

Environmental Statement

Appendix 8.2: Habitat Regulations Assessment

Gundrys Farm Caravan Park

On behalf of Royale Parks (Dorset) Limited

March 2026



Gundry's Farm, Three-Legged Cross, Verwood, East Dorset

Habitat Regulations Assessment

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HABITAT REGULATIONS ASSESSMENT

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Figure 1: Location of Designated Sites with 10km of the Site

1 Introduction

- 1.1.1 The need for an Appropriate Assessment is set out in Article 6(3) of the Habitats Directive and interpreted into British law by Regulation 63 of the Conservation of Species and Habitats Regulations (2017) (Table 1.1).

Table 1.1 Legislative Basis for a Habitats Regulations Assessment.

The legislative basis for Habitat Regulations Assessment		
Habitats Directive	Article 6(3)	Any plan or project not directly connected with or necessary to the management of a Special Protection Area (SPA) or Special Area of Conservation (SAC) but likely to have a significant effect thereon, either individually or in-combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives.
Habitats Regulations	Regulation 63	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 shall make an appropriate assessment of the implications for the site in view of that sites conservation objectives.
1.1.2	The Habitats Directive applies the precautionary principle to relevant designated areas, in so much as plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of a SPA or SAC, collectively termed Natura 2000 sites.	
1.1.3	Under Government advice, Proposed SPAs (pSPA) and Proposed SACs (pSAC) should also be treated as having protection under the Habitats Regulations.	
1.1.4	It is Government policy (as outlined in Section 176 of the National Planning Policy Framework) for sites designated under the Convention on Wetlands of International Importance (Ramsar sites) to be treated as having equivalent status to Natura 2000 sites. As such, information to inform an Appropriate Assessment needs to cover features of any relevant Ramsar site.	
1.1.5	In undertaking an assessment, competent authorities (in this case the appropriate Secretary of State) must have regard to both direct and indirect effects on an interest feature of the Natura 2000 site, as well as cumulative effects. This may include consideration of features and issues outside the boundary of a Natura 2000 site.	
1.1.6	Plans and projects for which it is not possible to conclude that there would be no adverse effect on the integrity of Natura 2000 sites may still be permitted if there are no alternatives 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.	

2 Scope and Objectives

- 2.1.1 Whilst it is the responsibility of the competent authority to determine whether it can be concluded there is no adverse effect, it is the responsibility of applicants to submit sufficient information to enable such a determination to be made.
- 2.1.2 The purpose of this report is therefore to collate and provide sufficient information to enable the Local Authority to undertake a Habitats Regulations Assessment (HRA) of the potential effects of the Proposed Development on the Natura 2000 network. It provides sufficient standalone information, with references to other more detailed sections where necessary, for the Local Authority to be able to make an informed decision on the potential effects of the proposed development on Natura 2000 sites.
- 2.1.3 The following sites should be included in the scope of a HRA:
- All Natura 2000 sites shown to be linked to the proposed development through a known 'pathway'.
- 2.1.4 No Natura 2000 sites or Ramsar sites lie wholly or partly within the boundary of the area covered by the application boundary. The locations of the Natura 2000 sites in relation to the application boundary can be seen on **Figure 1**.
- 2.1.5 Based on the nature of the proposed development, it has been decided that the following six Natura 2000 and Ramsar sites require consideration as to whether they could be affected:
- Dorset Heathlands SPA (immediately adjacent to the southern boundary);
 - Dorset Heathlands Ramsar (immediately adjacent to the southern boundary);
 - Dorset Heaths SAC (immediately adjacent to the southern boundary);
 - Avon Valley SPA – 4.8km east;
 - Avon Valley Ramsar – 4.8km east;
 - River Avon SAC – 4.8km east;
 - New Forest SPA – 7.8 km east;
 - New Forest Ramsar - 7.8km east; and
 - New Forest SAC – 7.8km east.

3 Methodology

3.1 Key Principles

- 3.1.1 The key principles adopted during the collation and analysis of information are set out below in **Table 3.1**.

Table 3.1 Key Principles Underpinning the Assessment Methodology.

Key principles underpinning the assessment methodology	
Principle	Rationale
Use of best available existing information	We will use best available existing information to inform the assessment. This will include ecological information gathered on behalf of the client, information made available through production of the Preliminary Ecological Appraisal (RPS, 2025), and information from other sources, including Natural England, British Trust for Ornithology, and others.
Proportionality	We will ensure that the level of detail provided in the assessment reflects the level of detail in the planning application (i.e. that the assessment is proportionate).
Consultation	We will ensure continued consultation with Natural England and other stakeholders (such as the local planning authority) during production of the assessment and ensure that we take on board their comments.
Transparency in the assessment process	We will endeavour to keep the process as open, transparent and simple as possible while ensuring an objective and rigorous assessment in compliance with the Habitats Directive, Habitats Regulations and emerging best practice.
Audit trail	We will ensure that the process followed, and the conclusions reached are clearly documented to ensure there is a clear audit trail.

3.2 Process

- 3.2.1 The stages of HRA are described below, adapted from Government 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 significant adverse effects remain.

Stage 1 – Qualifying Interest Features

- 3.2.2 Collect information on identified Natura 2000 and Ramsar sites and their conservation objectives.

Stage 2 – Likely Significant Effect

- 3.2.1 Determine whether, in the absence of mitigation/avoidance measures, the planning application is likely to have a significant effect on relevant Natura 2000 and Ramsar sites.

Stage 3 – Appropriate Assessment

- 3.2.2 Assess the likely significant effects of the planning application on the conservation objectives of relevant Natura 2000 and Ramsar sites and determine whether no adverse effect can be concluded both alone and in-combination with other plans or projects.

Stage 4 – In-combination

- 3.2.3 Undertake a similar assessment of the proposal to that described above but in combination with other plans and projects that could act, collectively, to result in an adverse effect on a Natura 2000 or Ramsar site.

3.3 Stage 1 – Qualifying Interest Features

- 3.3.1 The conservation objectives provide the basis for determining what is currently, or may cause, a significant effect, and for informing the scope of appropriate assessments.
- 3.3.2 The assessment will focus on the qualifying features listed within the official Natura 2000 citations as these are the features for which the site is legally designated.
- 3.3.3 In addition to qualifying interest features, it is necessary to explore the environmental features and conditions required to maintain the integrity of the Natura 2000 and Ramsar sites, as well as both current condition and trends in environmental processes.

3.4 Stage 2 - Likely Significant Effect

- 3.4.1 The second stage is to determine whether there is likely to be a significant effect. This is essentially a risk assessment to decide whether a more detailed assessment is required, and if so, the scope of the issues and features to be addressed. This involves identifying the potential pathways through which the Proposed Development could affect the interest features of relevant Natura 2000 and Ramsar sites and then assessing in broad terms the magnitude of each effect to determine whether it is likely to have a significant effect. In making this determination, we have taken into account the risk of an effect not just on those sites within the administrative boundary of the local area, but in line with best practice, considered potential ways in which the application could impact upon other relevant Natura 2000 or Ramsar sites.
- 3.4.2 The main purpose of this stage is to screen out those aspects of the proposal that can be considered not likely to have a significant effect, as well as those features of each relevant Natura 2000 and Ramsar site that are not likely to be significantly affected. Judgements have been based on sound reasoning and within the context of best available knowledge on the various ways in which development of the nature proposed could impact on the interest features of the relevant Natura 2000 and Ramsar sites. At this stage, they are made without consideration of mitigation/avoidance measures. If it cannot be concluded with confidence that adverse effects are unlikely, then under the precautionary principle, it is assumed that the issue requires more detailed consideration.

3.5 Stage 3 - Appropriate Assessment

- 3.5.1 When a plan or project cannot be ‘screened out’ as being unlikely to have a significant effect on a Natura 2000 or Ramsar site, it is necessary to progress to explore whether there are any adverse effects, including whether any suitable avoidance or mitigation measures can be incorporated to avoid or reduce those adverse effects. Experience suggests that the best approach to addressing this is on a site-by-site basis, with avoidance / mitigation measures focused on the environmental conditions needed to maintain site integrity. This is in line with Department for Communities and Local Government that the level of detail of the assessment, whilst meeting the relevant requirements of the Habitats Regulations, should be ‘appropriate’ to the level of plan or project that it addresses.

3.6 Stage 4 – In-combination Assessment

- 3.6.1 The Habitats Regulations require that a decision to grant permission can only be made once the Competent Authority is satisfied that no adverse effects on the integrity of the Natura 2000 sites in question are likely both alone and in-combination with other plans and projects. Therefore, Stage 4 of the HRA process requires the identification of other plans and projects that might affect the interest features of the relevant Natura 2000 sites in combination with the outline planning application and decide whether there any adverse effects that might occur in-combination that did not occur when considered alone.

4 Stage 1 – Qualifying Interest Features

4.1 Dorset Heathlands SPA and Ramsar

- 4.1.1 The Dorset Heathlands SPA and Ramsar site lies adjacent to the Proposed Development, with the closest boundary approximately, from the site.
- 4.1.2 The Dorset Heathlands SPA and Ramsar site covers an area of approximately 8,169 ha and comprises a complex mosaic of lowland heathland, wet and dry heath, mires, bogs, acid grassland, scrub, woodland, and open water habitats. The site also includes valley mires, pools, and associated wetland features.
- 4.1.3 The Ramsar site is designated for its internationally important wetland habitats, supporting a range of rare and threatened species and communities, including extensive areas of wet heath, valley mire, and oligotrophic standing waters. The site also supports notable invertebrate and plant assemblages, as well as breeding amphibians such as great crested newt *Triturus cristatus*.
- 4.1.4 The SPA is designated under Article 4 of the Birds Directive for its internationally important populations of the following qualifying species:
- **A224** Nightjar *Caprimulgus europaeus* (Breeding)
 - **A246** Dartford warbler *Sylvia undata* (Breeding)
 - **A246** Woodlark *Lullula arborea* (Breeding)
- 4.1.5 The SPA also qualifies for supporting internationally important populations of regularly occurring migratory bird species, including:
- **A246** Hen harrier *Circus cyaneus* (Wintering)
 - **A082** Merlin *Falco columbarius* (Wintering)
- 4.1.6 The site supports more than 1% of the GB breeding populations of nightjar, Dartford warbler, and woodlark, and regularly supports significant numbers of wintering hen harrier and merlin. The mosaic of heathland and wetland habitats provides essential breeding, foraging, and roosting areas for these species.
- 4.1.7 The Conservation Objectives for the SPA (as set out in the European Site Conservation Objectives for Dorset Heathlands Special Protection Area, Site Code: UK9010101) are to ensure that the integrity of the site is maintained or restored as appropriate, and to ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:
- The extent and distribution of the habitats of the qualifying features;
 - The structure and function of the habitats of the qualifying features;
 - The supporting processes on which the habitats of the qualifying features rely;
 - The population of each of the qualifying features; and
 - The distribution of the qualifying features within the site.
- 4.1.8 The Dorset Heathlands SPA conservation objectives are also relevant to the Ramsar site, as the Ramsar features overlap with the SPA features in terms of habitat types, species, and threats. Applying the SPA conservation objectives provides an effective means of assessing and safeguarding the integrity of both designations.

4.2 Dorset Heathlands SAC

- 4.2.1 The Dorset Heathlands SAC is located adjacent to the Proposed Development, with the closest boundary being immediately adjacent to the southern site boundary.
- 4.2.2 The SAC covers an area of approximately 8,169 ha and comprises an extensive mosaic of lowland heathland habitats, including dry and wet heath, valley mires, bogs, and oligotrophic waters. The site also includes areas of acid grassland, scrub, woodland, and open water, supporting a wide range of rare and threatened species and communities. The Dorset Heathlands SAC is considered to be one of the best examples of lowland heathland in the United Kingdom.
- 4.2.3 The site is designated as it contains the following qualifying features listed in Annex I of the Habitats Directive, being the primary reason for the selection of this site:
- **4010** Northern Atlantic wet heaths with *Erica tetralix*
 - **4030** European dry heaths
 - **7150** Depressions on peat substrates of the *Rhynchosporion*
- 4.2.4 The following Annex I habitats are present as qualifying features, but are not a primary reason for the selection of this site:
- **3110** Oligotrophic waters containing very few minerals of sandy plains *Littorelletalia uniflorae*
 - **3130** Oligotrophic to mesotrophic standing waters with vegetation of the *Littorelletea uniflorae* and/or *Isoeto-Nanojuncetea*
 - **3160** Natural dystrophic lakes and ponds
 - **7140** Transition mires and quaking bogs
 - **7150** Depressions on peat substrates of the *Rhynchosporion* (also listed as a primary reason above)
- 4.2.5 The following Annex II species are present as qualifying features, but are not a primary reason for the selection of this site:
- **1166** Great crested newt *Triturus cristatus*

4.3 Avon Valley SPA and Ramsar

- 4.3.1 The Avon Valley SPA and Ramsar site lies adjacent to the Proposed Development, with the closest boundary approximately 4.8 km east from the site.
- 4.3.2 The Avon Valley SPA and Ramsar site covers an area of approximately 2,356 ha and comprises a diverse mosaic of wetland habitats, including floodplain grazing marsh, wet grassland, fen, swamp, reedbed, river channels, and open water. The site is characterised by seasonally inundated meadows and a network of ditches and channels associated with the River Avon.
- 4.3.3 The Ramsar site is designated for its internationally important wetland habitats, supporting a range of rare and threatened species and communities. The site is particularly notable for its extensive floodplain grasslands, diverse aquatic flora, and invertebrate assemblages, as well as its role in supporting significant numbers of wintering and breeding waterbirds.
- 4.3.4 The SPA is designated under Article 4 of the Birds Directive for its internationally important populations of the following qualifying species:
- **A043** Bewick's swan *Cygnus columbianus bewickii* (Wintering);
 - **A051** Gadwall *Anas strepera* (Wintering); and

- **A156** Black-tailed godwit *Limosa limosa* (Wintering).
- 4.3.5 The SPA also qualifies for supporting internationally important populations of regularly occurring migratory bird species, including:
 - **A046a** Dark-bellied brent goose *Branta bernicla bernicla* (Wintering)
 - **A140** Ruff *Calidris pugnax* (Passage and Wintering)
 - **A050** Wigeon *Anas penelope* (Wintering)
 - **A052** Teal *Anas crecca* (Wintering)
 - **A054** Shoveler *Anas clypeata* (Wintering)
 - **A130** Avocet *Recurvirostra avosetta* (Wintering)
- 4.3.6 The site regularly supports more than 1% of the GB or northwest European populations of several waterbird species and is one of the most important sites in the UK for wintering wildfowl and waders. The floodplain grasslands and associated wetlands provide essential feeding, roosting, and breeding areas for these species.
- 4.3.7 The Conservation Objectives for the SPA (as set out in the European Site Conservation Objectives for Avon Valley Special Protection Area, Site Code: UK9011041) are to ensure that the integrity of the site is maintained or restored as appropriate, and to ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:
 - The extent and distribution of the habitats of the qualifying features;
 - The structure and function of the habitats of the qualifying features;
 - The supporting processes on which the habitats of the qualifying features rely;
 - The population of each of the qualifying features; and
 - The distribution of the qualifying features within the site.
- 4.3.8 The Avon Valley SPA conservation objectives are also relevant to the Ramsar site, as the Ramsar features overlap with the SPA features in terms of habitat types, species, and threats. Applying the SPA conservation objectives provides an effective means of assessing and safeguarding the integrity of both designations.

4.4 River Avon SAC

- 4.4.1 The River Avon SAC is located 4.8 km east of the Proposed Development.
- 4.4.2 The SAC covers an area of approximately 1,481.92 ha and comprises the River Avon and its tributaries, associated floodplain habitats, and a mosaic of aquatic and riparian environments. The site is considered one of the best examples of chalk river systems in the United Kingdom, supporting a diverse range of aquatic and wetland habitats, including watercourses, fen, swamp, and wet grassland.
- 4.4.3 The site is designated as it contains the following qualifying features listed in Annex I of the Habitats Directive, being the primary reason for the selection of this site:
 - **3260** Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitriche-Batrachion* vegetation
- 4.4.4 The following Annex I habitats are present as qualifying features, but are not a primary reason for the selection of this site:
 - **6430** *Hydrophilous* tall herb fringe communities of plains and of the montane to alpine levels
- 4.4.5 The following Annex II species are present as qualifying features, but are not a primary reason for site selection:

- **1016** Desmoulin's whorl snail *Vertigo moulinsiana*
- **1092** White-clawed (or Atlantic stream) crayfish *Austropotamobius pallipes*
- **1106** Atlantic salmon *Salmo salar*
- **1163** Bullhead *Cottus gobio*
- **1166** Great crested newt *Triturus cristatus*
- **1355** Otter *Lutra lutra*

4.5 New Forest SPA and Ramsar

- 4.5.1 The New Forest SPA is located 7.8 km east of the Proposed Development.
- 4.5.2 The New Forest SPA covers an area of approximately 29,053.8 ha and comprises a complex of lowland heathland, valley mire, bog, grassland, and ancient and semi-natural woodland habitats. The site is internationally important for its breeding and wintering bird populations.
- 4.5.3 The SPA is designated under Article 4 of the Birds Directive for its internationally important populations of the following qualifying species:
- **A224** Nightjar *Caprimulgus europaeus* (Breeding)
 - **A246** Woodlark *Lullula arborea* (Breeding)
 - **A222** Honey buzzard *Pernis apivorus* (Breeding)
 - **A229** Hobby *Falco subbuteo* (Breeding)
 - **A082** Merlin *Falco columbarius* (Wintering)
 - **A224** Hen harrier *Circus cyaneus* (Wintering)
- 4.5.4 The site regularly supports more than 1% of the GB breeding populations of nightjar and woodlark, and significant numbers of other Annex I and migratory bird species. The mosaic of heathland, mire, and woodland habitats provides essential breeding, foraging, and roosting areas for these species.
- 4.5.5 The Conservation Objectives for the SPA (as set out in the European Site Conservation Objectives for New Forest Special Protection Area, Site Code: UK9011031) are to ensure that the integrity of the site is maintained or restored as appropriate, and to ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:
- The extent and distribution of the habitats of the qualifying features;
 - The structure and function of the habitats of the qualifying features;
 - The supporting processes on which the habitats of the qualifying features rely;
 - The population of each of the qualifying features; and
 - The distribution of the qualifying features within the site.
- 4.5.6 The New Forest SPA conservation objectives are also relevant to the Ramsar site, as the Ramsar features overlap with the SPA features in terms of habitat types, species, and threats. Applying the SPA conservation objectives provides an effective means of assessing and safeguarding the integrity of both designations.

4.6 New Forest SAC

- 4.6.1 The New Forest SAC is located to the east of the Proposed Development, with the closest area being approximately 7.8 km from the site.

- 4.6.2 The SAC covers an area of approximately 28,002.5 ha and comprises an extensive mosaic of habitats, including large tracts of lowland heathland, wet and dry heaths, valley mires, bogs, grassland, ancient and semi-natural woodland, and oligotrophic water bodies. The New Forest is considered one of the most important and extensive areas of semi-natural habitat in Western Europe.
- 4.6.3 The site is designated as it contains the following qualifying features listed in Annex I of the Habitats Directive, being the primary reason for the selection of this site:
- **4010** Northern Atlantic wet heaths with *Erica tetralix*
 - **4030** European dry heaths
 - **6410** Molinia meadows on calcareous, peaty or clayey-silt-laden soils *Molinion caeruleae*
 - **7110** Active raised bogs
 - **7120** Degraded raised bogs still capable of natural regeneration
 - **7140** Transition mires and quaking bogs
 - **7150** Depressions on peat substrates of the Rhynchosporion
 - **9190** Old acidophilous oak woods with *Quercus robur* on sandy plains
- 4.6.4 The following Annex I habitats are present as qualifying features, but are not a primary reason for the selection of this site:
- **3130** Oligotrophic to mesotrophic standing waters with vegetation of the *Littorelletea uniflorae* and/or *Isoeto-Nanojuncetea*
 - **3150** Natural eutrophic lakes with *Magnopotamion* or *Hydrocharition*-type vegetation
 - **7230** Alkaline fens
- 4.6.5 The following Annex II species are present as qualifying features, but are not a primary reason for site selection:
- **1016** Desmoulin's whorl snail *Vertigo moulinsiana*
 - **1096** Southern damselfly *Coenagrion mercuriale*
 - **1166** Great crested newt *Triturus cristatus*
 - **1355** Otter *Lutra lutra*

5 Stage 2 – Likely Significant Effect

- 5.1.1 This section deals with the screening of likely significant negative effects on the qualifying feature and sub-features of the relevant Natura 2000 and Ramsar sites as a result of the construction and operation of the proposed project.
- 5.1.2 The possibility of the development proposed within the application boundary having a likely significant effect on any of the designated sites identified in Section 4 is discussed for each of impact pathway in turn below.
- 5.1.3 The environmental pathways that could lead to a significant effect, as a result of the Development may be summarised as:
- Direct loss or damage of habitats within a designated site or of nearby areas used by interest species;
 - Change in management regimes (e.g. grazing / mowing of marshland) of habitats within a designated site or of nearby areas used by interest species;
 - Loss of future space to allow for managed realignment to avoid coastal squeeze;
 - Urbanisation that results in over shadowing, reduction of sight lines or which hinders flight paths;
 - Air quality;
 - Water quality;
 - Hydrological changes, including in the balance of saline and non-saline conditions;
 - Disturbance (activity, recreation, noise and lighting); and
 - Introduction or spread of non-native invasive species.

5.2 Dorset Heathlands SPA and Ramsar

Direct loss or damage of habitats used by interest species

- 5.2.1 The construction phase resulted in no direct habitat loss to the Dorset Heathlands SPA and Ramsar site, as the designated boundary lies entirely outside the application site. Although the SPA/Ramsar is directly adjacent, it is under the control of the Ministry of Defence (MoD), with access strictly limited. This restriction ensures that construction workers, vehicles, and associated activities would not have encroached upon designated sites, in line with best practice guidance for working adjacent to protected areas (Natural England, 2018).
- 5.2.2 The Dorset Heathlands SPA is designated for its internationally important breeding populations of nightjar, Dartford warbler, merlin, woodlark, and hen harrier. Comprehensive breeding bird surveys (Appendix 8.1) recorded only nightjar among these citation species, with four territories identified within the MoD land to the south, approximately 100–150m from the application boundary. No nightjar activity was recorded within the application site itself.
- 5.2.3 This robust, site-specific evidence demonstrates that the neutral and modified grassland of the application site does not provide a significant resource for nightjar associated with the SPA. This is in keeping with recent literature on nightjar habitats and preferences (Kennedy and White, 2023), which found that in a study where 30% of the landscape was made up of improved grassland, there was a significant avoidance of the habitat by nightjar.
- 5.2.4 While the site is within the 400 m buffer zone identified in Natural England and local policy (Dorset Heathlands Planning Framework) as an area of highest sensitivity to disturbance

and functional linkage, the rationale for this buffer is based on the potential for suitable habitat to be used by SPA species; which in this instance, is neither present or evidenced.

- 5.2.5 In this case, the absence of nightjar from the site, as confirmed by targeted surveys, provides strong evidence that the grassland is not functionally linked in any meaningful way for this species, nor acting as supplementary habitat.
- 5.2.6 The grassland (retained, but subject to disturbance) is therefore of suboptimal quality for nightjar compared to the extensive, higher-value heathland within the SPA/MoD land. The SPA/MoD land provides a large area of contiguous, undisturbed foraging and nesting habitat, likely meeting the core needs of the local nightjar population.
- 5.2.7 Similarly, research by Liley et al. (2009) on the Dorset Heathlands found that development impacts are most significant where there is either direct suitable habitat loss or loss of adjacent land when used by SPA species, neither of which applies in this case.
- 5.2.8 This assessment aligns with the precautionary principle embedded in the Habitats Regulations and is supported by both case law and Natural England's guidance, which emphasize that, where there is no direct or functional connection between the development site and the SPA, significant effects can be confidently excluded.
- 5.2.9 On the basis of site-specific survey evidence, habitat quality, management context, and relevant research and case law, it can be concluded beyond reasonable scientific doubt that the proposed development will not adversely affect the integrity of the Dorset Heathlands SPA, Ramsar with respect to direct loss or damage of habitats used by interest species, including nightjar.
- 5.2.10 Given the distances involved with regard to the other SPA and Ramsar sites (Avon Valley and New Forest), being a minimum of 4.8km, impacts upon these can be screened out of adversely impacting the designated sites.

Change in habitat management regimes

- 5.2.11 The proposed development will seek to formalise the use of the currently open neutral and modified grassland adjacent to the Dorset Heathlands SPA into a caravan park. This change in management regime will likely result in a reduction in habitat openness and an increase in human activity, including greater footfall, trampling, and disturbance associated with the use of the site by residents and visitors.
- 5.2.12 The conservation objectives for the Dorset Heathlands SPA require the maintenance or restoration of the extent, distribution, structure, and function of the habitats of qualifying features, including breeding nightjar Dartford warbler, and woodlark. These species are dependent on open, structurally diverse habitats for foraging and, in some cases, nesting. Increased trampling and disturbance can further reduce habitat quality by compacting soil, reducing invertebrate prey abundance, and discouraging use by sensitive species (Liley & Clarke, 2003; Liley et al., 2009).
- 5.2.13 However, as established in the preceding assessment, comprehensive breeding bird surveys have confirmed that nightjar is not currently using the application site for nesting or regular foraging. The neutral and modified grassland is of suboptimal quality compared to the extensive, higher-value heathland within the adjacent SPA, and the site is not considered to be functionally linked in any meaningful way to the SPA's qualifying bird populations.
- 5.2.14 Given this, while the change in management regime will result in a loss of openness and increased disturbance, the lack of functional linkage means that these changes are not expected to have a significant effect on the SPA's qualifying features. In line with best practice and case law (e.g., *Weaver v. Secretary of State for Communities and Local Government* [2015]), the assessment of potential impacts on European sites should be proportionate to the likelihood of a real effect. Where robust, site-specific evidence

demonstrates that the land is not functionally linked, detailed assessment of changes in management regime is not required, and any risk to SPA integrity can be confidently ruled out.

- 5.2.15 In summary, although the conversion of the site to a caravan park will increase trampling and disturbance, the absence of functional linkage to the SPA's qualifying features means that these changes do not pose a risk to the integrity of the Dorset Heathlands SPA.
- 5.2.16 Given the distances involved with regard to the other SPA and Ramsar sites (Avon Valley and New Forest), being a minimum of 4.8 km, impacts upon these can be screened out of further assessment.

Urbanisation

- 5.2.17 New urban development can affect designated sites and their qualifying features by introducing vertical structures and light that may overshadow important habitat, disrupt flight lines and sightlines, reduce habitat suitability, or increase collision risk for birds. Such effects are most likely where developments introduce taller built elements, extensive lighting or new linear features that fragment commuting routes between foraging and roosting/roosting or nesting areas.
- 5.2.18 During the construction phase of the project there was no large plant on the site that might over-shadow the SPA/Ramsar site.
- 5.2.19 The Proposed Development comprises single-storey static caravan pitches and associated low-level infrastructure. The immediate landscape context already contains single-storey-built form (including existing caravan park facilities and Ministry of Defence infrastructure). As a result, the scheme does not introduce greater vertical scale than is already present locally and will not produce new tall structures that would cast additional shadow over qualifying habitats, create novel obstructions to flight lines, or materially increase collision risk above the existing baseline.
- 5.2.20 The proposed development will not materially increase urbanisation pressure on the Dorset Heathlands SPA/Ramsar given the prevailing land uses (MoD, residential and tourism) and the low profile of the new built form. Lighting will be designed and managed to avoid unnecessary spill onto surrounding habitat (using warm-white, downward-shielded fittings, curfew timers and lux thresholds at habitat boundaries), and landscaping will reinforce existing vegetation buffers. Taken together, design measures, retention of existing low-height land uses, and the absence of new tall structures mean there is no plausible pathway by which the development would give rise to significant adverse effects on the integrity of the Dorset Heathlands SPA/Ramsar.
- 5.2.21 Other SPA and Ramsar (Avon Valley and New Forest) are located at least 4.8 km from the development. At these distances, effects from minor increases in low-level-built development (single-storey caravans), light spill controlled by the lighting strategy, or occasional human presence are highly unlikely to be perceptible to birds or other mobile qualifying features that use those sites. Consequently, the potential for significant adverse impacts on these more distant designated sites can be screened out.

Air quality

- 5.2.22 The two air quality issues during the lifetime of the development comprise dust and increased traffic emissions.

Construction/demolition dust

- 5.2.23 The potential for dust release exists during the construction and demolition phases, with potential sources including site clearance, earthworks, building demolition and vehicle movements.
- 5.2.24 Based on studies elsewhere, it is anticipated that the majority of dust would be deposited in the area immediately surrounding the source (up to 50m away) and that no change in level of exposure is expected beyond 300 metres from the site.
- 5.2.25 Temporary dust emissions during construction can affect vegetation health or leaf structure at close range. However, given the small scale of the construction activities (significantly less than the 12,000m³ threshold for buildings that generate a 'small' effect), and the receptor being more than 50 m from the construction works adjacent to the northern boundary of the site, the air quality/dust assessment has concluded that there would be a negligible effect associated with construction. Where electrical hookups have been installed in closer proximity, works of this nature are very unlikely to generate any notable dust that could affect adjacent receptors.
- 5.2.26 Consequently, the potential for significant adverse impacts on these, and the more distant designated sites (Avon Valley and New Forest SPA and Ramsar) can be screened out.

Traffic – construction/demolition

- 5.2.27 Using the Design Manual for Roads and Bridges (DMRB) LA 105 – Air Quality, ecological receptors within 200 metres of a road are considered potentially sensitive to emissions, particularly nitrogen oxides (NO_x) and nitrogen deposition, which can affect sensitive vegetation communities such as ancient or semi-natural woodland.
- 5.2.28 However, under LA 105, detailed air quality assessment is only required where Heavy Duty Vehicle (HDV) flow increases by more than 200 AADT on roads within 200 metres of sensitive ecological sites.
- 5.2.29 In this case, proposed development traffic increases fall below the DMRB screening thresholds, and therefore no significant increase in airborne pollutants or nitrogen deposition is predicted during the temporary construction phase, meaning that the integrity of the Dorset Heathlands SPA and Ramsar will not be adversely impacted, and can be screened out of further assessment.
- 5.2.30 Consequently, the potential for significant adverse impacts the more distant designated sites (Avon Valley and New Forest SPA and Ramsar) can be screened out.

Traffic - Operational

- 5.2.31 There is potential for impacts to occur to the SPA and Ramsar via air quality impacts arising from the operational phase of the development via traffic emissions from additional vehicle traffic. For sensitive ecological receptors, the IAQM Guidance on the assessment of dust from demolition and construction sets out 200 m as the distance from the site boundary and from the site traffic route(s) within which there could potentially be nuisance dust and PM10 effects.
- 5.2.32 Using the Design Manual for Roads and Bridges (DMRB) LA 105 – Air Quality, ecological receptors within 200 metres of a road are considered potentially sensitive to emissions, particularly nitrogen oxides (NO_x) and nitrogen deposition, which can affect sensitive vegetation communities such as ancient or semi-natural woodland. However, under the guidance, a detailed air quality assessment is only required where the change in daily traffic exceeds 1,000 AADT (Annual Average Daily Traffic).

- 5.2.33 In this case, proposed development traffic increases fall below the DMRB screening thresholds, and therefore no significant increase in airborne pollutants or nitrogen deposition is predicted. The SPA is not designated for the presence of particularly sensitive plant assemblages (e.g. lichen-rich communities) and is considered to have a relatively low sensitivity to marginal increases in atmospheric pollutants. Consequently, the risk of air quality impacts is considered negligible, and no significant effects are anticipated in this respect.

Water quality

- 5.2.34 The quality of the water entering Natura 2000 and Ramsar sites is an important determinant of habitat condition and hence the species they support. Poor water quality can have a range of ecological impacts.
- 5.2.35 Likely significant effects on the Dorset Heathlands SPA and Ramsar sites cannot be excluded due to the close proximity of the nearest boundary to the development site (immediately adjacent to the southern boundary), and the number of nearby drainage ditches associated with this. As such, the issue of water quality is taken through to Stage 3 Appropriate Assessment as significant effects cannot be screened out for the Dorset Heathlands SPA and Ramsar.
- 5.2.36 For the more distant designated sites (New Forest SPA / Ramsar and Avon Valley SPA / Ramsar), there is no direct linkage, and so, impacts arising from water quality on these designated sites can be screened out.

Hydrological changes

- 5.2.37 The site is not specifically linked to the Dorset Heathlands SPA / Ramsar, albeit it is immediately adjacent and so during the operational phase of the development, there is potential for surface water generated on-site to infiltrate into the underlying aquifer and subsequently enter the adjacent ditch network, which forms part of the Dorset Heathlands SPA and Ramsar site.
- 5.2.38 Sustainable water management measures will be used to control the surface water runoff from the development Site, thereby managing the flood risk to the Site and surrounding areas from surface water runoff. These measures will also improve the quality of water discharged from the Site. According to the Flood Risk Assessment, filter Drains will form the main attenuation feature for both buildings positioned east and west.
- 5.2.39 All foul water from the site will be managed via a package treatment plant (PtP). This will be secured via a Unilateral Undertaking that all foul waste from the septic tank is to be discharged to Palmersford WRC. This will ensure that there is no impact on Nutrient Neutrality in the Avon, as Palmersford WRC discharges to The Stour. Therefore, impacts arising from hydrological changes can be screened out from further assessment for the Dorset Heathlands SPA and Ramsar.
- 5.2.40 The New Forest SPA and Ramsar is not considered to be susceptible to impacts arising from extra nutrient (nitrate / phosphate) impacts (New Forest District Council, 2024), and therefore, further assessment on this receptor from this pathway can be screened out.

Disturbance

- 5.2.41 Disturbance can be caused by visible activity (construction, operation or recreation), noise and lighting. Because of the relative complexity of these issues, they can have impacts on breeding and wintering birds within several hundred metres depending on the nature of the activity and the receptors.

- 5.2.42 The Dorset Heathlands SPA and Ramsar is designated for its internationally important breeding populations of nightjar, Dartford warbler, merlin, woodlark, and hen harrier.
- 5.2.43 Given the proximity of the designated site to the development boundary; impacts cannot be ruled out at this stage and will therefore be taken through to an Appropriate Assessment.
- 5.2.44 Given the distances involved for the remaining SPA and Ramsar sites (being a minimum of 4.8km) impacts arising from disturbance can be screened out.

Introduction or spread of non-native invasive species

- 5.2.45 The movement of people and traffic, as well as importation of material and plants to a site, can result in the introduction of non-native species to a site. This is primarily an issue relating to protected habitats due to the ability of non-native species to alter habitat composition, leading to impaired species diversity. In extreme circumstances invasive species can also change habitat structure and food availability, issues of more immediate concern to protected bird assemblages.
- 5.2.2 A comprehensive UKHab and subsequent targeted botanical assessments were undertaken to identify the presence of non-native or invasive plant species within the application site (see Appendix 8.1).
- 5.2.3 Given the absence of invasive species at baseline, the risk of their introduction or spread as a result of the proposed development is considered to be low.
- 5.2.4 Importantly, construction workers and associated activities did not have access to the adjacent MoD land, which forms part of the Dorset Heathlands SPA/Ramsar site. This access restriction further reduces the risk of accidental transfer of non-native or invasive species into the designated site, ensuring robust biosecurity and protection of sensitive habitats.
- 5.2.1 The issue of introducing and spread of non-native species is therefore screened out from further consideration on the grounds of not likely having an adverse effect.
- 5.2.2 Given the distances involved for the remaining SPA and Ramsar sites (being a minimum of 4.8km) impacts arising from disturbance can be screened out.

5.3 Dorset Heathlands SAC

Direct loss or damage of habitats

- 5.3.1 The application site is located adjacent to, but does not overlap with, the boundary of the Dorset Heathlands SAC. No part of the designated SAC falls within the development footprint. The Dorset Heathlands SAC is designated for its internationally important lowland heathland habitats, including Northern Atlantic wet heaths with *Erica tetralix*, European dry heaths, depressions on peat substrates, and associated wetland features. These habitats support a range of rare and protected species, including GCN (which are a non-qualifying feature, albeit present).
- 5.3.2 The construction phase caused no direct impact to the Dorset Heathlands SAC via habitat loss, given that no part of the designated site falls within the site boundary.
- 5.3.3 Comprehensive UKHab and botanical surveys confirm that no SAC designated habitats are present within the application site. The site itself comprises modified and neutral grassland, ephemeral/short perennial vegetation, scrub and scattered trees, none of which meet the criteria for SAC citation habitats.

- 5.3.4 All ditches along the boundaries were subject to ecological survey. At the time of survey, none of these features held water, and they were assessed as unsuitable for supporting Great Crested Newts (GCN) or other aquatic species of conservation concern. The absence of standing water and the lack of suitable aquatic habitat mean that the likelihood of GCN breeding within the application site is negligible. Therefore, the proposed works will not result in the loss of GCN breeding habitat.
- 5.3.5 Given the clear separation between the development footprint and the SAC boundary, and the absence of any qualifying SAC habitats or species within the site, there has been no direct loss, degradation, or fragmentation of SAC-designated habitats. There was also no impact upon any waterbodies or ditches capable of supporting GCN or other protected aquatic species during their breeding life stage.
- 5.3.6 Given the distances involved with regard to the other SAC sites (River Avon and New Forest), being a minimum of 4.8km, impacts upon these can be screened out of adversely impacting the designated sites.

Change in habitat management regimes

- 5.3.7 The proposed development will form the neutral and modified grassland adjacent to the Dorset Heathlands SAC into a caravan park. This change in land use and management is likely to reduce habitat openness and introduce increased human presence and activity, including greater footfall, trampling and localized disturbance associated with site occupation and recreational use.
- 5.3.8 The conservation objectives for the Dorset Heathlands SAC require the maintenance or restoration of the extent, distribution, structure and function of the qualifying heathland habitat types. These objectives seek to conserve the characteristic vegetation structure, substrate conditions and ecological processes of lowland heath. Increased trampling, vegetation modification and changes in management regime have the potential to alter soil structure, vegetation composition and invertebrate communities and thereby reduce habitat quality where such pressures affect qualifying habitats or their immediate supporting areas.
- 5.3.9 However, site-specific habitat survey work demonstrates that the application site does not support Annex I heathland communities or other qualifying SAC habitat types and is comprised of neutral and modified grassland that lacks the structural, substrate and vegetation characteristics required to function as supporting habitat for the SAC. The grassland therefore represents suboptimal habitat relative to the contiguous, higher-quality heathland within the SAC/MoD land. As a result, the application site is not demonstrably functionally linked to the maintenance of the SAC qualifying habitats in a way that would be vital to their favourable conservation status.
- 5.3.10 On that basis, while the proposed change of management will reduce openness and increase local disturbance on the application site, there is no evidence that these changes would lead to deterioration in the extent, distribution, structure or function of the qualifying heathland habitats within the Dorset Heathlands SAC.
- 5.3.11 In summary, although conversion to a caravan park will produce localized habitat degradation (loss of openness, trampling and increased human activity) on the application site itself, the absence of qualifying SAC habitat on site and the availability of extensive, higher-quality heathland within the SAC mean that these changes are not considered likely to result in an adverse effect on the integrity of the Dorset Heathlands SAC with respect to the proposed management changes.
- 5.3.12 Given that other European designated sites (including the River Avon SAC and New Forest areas SAC) are located at greater distances and are not connected via contiguous heathland habitat to the application site, impacts upon those more distant sites can be screened out of further assessment with respect to direct habitat loss or degradation.

Urbanisation

- 5.3.13 New urban development can affect habitat-designated sites by introducing built elements and artificial lighting that alter local microclimates, cast shade across adjacent vegetation, change moisture regimes, promote edge effects, or facilitate the incursion of competitively vigorous scrub and non-native species. Such changes can modify the structure and function of sensitive habitat communities where developments introduce significant vertical scale, continuous hard edges, or uncontrolled light spill onto adjacent habitat.
- 5.3.14 During the construction phase of the project there was no large plant on the site that might over-shadow the SPA/Ramsar site.
- 5.3.15 The Proposed Development comprises single-storey static caravan pitches and associated low-level infrastructure. The immediate landscape context already contains single-storey-built form (including existing caravan park facilities and Ministry of Defence infrastructure). As a result, the scheme does not introduce greater vertical scale than is already present locally and will not produce new tall structures that would cast additional shadow over qualifying habitats, create novel obstructions to flight lines, or materially increase collision risk above the existing baseline.
- 5.3.16 The proposed development will not materially increase urbanisation pressure on the Dorset Heathlands SPA/Ramsar given the prevailing land uses (MoD, residential and tourism) and the low profile of the new built form.
- 5.3.17 Lighting will be designed and managed to avoid unnecessary spill onto surrounding habitat (using warm-white, downward-shielded fittings, curfew timers and lux thresholds at habitat boundaries), and landscaping will reinforce existing vegetation buffers. Taken together, design measures, retention of existing low-height land uses, and the absence of new tall structures mean there is no plausible pathway by which the development would give rise to significant adverse effects on the integrity. Lighting will be designed and managed to avoid unnecessary spill onto adjoining habitat by employing downward-shielded, warm-white fittings, directional mounting, low lux specifications at habitat boundaries, and timed controls/curfews. Landscaping proposals will retain and strengthen existing vegetation buffers and hedgerows along the site perimeter to maintain screening and to reduce edge exposure. Taken together, the limited vertical profile of the development, the lighting strategy and the retention/enhancement of vegetated buffers remove any credible pathway by which the development would significantly alter the extent, structure or function of the SAC qualifying habitat through shading, light pollution or edge-related degradation.
- 5.3.18 Other European designated sites (including the River Avon SAC and New Forest SAC) are located at least 4.8 km from the development and are not contiguous with the Dorset Heathlands SAC. At these distances, any minor increases in low-level-built development are highly unlikely to produce detectable changes in habitat condition or function.
- 5.3.19 Therefore, significant adverse effects on the Dorset Heathland SAC those more distant habitat designations can be screened out.

Air quality

- 5.3.20 The two air quality issues during the lifetime of the development comprise dust and increased traffic emissions.

Construction/demolition dust

- 5.3.21 The potential for dust release exists during the construction and demolition phases, with potential sources including site clearance, earthworks, building demolition and vehicle movements.

- 5.3.22 Based on studies elsewhere, it is anticipated that the majority of dust would be deposited in the area immediately surrounding the source (up to 50m away) and that no change in level of exposure is expected beyond 300 metres from the site.
- 5.3.23 Temporary dust emissions during construction can affect vegetation health or leaf structure at close range. However, given the small scale of the construction activities (significantly less than the 12,000m³ threshold for buildings that generate a 'small' effect), and the receptor being more than 50m from the construction works adjacent to the northern boundary of the site, the air quality/dust assessment has concluded that there would be a negligible effect associated with construction. Where electrical hookups have been installed in closer proximity, works of this nature are very unlikely to generate any notable dust that could affect adjacent receptors.
- 5.3.24 Consequently, the potential for significant adverse impacts on this and the more distant designated sites (River Avon and New Forest SAC) can be screened out.

Traffic – construction/demolition

- 5.3.25 Using the Design Manual for Roads and Bridges (DMRB) LA 105 – Air Quality, ecological receptors within 200 metres of a road are considered potentially sensitive to emissions, particularly nitrogen oxides (NO_x) and nitrogen deposition, which can affect sensitive vegetation communities such as ancient or semi-natural woodland.
- 5.3.26 However, under LA 105, detailed air quality assessment is only required where Heavy Duty Vehicle (HDV) flow increases by more than 200 AADT on roads within 200 metres of sensitive ecological sites.
- 5.3.27 In this case, proposed development traffic increases fall below the DMRB screening thresholds, and therefore no significant increase in airborne pollutants or nitrogen deposition is predicted during the temporary construction phase, meaning that the integrity of the Dorset Heathlands SAC will not be adversely impacted, and can be screened out of further assessment.
- 5.3.28 Consequently, the potential for significant adverse impacts the more distant designated sites (River Avon and New Forest SAC) can be screened out.

Traffic - Operational

- 5.3.29 There is potential for impacts to occur to the SPA and Ramsar via air quality impacts arising from the operational phase of the development via traffic emissions from additional vehicle traffic. For sensitive ecological receptors, the IAQM Guidance on the assessment of dust from demolition and construction sets out 200 m as the distance from the site boundary and from the site traffic route(s) within which there could potentially be nuisance dust and PM10 effects.
- 5.3.30 Using the Design Manual for Roads and Bridges (DMRB) LA 105 – Air Quality, ecological receptors within 200 metres of a road are considered potentially sensitive to emissions, particularly nitrogen oxides (NO_x) and nitrogen deposition, which can affect sensitive vegetation communities such as ancient or semi-natural woodland. However, under the guidance, a detailed air quality assessment is only required where the change in daily traffic exceeds 1,000 AADT (Annual Average Daily Traffic).
- 5.3.31 In this case, proposed development traffic increases fall below the DMRB screening thresholds, and therefore no significant increase in airborne pollutants or nitrogen deposition is predicted. The SPA is not designated for the presence of particularly sensitive plant assemblages (e.g. lichen-rich communities) and is considered to have a relatively low sensitivity to marginal increases in atmospheric pollutants. Consequently, the risk of air

quality impacts is considered negligible, and no significant effects are anticipated in this respect.

- 5.3.32 The potential for significant adverse impacts on the more distant designated sites (Avon Valley and New Forest SPA and Ramsar) can be screened out, as no roads fall within 20 0m of these sites.

Water quality

- 5.3.33 The quality of the water entering Natura 2000 and Ramsar sites is an important determinant of habitat condition and hence the species they support. Poor water quality can have a range of ecological impacts.
- 5.3.34 Likely significant effects on the Dorset Heathlands SAC cannot be excluded due to the close proximity of the nearest boundary to the development site (immediately adjacent to the southern boundary), and the number of nearby drainage ditches associated with this. As such, the issue of water quality is taken through to Stage 3 Appropriate Assessment as significant effects cannot be screened out for the Dorset Heathlands SAC.
- 5.3.35 For the more distant designated sites (New Forest and River Avon SAC), there is no direct linkage, and so, impacts arising from water quality on these designated sites can be screened out.

Hydrological changes

- 5.3.36 The site is not specifically linked to the Dorset Heathlands SAC albeit as it is immediately adjacent and so during the operational phase of the development, there is potential for surface water generated on-site to infiltrate into the underlying aquifer and subsequently enter the adjacent ditch network, which forms part of the Dorset Heathlands SAC.
- 5.3.37 Sustainable water management measures will be used to control the surface water runoff from the development Site, thereby managing the flood risk to the Site and surrounding areas from surface water runoff. These measures will also improve the quality of water discharged from the Site. According to the Flood Risk Assessment, filter Drains will form the main attenuation feature for both buildings positioned east and west.
- 5.3.38 All foul water from the site will be managed via a package treatment plant (PtP). This will be secured via a Unilateral Undertaking that all foul waste from the septic tank is to be discharged to Palmersford WRC. This will ensure that there is no impact on Nutrient Neutrality in the Avon, as Palmersford WRC discharges to The Stour. Therefore, impacts arising from hydrological changes can be screened out from further assessment for the Dorset Heathlands SAC.
- 5.3.39 The New Forest SPA and Ramsar is not considered to be susceptible to impacts arising from extra nutrient (nitrate / phosphate) impacts (New Forest District Council, 2024), and therefore, further assessment on this receptor from this pathway can be screened out.

Disturbance

- 5.3.40 Disturbance can be caused by visible activity (construction, operation or recreation), noise and lighting. Because of the relative complexity of these issues, they can have impacts on breeding and wintering birds within several hundred metres depending on the nature of the activity and the receptors.
- 5.3.41 The Dorset Heathlands SAC is designated for its internationally important lowland heathland habitats, including Northern Atlantic wet heaths with *Erica tetralix*, European dry heaths, depressions on peat substrates, and associated wetland features. These habitats support a range of rare and protected species, including GCN (which are a non-qualifying feature).

- 5.3.42 As the citation for the SAC refers to habitats (as opposed to species), such features are not susceptible to impacts from visual disturbance, lighting and noise. Therefore, impacts from these pathways can be screened out.
- 5.3.43 Given the proximity of the designated site to the development boundary; impacts arising from recreational disturbance cannot be ruled out at this stage and will therefore be taken through to an Appropriate Assessment.
- 5.3.44 Given the distances involved for the remaining SAC sites (being a minimum of 4.8km) impacts arising from disturbance can be screened out.

Introduction or spread of non-native invasive species

- 5.3.45 The movement of people and traffic, as well as importation of material and plants to a site, can result in the introduction of non-native species to a site. This is primarily an issue relating to protected habitats due to the ability of non-native species to alter habitat composition, leading to impaired species diversity. In extreme circumstances invasive species can also change habitat structure and food availability, issues of more immediate concern to protected bird assemblages.
- 5.3.46 A comprehensive UKHab and subsequent targeted botanical assessments were undertaken to identify the presence of non-native or invasive plant species within the application site (see Appendix 8.1).
- 5.3.47 Given the absence of invasive species at baseline, the risk of their introduction or spread as a result of the proposed development is considered to be low.
- 5.3.48 Importantly, construction workers and associated activities did not have access to the adjacent MoD land, which forms part of the Dorset Heathlands SPA/Ramsar site. This access restriction further reduces the risk of accidental transfer of non-native or invasive species into the designated site, ensuring robust biosecurity and protection of sensitive habitats.
- 5.3.49 The issue of introducing and spread of non-native species is therefore screened out from further consideration on the grounds of not likely having an adverse effect.
- 5.3.50 Given the distances involved for the remaining SAC sites (being a minimum of 4.8km) impacts arising from disturbance can be screened out.

6 Stage 3 – Appropriate Assessment

6.1.1 A summary of the outcomes of Stage 2 is presented below in **Table 6.1**, below.

Table 6.1: Summary of Stage 2 Conclusions – Gundry’s Farm

	Screening Outcome	Designated Site	Feature
Direct loss or damage of habitats used by interest species	No Likely Significant Effect		
Change in management regimes	No Likely Significant Effect		
Urbanisation	No Likely Significant Effect		
Air quality	No Likely Significant Effect		
Water quality	<i>Through to Stage 3</i>	Dorset Heaths SPA and Ramsar Dorset Heaths SAC	Wintering and breeding birds All features
Hydrological changes	No Likely Significant Effect		
Disturbance	<i>Through to Stage 3 (recreational disturbance, lighting or noise)</i> <i>Through to Stage 3 (recreational disturbance only)</i>	Dorset Heaths SPA and Ramsar Dorset Heaths SPA	Wintering and breeding birds All features
Introduction or spread of non-native invasives	No Likely Significant Effect		

Water Quality

6.1.2 Poor water quality can result in a range of impacts. These include:

- at high levels, toxic chemicals and metals can result in immediate death of aquatic life, and can have detrimental effects even at lower levels, including increased vulnerability to disease and changes in wildlife behaviour;
- some industrial chemicals and components of sewage effluent are suspected to interfere with the functioning of the endocrine system, possibly having negative effects on the reproduction and development of aquatic life; and
- eutrophication, the enrichment of plant nutrients in water, increases plant growth with high levels of macroalgal growth potentially smothering the mudflats used as feeding areas by qualifying bird species. The decomposition of organic matter that

often accompanies eutrophication can deoxygenate water. In the marine environment, nitrogen is the limiting plant nutrient and so eutrophication is associated with discharges containing available nitrogen.

- 6.1.3 During the operational phase of the development, there is potential for surface water generated on-site to infiltrate into the underlying aquifer and subsequently enter the adjacent ditch network, which forms part of the Dorset Heathlands SPA and Ramsar site.
- 6.1.4 The ongoing protection of water quality entering European sites is essential to maintain the ecological integrity of habitats that support qualifying species, including nightjar, Dartford warbler, merlin, woodlark, and hen harrier. These species depend on the preservation of specific heathland and wetland conditions, which can be adversely affected by pollutants such as hydrocarbons, heavy metals, nutrients, and organic matter (APEM, 2021; Environment Agency, 2022). Operational activities at caravan parks, including vehicle use, wastewater management, and routine maintenance, can pose risks of diffuse pollution, nutrient enrichment, and accidental spills if not properly managed.
- 6.1.5 Sustainable water management measures will be used to control the surface water runoff from the development Site, thereby managing the flood risk to the Site and surrounding areas from surface water runoff. These measures will also improve the quality of water discharged from the Site. According to the Flood Risk Assessment, filter Drains will form the main attenuation feature for both buildings positioned east and west.
- 6.1.6 All foul water from the site will be managed via a package treatment plant (PtP), which will be disposed of, off site, ensuring no untreated effluent enters the ditch network.
- 6.1.7 With these embedded mitigation measures, the risk of waterborne pollutants reaching the Dorset Heathlands SPA, SAC and Ramsar site during the operational phase is considered to be extremely low and screened out from causing a likely significant effect.

Disturbance

Lighting

- 6.1.8 Lighting during the construction, operational and demolition phases of the proposed development have the potential to disturb the qualifying species of the Dorset Heaths SPA and Ramsar, given that it is directly adjacent to the southern boundary of the site. Available research indicates that the introduction of lighting could potentially cause a disruption of nocturnal bird behaviour such as roosting and feeding.
- 6.1.9 No flood lighting was installed during the construction period and so effects arising from the construction period can be screened out.
- 6.1.10 During the operational phase, the potential for light pollution affecting the adjacent Dorset Heathlands SPA and Ramsar site has been carefully considered. The SPA supports internationally important populations of nightjar, Dartford warbler, merlin, woodlark, and hen harrier, several of which are nocturnal and are known to be sensitive to artificial light (Gaston et al., 2013; Stone et al., 2015).
- 6.1.11 Breeding bird surveys did not identify any citation bird species to be present within the application boundary, but four territories were present within the SPA (MoD) land, circa 150m south of the application boundary.
- 6.1.12 Noting the above, artificial lighting can alter natural patterns of darkness, potentially affecting the behaviour, breeding success, and foraging efficiency of sensitive bird species and their invertebrate prey (Longcore & Rich, 2004; Gaston et al., 2013). Nightjars, in particular, are vulnerable to increased illumination, which can disrupt their nocturnal activity and reduce habitat suitability (Murphy et al., 2012).

- 6.1.13 The operational design of the caravan park does not include any high-level or floodlighting. Any new lighting will be limited to low-level, downward-facing bollard lights for essential wayfinding and safety within the site. These luminaires will be fitted with shields and designed to emit minimal upward or horizontal light spill, in accordance with the Institution of Lighting Professionals' (ILP) Guidance Note 08/18: Bats and Artificial Lighting in the UK (ILP, 2018) and best practice for developments near sensitive ecological receptors (Stone et al., 2015).
- 6.1.14 Lighting will be positioned away from the southern and eastern site boundaries adjacent to the SPA and will be controlled by timers or motion sensors to ensure it is only operational when necessary. The lighting design will achieve an Environmental Zone E1 (intrinsically dark) classification at the SPA boundary, as defined by the ILP (2011), ensuring that illuminance levels at the SPA edge remain at or below 0.5 lux, which is considered negligible for ecological impact (ILP, 2018).
- 6.1.15 With these embedded design measures, the risk of operational-phase light pollution adversely affecting the citation features for the Dorset Heathlands SPA and Ramsar site is considered negligible.
- 6.1.16 Implementation of these measures during the construction and operational phase of the proposed development will ensure no adverse effect on site integrity of the Dorset Heaths SPA and Ramsar (nor their associated citation bird species)

Visual disturbance – Activity (Construction, Operation and Demolition)

- 6.1.17 High level visual disturbance might result in birds responding by major flight or, if they remain in the area, in the temporary cessation of foraging. Either of these responses might negatively affect the survival rates or breeding success of individual birds. Visual disturbance can be exacerbated by workers operating outside of equipment, moving fast, and using large machinery.
- 6.1.18 The SPA supports breeding populations of nightjar, Dartford warbler, woodlark, merlin, and hen harrier, with four nightjar territories recorded within the adjacent MoD land to the south (circa 150m from the application boundary). No citation species were recorded on site.
- 6.1.19 The movement of people and plant during the construction phase of the project would have been somewhat obscured by any citation species which may be present within the SPA / Ramsar; this is because a scattered mature treeline runs along the southern boundary, forming a barrier between the site and the MoD land. However, toward the west and in places along the south, there are some gaps, and so, it is possible that the (minimal) construction works would have been seen by bird species using the SPA / Ramsar.
- 6.1.20 However, the nightjar population circa 100 - 150m to the south are likely to already be habituated to a certain level of disturbance from people and vehicle movements, given that they were breeding within the MoD land, which has a series of roads running through it. From aerial imagery (Goggle Earth Pro), it can be seen that over the years, there have always been HGV's, cars and other machinery parked on site; and within a much closer vicinity that that which would have been present during the construction of the caravan park.
- 6.1.21 As the nightjar populations continue to nest within the MoD land, despite a wider variety of available heathland habitat being present within the local area, it is considered they are habituated to a certain level of disturbance.
- 6.1.22 Furthermore, literature has consistently evidenced that nightjar populations, where there is already some level of disturbance (i.e., footpaths etc) the largest reasoning for nest failure is predation (Langston, 2007); which is not an issue associated with construction.
- 6.1.23 During the operational phase, vehicle movements can cause disturbance to sensitive bird species through visual intrusion, particularly during the breeding season (March–August).

Nightjars are known to be sensitive to disturbance at nest sites, which can lead to reduced breeding success or territory abandonment if disturbance is frequent or intense (Liley & Clarke, 2003; Langston et al., 2007). However, evidence suggests that nightjars and other heathland birds can exhibit a degree of habituation to regular, predictable human activity, especially in areas with a history of disturbance such as MoD training grounds (Murison, 2002; Clarke et al., 2006).

- 6.1.24 The MoD land immediately south of the site is likely subject to some level of ongoing military activity, including vehicle movements. Nightjar territories have been recorded within this area, indicating that local populations are likely already exposed to, and at least partially habituated to, a baseline level of anthropogenic disturbance. Studies have shown that nightjars can persist and breed successfully in areas with regular vehicle and human activity, provided that disturbance is not abrupt, unpredictable, or directly targeted at nest sites (Clarke et al., 2006; Langston et al., 2007).
- 6.1.25 The operational design of the caravan park incorporates several measures to minimise potential disturbance from vehicle movements. Internal roads are located away from the SPA boundary where possible, and speed limits and traffic calming features will be implemented to reduce this further. In addition, planting along the southern boundary will include a native hedgerow, native trees, and scrub, which, as it matures, will provide another level of protection with regards to a visual buffer between the site and the SPA / Ramsar.
- 6.1.26 With the above mitigation measures and considering the existing habituation of local bird populations to MoD-related disturbance, the risk of significant operational-phase disturbance from vehicle movements is considered low.
- 6.1.27 Based on the above, this issue is not expected to compromise the conservation objectives of the Dorset Heaths SPA / SAC / Ramsar, and no adverse effect is predicted.

Noise – Construction

- 6.1.28 Construction activities, including HGV movements and general site operations, have the potential to generate noise that could disturb breeding birds within the adjacent Dorset Heathlands SPA and Ramsar site, potentially causing temporary displacement or altered feeding and breeding behaviour. However, it is important to note that the SPA/Ramsar site is adjacent to active Ministry of Defence (MoD) land, where a baseline level of noise and disturbance is already present due to ongoing activities. Research (Liley et al., 2009; Cutts et al., 2009) indicates that bird populations in such environments often exhibit a degree of habituation to regular, non-threatening noise sources.
- 6.1.29 The construction works did not include any high-intensity noise-generating activities such as impact piling, which further reduces the risk of disturbance. Given the combination of noise being non-threatening (percussive), existing background noise from MoD operations, and the presence of the mature-tree line also acting as a small buffer, any incremental noise generated by the proposed construction is assumed to have been well below thresholds known to cause significant disturbance to SPA-cited bird species (Cutts et al., 2009; Natural England, 2014).
- 6.1.30 Based on the above, this issue is not expected to compromise the conservation objectives of the Dorset Heaths SPA / SAC / Ramsar, and no adverse effect is predicted.

Noise - Operation

- 6.1.31 During the operational phase, the principal source of noise will be the routine comings and goings of vehicles associated with residents, visitors, and site management. The Dorset Heathlands SPA and Ramsar site, immediately to the south, supports four nightjar territories (RPS, 2025), whilst the wider SPA citation also includes Dartford warbler, woodlark, merlin, and hen harrier, albeit none of these were identified during the survey work in 2025.

- 6.1.32 Research indicates that anthropogenic noise can affect bird behaviour, territory selection, and breeding success, particularly for ground-nesting species such as nightjar and woodlark (Reijnen et al., 1995; Cutts et al., 2013). However, the magnitude of impact is highly dependent on the intensity, frequency, and predictability of the noise source, as well as the degree of habituation of local bird populations (Langston et al., 2007; Clarke et al., 2006).
- 6.1.33 There is a presumption against development (residential or tourism) within 400m of the SPA, due to bird disturbance impacts (noise etc). However, it is important to note that the only SPA parcel within 400m of the application site is the MoD land, immediately south; which is already subject to ongoing military activity, including vehicle movements and a certain level of operational noise. Nightjar territories have been recorded within this MoD land, indicating that local populations are already exposed to, and at least partially habituated to, a baseline level of anthropogenic noise and disturbance (Murison, 2002; Clarke et al., 2006). Case studies from similar heathland environments show that nightjars and other SPA species can persist and breed successfully in areas with regular, predictable vehicle and human activity, provided that noise levels do not exceed critical thresholds or occur during sensitive periods (Clarke et al., 2006; Langston et al., 2007).
- 6.1.34 The anticipated operational noise from the caravan park is expected to be low-level and intermittent, primarily associated with cars arriving and departing, and will be largely confined to daylight hours. No amplified music, public address systems, or other significant noise sources are proposed. The internal layout of the park will direct vehicle movements away from the SPA boundary where possible, and speed limits and traffic calming measures will further reduce noise levels.
- 6.1.35 With these embedded design and management measures and considering the existing habituation of local bird populations to MoD-related noise, the risk of significant operational-phase noise disturbance to SPA citation species is considered low.
- 6.1.36 It will furthermore it is highly unlikely that the Proposed Development will result in noise levels of greater than 55dBLAmax within the SPA / Ramsar sites (which is considered to be the threshold above which impacts should be considered).
- 6.1.37 On this basis, therefore, it can be stated that the issue of operational noise-related disturbance will not compromise the objectives of the SPA / Ramsar sites.

Recreational Disturbance – Construction and Operational

- 6.1.38 The Dorset Heaths SPA and Ramsar designated for the bird assemblages (wintering and breeding) that they support.
- 6.1.39 The Dorset Heaths SAC is primarily designated for the wet and dry heathlands.
- 6.1.40 The effect of increases in recreational activity on the Dorset Heaths SPA, SAC and Ramsar have been studied and identified within the Site Improvement Plan (SIP) for the Improvement Programme for England's Natura 2000 sites (IPENS). Impacts may occur due to, for example:
- Direct disturbance/damage to nests by walkers/dogs;
 - General disturbance to habitats;
 - Disturbance of birds using nests by humans/dogs such that birds abandon the nests;
 - Disturbance of birds from recreational activities including bird watching etc.
- 6.1.41 No evidence was found of SPA citation species using the application site or its immediate surrounds (50m buffer), nor is the site considered functionally linked land (i.e., land outside the SPA that supports the ecological requirements of the qualifying species. Therefore, it is

not expected that the presence of construction workers in the area would have provided additional recreational pressure sufficient to cause any perceptible impact.

- 6.1.42 Disturbance from people directly on the Dorset Heaths SPA, Ramsar and SAC is likely to be the most damaging to the bird species of interest, because the disturbance is intensified by its close proximity to the birds and frequency. The two main groups of visitors to the sites likely to cause disturbance are walkers and dog walkers, because of the nature of their activities and the frequency with which they visit the area.
- 6.1.43 Some research indicates that people with dogs can have a greater impact on birds than people walking without dogs, especially where dog walkers let their dogs off the lead.
- 6.1.44 Disturbance causes stress to birds, regular fleeing adds to energy expenditure, increases competition on the less disturbed mudflats and intertidal areas, and reduces the amount of time an adult bird spends at its nest. Increased time away from the nest can affect nesting success, through the nest being more frequently exposed to predators, a reduction in the amount of time eggs is incubated and a reduction in the amount of food being brought to chicks. Disturbance can also cause delays to the start of breeding and thus the number of broods that could be raised in any one season. Ultimately, this can result in increased mortality rates for designated species.
- 6.1.45 There is a presumption against development (residential or tourism) within 400m of the SPA, due to bird disturbance impacts (noise etc). However, it is important to note that the only SPA parcel within 400m of the application site is the MoD land; which is not accessible to the public for recreation. As a result, there is no direct pathway for recreational access from the caravan park into the SPA at this location. Evidence from visitor surveys and access studies (Liley et al., 2009; Footprint Ecology, 2018) demonstrates that recreational pressure on heathlands is strongly linked to the proximity and accessibility of public access points, with the vast majority of visits occurring within 400–500m of available access (hence the above presumption against development within this buffer).
- 6.1.46 The development will also utilise an area of land to the west of the scheme (under the ownership of the applicant) to create a Suitable Alternative Natural Greenspace (SANG).
- 6.1.47 In accordance with the Dorset Heathlands Planning Framework and local plan policies (e.g., Policy ME2, Christchurch and East Dorset Core Strategy 2014), the development will contribute to the Heathland Infrastructure Project (HIP). This strategic mitigation scheme funds the provision of Suitable Alternative Natural Greenspace (SANG), wardening, education, and access management measures to divert recreational use away from sensitive heathland sites and minimise disturbance to qualifying species (Dorset Council, 2023). The effectiveness of the HIP and SANG approach in reducing recreational pressure on European sites is well established, and many studies (Liley et al., 2009; Lake et al., 2019; Dorset Council, 2023). demonstrate that with ongoing monitoring of the HIP, such schemes are effective in safeguarding SPA bird populations from recreational disturbance.
- 6.1.48 With these embedded mitigation measures and given the absence of public access to the adjacent SPA parcel, the risk of significant operational-phase recreational disturbance to the Dorset Heathlands SPA and Ramsar site is considered negligible.
- 6.1.49 In summary, although the site is adjacent to the Dorset Heaths designations, the immediate MoD parcel is inaccessible, and the nearest accessible heathland is c.1.6 km away. By contributing to and engaging with the Dorset Heathlands SAMM/HIP programme and, where appropriate, providing or funding SANG-style alternative greenspace, and by securing delivery and monitoring through a legal agreement, the development will ensure strategic mitigation is in place to avoid adverse effects on the integrity of the Dorset Heaths SPA, SAC and Ramsar.
- 6.1.50 Therefore, a conclusion of no adverse effect on the integrity of the SPA/Ramsar/SAC can be reached.

6.2 Conclusion

6.2.1 Following the Appropriate Assessment provided above, and provision of mitigation measures as appropriate, it is concluded that the Proposed Development will not compromise the conservation objectives of Natura 2000 sites, and there will be no adverse effect on site integrity.

Table 6.2: Summary of Conclusions- Gundrys Farm

Feature	Activity	Likely Significant Effect Stage 2 Screening Assessment	No Adverse Effect Conclusion of Appropriate Assessment (Stage 3)
Dorset Heaths SPA, Ramsar and SAC	Direct loss or damage of habitats used by interest species	No likely significant effect	No adverse effect
	Change in Management Regime	No likely significant effect	No adverse effect
	Loss of future space to allow for managed realignment	No likely significant effect	No adverse effect
	Air quality (construction/demolition dust)	No likely significant effect	No adverse effect
	Air quality (traffic emissions)	No likely significant effect	No adverse effect
	Water Quality	Taken through to Stage 3 (Appropriate Assessment)	No adverse effect
	Hydrology/drainage	No likely significant effect	No adverse effect
	Disturbance from people and plant movements	Taken through to Stage 3 (Appropriate Assessment) SPA and Ramsar only	No adverse effect
	Disturbance (all pathways)	Taken through to Stage 3 (Appropriate Assessment)	No adverse effect
	Noise	Taken through to Stage 3 (Appropriate Assessment) SPA and Ramsar only	No adverse effect
	Lighting	Taken through to Stage 3 (Appropriate Assessment)	No adverse effect

HABITAT REGULATIONS ASSESSMENT

Feature	Activity	Likely Significant Effect Stage 2 Screening Assessment	No Adverse Effect Conclusion of Appropriate Assessment (Stage 3)
Assessment) SPA and Ramsar only			
	Introduction or spread of invasive species	No likely significant effect	No adverse effect
New Forest SPA and SAC	Direct loss or damage of habitats used by interest species	No likely significant effect	No adverse effect
	Change in Management Regime	No likely significant effect	No adverse effect
	Loss of future space to allow for managed realignment	No likely significant effect	No adverse effect
	Air quality (construction/demolition dust)	No likely significant effect	No adverse effect
	Air quality (traffic emissions)	No likely significant effect	No adverse effect
	Water Quality	No likely significant effect	No adverse effect
	Hydrology/drainage	No likely significant effect	No adverse effect
	Disturbance from people and plant movements	No likely significant effect	No adverse effect
	Disturbance (all pathways)	No likely significant effect	No adverse effect
River Avon SAC / Avon Valley SPA	Direct loss or damage of habitats used by interest species	No likely significant effect	No adverse effect
	Change in Management Regime	No likely significant effect	No adverse effect
	Loss of future space to allow for managed realignment	No likely significant effect	No adverse effect
	Air quality (construction/demolition dust)	No likely significant effect	No adverse effect

HABITAT REGULATIONS ASSESSMENT

Feature	Activity	Likely Significant Effect Stage 2 Screening Assessment	No Adverse Effect Conclusion of Appropriate Assessment (Stage 3)
	Air quality (traffic emissions)	No likely significant effect	No adverse effect
	Water Quality	No likely significant effect	No adverse effect
	Hydrology/drainage	No likely significant effect	No adverse effect
	Disturbance from people and plant movements	No likely significant effect	No adverse effect
	Disturbance (all pathways)	No likely significant effect	No adverse effect

7 Stage 4 – In-combination Assessment

- 7.1.1 Article 6(3) of the Habitats Directive requires that, prior to granting consent, a competent authority has to be satisfied that a plan or project will not have a significant adverse effect on the integrity of Natura 2000 sites either alone or in combination with other plans or projects. Therefore, this section of the HRA requires the consideration of the potential for such in combination effects with other plans or projects in the area.
- 7.1.2 Given the distance from the application site to the surrounding Natura 2000 sites, there are no pathways for effects to occur in combination with other plans or projects as a result of:
- Change in management regimes of habitats within a designated site or of nearby areas used by interest species;
 - Air quality;
 - Disturbance from people and plant movements; and
 - Disturbance (activity, noise and lighting).
- 7.1.3 The only potential effects that could occur in combination with other plans or projects would be via hydrological changes and recreational disturbance.
- 7.1.4 All of the identified schemes are either renewable energy projects (solar farms and battery energy storage) or employment/industrial developments and are located at least 1 km from the application boundary. There are no continuous or significant green corridors, drainage channels, or other ecological linkages connecting the application site to these developments that would enable direct movement of habitats or species between them. As a result, there is no realistic pathway for cumulative effects to occur in relation to: habitat loss or fragmentation, drainage or water quality impacts, light spill, noise, overshadowing / intervisibility, introduction or spread of non-native species, or visual disturbance from people and plant.
- 7.1.5 Moreover, the types of development involved do not generate recreational pressure on natural receptors (solar farms and BESS sites do not create new recreation demand and the employment/industrial units are not recreational destinations). Therefore, there is no plausible mechanism by which these schemes would combine to cause additional recreational disturbance to ecological or landscape receptors at the application site.
- 7.1.6 With respect to air quality operational emissions, there is no foreseeable cumulative impact. Operational emissions from the majority of the listed developments are negligible or non-existent (solar arrays and the BESS produce no ongoing combustion emissions), and any industrial/employment uses would be subject to separate planning controls, mitigation and emissions limits.
- 7.1.7 Construction phase emissions (dust and vehicle exhausts) from the schemes are temporary, localised and dispersed in time and space given the projects' differing consent and construction timetables; they would therefore not combine to create a sustained, measurable adverse air quality effect at the application site.
- 7.1.8 Traffic-related air quality effects have been considered through transport assessments for the relevant schemes and, given the minimum 1 km separation and the absence of shared sensitive receptors or constrained links between sites, there is no credible scenario in which traffic from these developments would interact cumulatively to produce an exceedance of air quality objectives at the application site.
- 7.1.9 In summary, having regard to the separation distances, the nature of the developments, the lack of ecological or hydrological linkages, and the limited and temporary nature of any construction emissions, there are no reasonable pathways by which the identified projects would combine with the proposed development to give rise to significant cumulative effects.

Figures

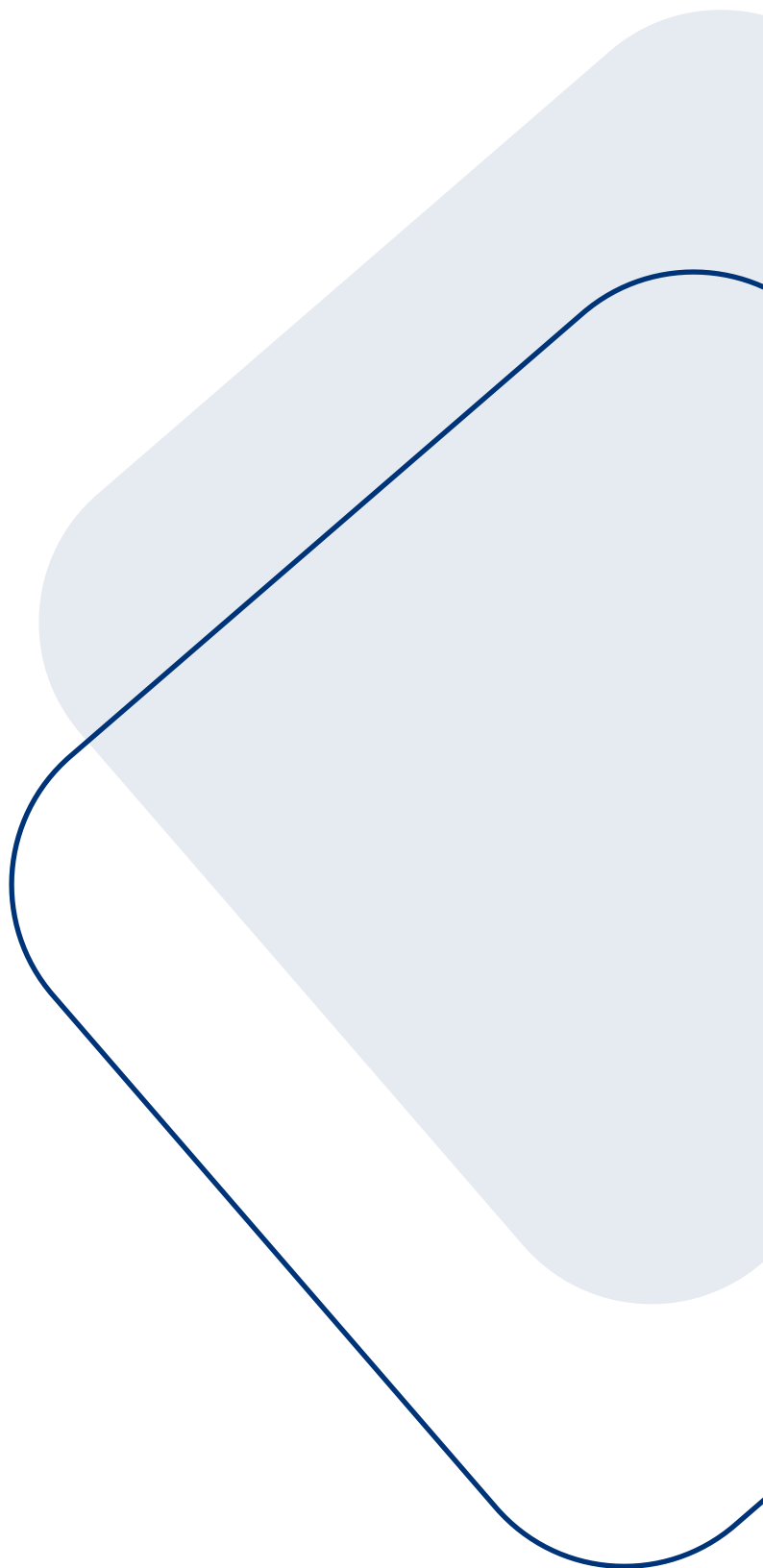


Figure 1: Location of Designated Sites with 10km of the Site