site is available and potentially supportable by the parish council should they wish to take this site forward.

Potential pathways include:

- Recreational pressure
- Functionally linked land (3.9 km from Box Mine SSSI)

<p>Policy BEP6: Sustainable Design and Construction</p>	<p>a. Colerne Parish will support development and infrastructure proposals that contribute to the Wiltshire-wide target of becoming carbon neutral by 2030 and strongly encourages developers to positively address issues relating to climate change.</p> <p>b. Any new development in the Parish should aim to meet a high level of sustainability in both design and construction and be optimised for energy efficiency.</p> <p>c. Encouragement will be given to applications which include sustainable design and construction approaches in advance of national standards in force at that time.</p>	<p>No Likely Significant Effects.</p> <p>The policy regards the support of the Parish in contributing to sustainable design and construction in the County and contributing to carbon neutrality and positively addressing climate change issues.</p> <p>No likely significant effects are expected from this policy.</p>
<p>Policy BEP7: Infill and Backland Development</p>	<p>1. Infill and backland development will be supported for small-scale developments, or schemes such as studios or workshops, subject to the following criteria:</p> <p>a. The designs comply with the relevant guidance in the <i>Character and Design Statement</i>, with particular care needed for proposals within the Conservation Area'</p> <p>b. The proposals do not impose on neighbouring properties (e.g. in terms of overshadowing, overlooking or loss of sunlight or daylight).</p> <p>c. The layout will provide for safe access, waste storage, adequate parking space and a garden area for ground-floor homes in flatted developments.</p> <p>2. If proposed, conversion to studios or workshops of buildings (sheds, barns etc.) that are within the gardens of existing buildings will be supported if it can be demonstrated that there are no negative service access, noise or social impacts.</p>	<p>No Likely Significant Effects</p> <p>The policy is a design management policy regarding design criteria for infill and back garden development. The policy does not allocate a quantum of development.</p> <p>No likely significant effects are expected from this policy.</p>
<p>Policy BEP8: Custom and Self-build Policy</p>	<p>Self-build and custom-build housing development proposals will be supported where they:</p> <p>a. Offer clear evidence that the initial owner of the home will have primary input into its final design and layout.</p> <p>b. Represent an initiative driven by local individual or group needs.</p> <p>c. Complement the scale and pace of medium-term development in the parish.</p> <p>d. The designs comply with the relevant guidance in the Design Statement.</p>	<p>No Likely Significant Effects.</p> <p>The policy is a design management policy regarding support from the Parish where design criteria for self and custom build homes are adhered to. This policy does not allocate a quantum of development.</p> <p>No likely significant effects are expected from this policy.</p>
<p>Policy BEP9: Permeable Surfacing</p>	<p>1. Development proposals will not be supportable unless they:</p> <p>a. Incorporate permeable surfaces for driveways and hardstanding areas in excess of 5 m².</p> <p>b. Mitigate roof water run-off by the provision of on-site storage, for example, by means of water-butts, soakaways or rain gardens.</p> <p>2. New commercial and public parking areas should provide permeable surfaces.</p>	<p>No Likely Significant Effects.</p> <p>This policy regards the support of developments by the Parish if permeable surfaces are used within developments. This policy does not allocate a quantum of development.</p> <p>No likely significant effects are expected from this policy.</p>
<p>Policy BEP10: Design for Home Working</p>	<p>Developments and designs that provide space and telecommunications infrastructure to facilitate home working will be encouraged if in line with all other Plan policies</p>	<p>No Likely Significant Effects.</p> <p>This policy regards the encouraging home working.</p> <p>No likely significant effects are expected from this policy.</p>

<p>Policy BEP11: Sustainable Land Preparation and Contamination Control</p> <p>This policy is relevant to the demolition, alteration, extension or refurbishment of existing buildings on ex-MoD sites within the parish and to new developments thereon. Proposals should comply with the following requirements:</p> <ol style="list-style-type: none"> a. At the planning stage, a scoping exercise will be carried out to identify the likely contaminants to be encountered at the proposed site. b. On full application, evidence should be provided to demonstrate that any potential contamination of the site has been fully investigated and any remediation found to be necessary has been satisfactorily planned prior to commencing construction work. c. At site clearance and ground preparation stages, measures will be taken to identify or confirm the type and nature of any contamination that is revealed. d. Appropriate remediation measures will be agreed with the local planning and environmental authorities. e. Contaminated material to be removed from the site will be securely contained during excavation or demolition and for transport off the site and will be subject to secure disposal procedures. f. Proposed on-site containment and off-site disposal of identified contaminants will meet the requirements of current environmental legislation. 	<p>No Likely Significant Effects.</p> <p>This policy is environmentally positive requiring remediation of contamination.</p> <p>No likely significant effects are expected from this policy.</p>
<p>Policy NEP1: Landscape and Natural Environment</p> <p>Future development must maintain adequate open landscape space, rural and agricultural in character, between Colerne and other settlements in the Parish so that the landscape continues to provide overall character and context of the Parish.</p> <p>Development will only be supported where it can demonstrate compliance with the Bat Special Area of Conservation (SAC) Planning Guidance for Wiltshire (2015) or any subsequent update, and where it will not adversely affect any European site or Core Roosts and sensitive features within the Core Areas which are regarded as functionally linked to European sites. All development brought forward within Core Areas shall produce a project-level Habitats Regulations Assessment of the development's impact on the integrity of the Bath and Bradford-on-Avon Bat SAC.</p>	<p>No Likely Significant Effects.</p> <p>This policy is to protect landscape character within the Parish.</p> <p>It was recommended in an earlier version of this HRA that a paragraph on protecting European sites is added to this policy, as set out in the main text recommendations. This has now been added.</p>

<p>Policy NEP2: Green Infrastructure and Biodiversity</p>	<p>a. Development proposals will be expected to demonstrate the provision of a net gain in biodiversity through enhancement and creation of ecological networks within and, where possible, beyond the site. Net gain is an approach that uses the planning process to protect and enhance biodiversity. As per NPPF para 174(b), plans should:</p> <ul style="list-style-type: none"> i. identify, map and safeguard ... local wildlife-rich habitats and wider ecological networks; ... wildlife corridors and stepping-stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; ii. promote the conservation, restoration and enhancement of priority habitats, ecological networks; ...the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity. <p>b. Proposals should demonstrate what consideration has been given to a range of factors as relevant, including but not limited to:</p> <ul style="list-style-type: none"> i. Maintaining and improving the quality of existing green infrastructure, including local networks and corridors, specifically to increase value as a recreation asset and as a habitat for biodiversity; ii. measures to reduce damage/disturbance to surrounding wildlife and green corridors and watercourses during the demolition/construction process; iii. demonstrating how existing green areas and trees will be protected; iv. respecting and accommodating the essential systems constituted by the numerous aquifers that flow down from the wolds into the Box valley and the By Brook River, feeding springs and watercourses; v. County Wildlife Sites and designated areas of Site of Special Scientific Interest as shown on <p>c. Development proposals shall also demonstrate that the mitigation hierarchy has been followed sequentially in accordance with the principles of: i. Avoid; ii. Reduce, moderate, minimise; iii. Rescue e.g. translocation; iv. Repair, reinstate, restore, compensate or offset.</p>	<p>No Likely Significant Effects.</p> <p>This policy is to ensure developments demonstrate the provision of biodiversity net gain and protecting and enhancing green infrastructure within the Parish.</p> <p>No likely significant effects are expected from this policy</p>
<p>Policy NEP3: Local Green Spaces</p>	<p>The plan proposes that the green spaces as shown on Map XX and listed in the Local Green Spaces Report be designated as Local Green Spaces in accordance with the provision of paragraph 99 of the National Planning Policy Framework.</p>	<p>No Likely Significant Effects.</p> <p>This policy regards the safeguarding of local green spaces.</p> <p>No likely significant effects are expected from this policy.</p>
<p>Policy NEP4: Key Views</p>	<p>g. The seven key views identified in the Key Views report must be maintained and protected and any development must avoid any significant adverse impact.</p> <p>h. Planning applications proposing development which is of a scale that could impact on any Key Views must demonstrate how the proposal enhances and protects the character of the parish given its setting within the Cotswolds Area of Outstanding Natural Beauty.</p>	<p>No Likely Significant Effects.</p> <p>This policy regards safeguarding key views throughout the parish.</p> <p>No likely significant effects are expected from this policy.</p>

<p>Policy EBP1: Sustaining Existing Employment</p>	<ol style="list-style-type: none"> 1. The loss of land and buildings currently used for employment purposes will not be permitted <ol style="list-style-type: none"> a. unless evidence is produced to show that the redevelopment for alternative employment use is not possible, and b. the land and/or the buildings shall be genuinely marketed to local markets on reasonable terms for employment use, for at least 6 months, and have remained unsold or unlet and no reasonable offer has been refused. Full details of marketing must accompany any development proposal. 2. The development of land and buildings already used for employment purposes will be supported, subject to the proposal meeting 1a. above, where the proposal: <ol style="list-style-type: none"> a. supports the more effective and efficient use of the site as employment land; b. results in no loss in full-time-equivalent jobs; c. is supported by a plan which demonstrates the need for additional space for the business to grow; and d. complies with the Policy EBP2. 	<p>No Likely Significant Effects.</p> <p>This policy regards safeguarding employment land for employment. This policy does not allocate a quantum of development.</p> <p>No likely significant effects are expected from this policy.</p>
<p>Policy EBP2: Encouraging New Employment</p>	<p>The establishment of small-scale employment enterprises on existing sites or on new sites will be supported if:</p> <ol style="list-style-type: none"> a. they do not reduce the quality or quantity of employment opportunities offered b. they provide adequate access and car parking, and do not create traffic flow problems or generate traffic inappropriate to country roads c. the proposals are compatible with the uses of surrounding buildings d. there is no significant adverse impact on residential amenity e. they are compatible with the Design Statement. 	<p>No Likely Significant Effects.</p> <p>This policy is a development management policy regarding criteria for where small scale employment will be supported. This policy does not allocate a quantum of development.</p> <p>No likely significant effects are expected from this policy.</p>
<p>Policy CP1: Traffic and Transport</p>	<p>All developments that will generate significant amounts of movement should be required to provide a travel plan, as per Wiltshire Core Policy 62, and this should show how specific local factors will be addressed. These being: the constrained highway access to Colerne parish; the formal and practical HGV access limitations; the paucity of public transport services to and through the parish; inadequacy in cycle/pedestrian/wheelchair/buggy mobility in the parish.</p>	<p>No Likely Significant Effects.</p> <p>This policy regards the requirement for all developments to provide a travel plan in line with Wiltshire Core Policy 62.</p> <p>No likely significant effects are expected from this policy.</p>
<p>Policy CP2: Walking and Cycling</p>	<ol style="list-style-type: none"> a. In line with Wiltshire Core Policy 63, developments that have a Transport strategy advocating new and improved networks of routes for pedestrians and cyclists will be supported. In particular where they increase accessibility to all, including wheelchair users and mobility scooters. b. Where public footpaths or cycleways are newly routed or re-routed, their routing should be sympathetic to landscape and wildlife corridors. c. Applications for developments that are adjacent to Public Rights of Way should, where appropriate, ensure that links are provided to those routes. 	<p>No Likely Significant Effects.</p> <p>This policy regards enhancing walking and cycling routes and ensuring they are sympathetic to green infrastructure corridors and the landscape.</p> <p>No likely significant effects are expected from this policy.</p>

<p>Policy SEP1: Renewable Energy</p> <p>1. Localised Renewable Energy Generation Proposals for individual and community scale energy from solar photovoltaic panels, or other forms of renewable generation, will be supported subject to the following criteria:</p> <ol style="list-style-type: none"> i. the proposed installation does not create an unacceptable impact on the amenities of local residents; ii. the proposed installation does not have an unacceptable impact on a feature of natural or biodiversity importance iii. or a significant impact on the visual landscape; iv. the scale of installation is appropriate for local needs or is grid-connected in v. ways that do not infringe conditions (i)-(iii) above; vi. the installation does not place unacceptable load upon Colerne's limited access vii. roads. <p>2. Support will be given to renewable generation developments that:</p> <ol style="list-style-type: none"> i. are led by, or meet the needs of the local community; and ii. have regard to the wider benefits of providing energy from renewable sources, and the potential effects on the local environment. 	<p>No Likely Significant Effects.</p> <p>This policy is a development management policy regarding criteria where development will be supported. This policy does not allocate a quantum of development. Some types of renewable energy can have significant effects on bats through barotrauma (regarding wind turbines) or direct habitat loss. However, this policy explicitly states that support will not be given where the proposed installation has an unacceptable impact on a feature of natural or biodiversity importance.</p> <p>No likely significant effects are expected from this policy.</p>
<p>Policy SEP2: Electrical Charging Points</p> <ol style="list-style-type: none"> a. All new houses where dedicated parking per house is provided must have an appropriately located charging point. Where general parking areas are included in housing developments, there should be at least one charging point available for general use. b. Planning applications for non-residential developments are encouraged to provide electric charging points for staff and / or other users. c. Significant extensions (40% or more increase in floor area) must have made a diligent application for grant funding to assist the installation of an on-site charging point where feasible. d. All existing public buildings with vehicular access and public parking areas are encouraged to install electric car charging areas. 	<p>No Likely Significant Effects.</p> <p>This policy regards ensuing electrical charging points are installed within new developments.</p> <p>No likely significant effects are expected from this policy.</p>
<p>Policy SEP3: Dark Skies and Street Lighting</p> <p>Development proposals must demonstrate that all opportunities to reduce light pollution have been taken and must ensure that the measured and observed sky quality in the surrounding area is not negatively affected. Proposals for artificial lighting will be supported where:</p> <ol style="list-style-type: none"> a. they would not give rise to an unacceptable level of illumination into the sky, open countryside, or in the village; b. it can be demonstrated that additional lighting on site will have no detrimental impact on visual and residential amenity, the historic environment or local ecology; c. any adverse impact of lighting proposals in all new development, including light spill and energy use, is minimised through design or technological solutions or by controlling the hours of use; d. there is a need for lighting due to safety in low lit or dark public areas; e. Where possible, streetlights shall be switched off during the deepest hours of the night, leaving only those necessary on safety grounds, e.g. at road junctions.; f. Any development proposals that will lead to a significant increase in light pollution will be opposed. 	<p>No Likely Significant Effects.</p> <p>This policy regards safeguarding dark sky areas, reducing light pollution within the Parish.</p> <p>No likely significant effects are expected from this policy.</p>

<p>Policy CWBP1: Protection and Enhancement of Community Facilities</p> <p>Current community facilities serving the whole parish include:</p> <ul style="list-style-type: none"> ● Allotments [CWBP3] ● Anglican church and Evangelical chapel ● Children's play areas [CWBP4] ● Football and Rugby Clubs and Recreation Ground ● GP Surgeries ● Hotel and Spa ● Old School Play Group and nursery/childcare ● Parish Rooms and Community Café ● Post Office, hairdressers and stores ● Primary School ● Two public houses and three clubs ● Sports Hall and swimming pool (MoD owned, open for civilian club use) ● Village Hall and Scouts HQ <ol style="list-style-type: none"> 1. Proposals that would result in the loss of an existing community facility will not be supported unless one or more of the following factors apply: <ol style="list-style-type: none"> a. There is no longer a demonstrable need or demand for the community facility concerned b. The existing community facility can be demonstrated no longer to be economically viable c. The proposal makes alternative provision for a facility still needed that would otherwise be lost, in an appropriate and convenient location elsewhere in the Plan area, and the proposed alternative provision complies with other policies in this Plan. d. It can be shown that all options for continuing community use have been exhausted. 2. Developments will be supported where they can demonstrate an enhancement of a community facility, including enhanced access and links to the community. 	<p>No Likely Significant Effects.</p> <p>This policy is development management policy safeguarding community facilities and will not support development unless a set of criteria are achieved.</p> <p>No likely significant effects are expected from this policy</p>
<p>Policy CWBP2: Promoting Additional Community Facilities</p> <ol style="list-style-type: none"> 1. Proposals for new or enhanced community facilities will be supported where development: <ol style="list-style-type: none"> a. meets the Neighbourhood Plan Character and Design criteria b. meets a demonstrable need and or demand c. will not result in unacceptable impacts on local residential amenity and is of a scale appropriate to the locality d. Is conveniently accessible for residents of the parish to walk or cycle. 	<p>No Likely Significant Effects.</p> <p>This policy is a development management policy which regards criteria where new facilities will be supported.</p> <p>No Likely significant effects are expected from this policy</p>
<p>Policy CWBP3: Allotments Provision</p> <p>Existing allotments should be retained unless equivalent or improved provision is delivered as near as possible to the site where allotments are lost. The provision of new allotments will be supported.</p>	<p>No Likely Significant Effects.</p> <p>This policy regards the safeguarding of allotments and the support of new allotments.</p> <p>No likely significant effects are expected from this policy.</p>
<p>Policy CWBP4: Children's Play Areas</p> <p>Developments of 10 or more dwellings must provide children's play areas within the scheme or contribute to the existing play areas (including improvements to access).</p>	<p>No Likely Significant Effects.</p> <p>This policy regards ensuring children's play areas are included within development design for developments of 10 or more dwellings.</p> <p>No likely significant effects are expected from this policy.</p>
<p>Policy CWBP5: Principles of Infrastructure Phasing and Priorities</p> <ol style="list-style-type: none"> 1. All new housing and employment proposals will be expected to contribute towards local infrastructure in proportion to their scale and in accordance with national and Wiltshire Core Strategy policies. 2. Housing developers must consider, assess and address their infrastructure requirements, and plan any related programmes of work so as to ensure that infrastructure keeps pace with the needs of the community. 	<p>No Likely Significant Effects</p> <p>This policy does not deliver development but sets out the requirements to be placed upon developers</p>

Policy PAP1: Pre-application Procedures In order to ensure positive and structured pre-application engagement, potential applicants submitting development proposals are expected to follow the Colerne Pre-Application Community Involvement Protocol, as included in this Neighbourhood Plan, and as adopted by Colerne Parish Council in February 2020.

No Likely Significant Effects.

This policy is regarding protocols for pre-applications.

No likely significant effects are expected from this policy.

