

Appendix 6

Addendum to Habitats Regulations Assessment of the Monmouthshire Replacement Local Development Plan

Impacts on Wye Valley & Forest of Dean Bat Sites SAC

Monmouthshire Council

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1. Background

Introduction

AECOM was appointed by Monmouthshire County Council (MCC) to undertake a Habitats Regulations Assessment (HRA) of its Replacement Local Development Plan (RLDP). The objective of this assessment was to identify any aspects of the Plan that would cause an adverse effect on the integrity of Habitats Sites, otherwise known as European sites; Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and, as a matter of Government policy, Ramsar sites, either in isolation or in-combination with other plans and projects, and to advise on appropriate policy mechanisms for delivering mitigation where such effects are identified.

In the RLDP HRA¹, there was an assessment of the impacts of five allocated sites, on Wye Valley & Forest of Dean Bat Sites SAC, through impacts on functionally linked habitat. However, as a result of the Deposit Plan consultation, Natural Resources Wales (NRW) asked for a more detailed assessment to be provided. Specifically, they asked for *‘the HRA to quantify the impact of this loss of land within the context of the current condition of the SAC and its conservation objectives. One such objective in the core management plan is to maintain or improve the quality of grazed pasture around and between areas identified as being used by the bats’*.

This addendum to the Deposit Plan HRA assessment presents an assessment of habitat and bat survey reports prepared for candidate sites and other available data. This includes protected site condition and radio tracking assessments for the six proposed site allocations within the Deposit Plan (those in Table 7 of the HRA for the Replacement Local Development Plan) and for site HA6 Land at Rockfield Road. This data is used to assess the impact of loss of functionally linked land through the allocation of sites within the context of the current condition of the Wye Valley & Forest of Dean Bat Sites SAC and its conservation objectives.

Table 1. Local Plan Allocations within 3km of Wye Valley and Forest of Dean Bat Sites SAC

Policy	Settlement	Site_Name	Units	Area (ha)	Distance to nearest SAC unit
HA8	Monmouth	Land at Tudor Road, Wyesham, Monmouth	50	2.1	1.4km
EA1	Monmouth	Poultry Units, Rockfield Road, Monmouth	N/A	1.3	1.7km
HA4	Monmouth	Land at Leasbrook, Monmouth	270	12.5	1km
HA13	St Arvans	Land adjacent to Piercefield Public House, St Arvans	16	1.1	2.7
HA18	Shirenewton	Land west of Redd Landes, Shirenewton	26	1.2	0.7km
HA6	Monmouth	Land at Rockfield Road	60	1.5	2.7km

2. Designated Habitats Sites

Wye Valley and Forest of Dean Bat Sites SAC

Introduction

The Wye Valley and Forest of Dean Bat Sites SAC lie within the Forest of Dean and Lower Wye National Character Area, straddling the England-Wales border. It includes 13 individual component

¹ Habitats Regulations Assessment of the Monmouthshire Replacement Local Development Plan, AECOM (2024)

sites (9 in England and 4 in Wales), all individually notified as Sites of Special Scientific Interest (SSSIs), totalling 144.82ha. The sites include maternity roosts and hibernation sites in old buildings and mines/caves.

The wider surrounding landscape of the SAC is heavily wooded and edged by predominantly grazed farmland. This mixed landscape with trees and grazed pastures provides good conditions for both lesser horseshoe bat *Rhinolophus hipposideros* and greater horseshoe bat *Rhinolophus ferrumequinum*. The designated SAC components harbour the highest density of lesser horseshoe bats in the UK, making up about 26% of the national population. The complex of sites harbours approximately 6% of the national greater horseshoe bat population.

The qualifying bat populations are supported by numerous summer roosts and hibernation sites in areas that are not designated but form part of the wider ecological network of the SAC. Flight lines, commuting routes and feeding grounds are also critical in maintaining the integrity of the Wye Valley and Forest of Dean Bat Sites SAC. Additionally, there is some evidence of connectivity between the populations in the SAC, the Cotswolds to the east, the Malvern Hills to the north and areas in Wales to the west. The SAC lies in various places along the eastern boundary of Monmouthshire.

Qualifying Features²

Annex II species that are a primary reason for the selection of this site

- Lesser horseshoe bat
- Greater horseshoe bat

The SAC features for each of the Welsh component SSSI sites are listed below. Wye Valley Lesser Horseshoe Bats SSSI consists of four management units which are listed separately in the table below.

Underpinning SSSI	Management Unit	SAC Features	Condition Assessment
Llangovan Church		Lesser Horseshoe Bat	Favourable Maintained
Mwyngloddfa Mynydd-bach SSSI		Lesser Horseshoe Bat	Favourable Maintained
Newton Court Stable Block		Greater Horseshoe Bat	Favourable
Wye Valley Lesser Horseshoe Bat Sites	Itton Court Stud	Lesser Horseshoe Bat	Favourable Maintained
	Penallt Old Church	Lesser Horseshoe Bat	Unfavourable Declining
	The Priory, Llandogo	Lesser Horseshoe Bat	Favourable Maintained
	Tregeiriog Farm	Lesser Horseshoe Bat	Unfavourable Declining

² <https://sac.jncc.gov.uk/site/UK0014794>

Conservation Objectives³

Conservation Objective for Feature 1: Greater Horseshoe Bat

The vision for this feature is for it to be in a favourable conservation status, where all of the following conditions are satisfied:

- The site will support a sustainable population of greater horseshoe bats in the Wye Valley area.
- The population will be viable in the long term, acknowledging the population fluctuations of the species.
- Buildings, structures and habitats on the site will be in optimal condition to support the populations.
- Sufficient foraging habitat is available, in which factors such as disturbance, interruption to flight lines, and mortality from predation or vehicle collision, changes in habitat management that would reduce the available food source are not at levels which could cause any decline in population size or range
- Management of the surrounding habitats is of the appropriate type and sufficiently secure to ensure there is likely to be no reduction in population size or range, nor any decline in the extent or quality of breeding, foraging or hibernating habitat.
- There will be no loss or decline in the quality of linear features (such as hedgerows and tree lines) which the bats use as flight lines
- There will be no loss of foraging habitat use by the bats or decline in its quality, such as due to over-intensive woodland management
- All factors affecting the achievement of the foregoing conditions are under control.

Conservation Objective for Feature 2: Lesser Horseshoe Bat

The vision for this feature is for it to be in a favourable conservation status, where all of the following conditions are satisfied:

- The site will support a sustainable population of lesser horseshoe bats in the Wye Valley area.
- The population will be viable in the long term, acknowledging the population fluctuations of the species.
- Buildings, structures and habitats on the site will be in optimal condition to support the populations.
- Sufficient foraging habitat is available, in which factors such as disturbance, interruption to flight lines, and mortality from predation or vehicle collision, changes in habitat management that would reduce the available food source are not at levels which could cause any decline in population size or range.
- Management of the surrounding habitats is of the appropriate type and sufficiently secure to ensure there is likely to be no reduction in population size or range, nor any decline in the extent or quality of breeding, foraging or hibernating habitat.
- There will be no loss or decline in the quality of linear features (such as hedgerows and tree lines) which the bats use as flight lines
- There will be no loss of foraging habitat use by the bats or decline in its quality, such as due to over-intensive woodland management.
- All factors affecting the achievement of the foregoing conditions are under control.

³ [Wye Valley Bats Core Plan TRK 31 Oct 07_A](#)

Threats and Pressures to Site Integrity⁴

The following threats and pressures to the site integrity of the Wye Valley and Forest of Dean Bat Sites SAC have been identified in Natural England's Site Improvement Plan (SIP):

- Physical modification
- Public access/disturbance
- Habitat connectivity

Monitoring

Monitoring data for the Welsh management units of this SAC from the National Bat Monitoring Programme has been included below. Hibernation monitoring of Mwyngloddfa Mynydd-bach SSSI has not been undertaken for over 10 years due to health and safety concerns, and as such is not included in the table below. Prior to this bat numbers at Mwyngloddfa Mynydd-bach SSSI were approximately 117.

Underpinning SSSI	Associated NBMP	Species	Peak Count	Average annual percentage change
Llangovan Church	St Govan's Church, Llangovan	Lesser Horseshoe Bat	259	3.1
Newton Court Stable Block	Newton Court	Greater Horseshoe Bat	235	4.8
Wye Valley Lesser Horseshoe Bat	Itton Court (Wye Valley SSSI)	Lesser Horseshoe Bat	416	6.2
	Llandogo Priory	Lesser Horseshoe Bat	1082	2.6
	Penallt Old Church (Wye Valley SSSI)	Lesser Horseshoe Bat	468	0.6
	Tregeiriog Farm (Wye Valley SSSI)	Lesser Horseshoe Bat	125	2

Sustenance Zones

A Core Sustenance Zone (CSZ) is "the area surrounding a communal roost within which habitat availability and quality will have a significant impact on the resilience and conservation status of the colony using the roost" (Bat Conservation Trust)⁵. The Bat Conservation Trust indicate that UK studies have identified a typical CSZ for Greater Horseshoes of 3km around a roost, and a typical CSZ for Lesser Horseshoe bats of 2km around a roost. It is understood that Natural England and Natural Resources Wales are still evaluating the appropriate size for CSZs for Greater and Lesser Horseshoe bats at Wye Valley and Forest of Dean Bat Sites SAC; in lieu of specific CSZs the typical figures provided by the Bat Conservation Trust have been used in this report.

Studies at other designated habitat sites have also identified that habitats within 1km of a Greater Horseshoe maternity roost are of particular importance for the survival of juvenile bats, as they are less able to fly and therefore more reliant on the immediate area for feeding. These areas are termed 'Juvenile Sustenance Zones' (JSZ)⁶.

⁴ <http://publications.naturalengland.org.uk/publication/6102625057505280>

⁵ Core Sustenance Zones - Landscapes for Bats - Bat Conservation Trust

⁶ See North Somerset and Mendip Bats Special Area of Conservation (SAC) Guidance on Development: Supplementary Planning Document Adopted January 2018 <https://www.n-somerset.gov.uk/sites/default/files/2020-02/NSC%20and%20Mendip%20Bats%20SAC%20guidance%20-%20supplementary%20planning%20document.pdf>

Two radio tracking studies have been undertaken of bats from Newton Court Stable Block. The 2004 study had concluded that the majority of bats travelled northwards and westwards from the roost although some were also recorded to the south. Favoured foraging areas included treelined watercourses and tracks, bushy hedgerows, cattle/sheep/horse grazed pasture, broadleaved woodland edge, gardens and orchards and unimproved grassland. In this study 13 foraging areas were identified with the most significant being approximately 4km north of the roost.

Radio tracking of ten greater horseshoe bats at Newton Court Stable Block was undertaken in 2019 by Greena Ecological Consultancy, on behalf of Natural Resources Wales. This study aimed to provide updated information on the current status of the greater horseshoe bat population roosting at Newton Court Stable Block SSSI and on the foraging areas, commuting routes as well as the core sustenance zone to inform future conservation actions.

The 2019 study concluded that landscapes supporting highly connected and structured semi-open habitats (i.e. a mixture of pasture, hay meadows and broadleaf woodland connected with hedgerows and tree lines) are the most favourable for greater horseshoe bats. Greater horseshoe bats were found to forage mainly over / around pasture (41.8% of all recorded time), followed by 26.5% of all time in woodland or along tree lines and 16.6% of time over amenity vegetation represented mainly by golf courses and cemeteries.

This study found that the **overall foraging area** used by these bats, based on the recorded locations of bats and increased to account for potential inaccuracies in monitoring data, extended 5984.8ha between Llancloudy in the north, Ganarew in the east, Mitchel Troy Common in the south and Crossway in the west. Additionally, a **core foraging area** of 2799.5ha was defined by identifying the area within which 50% of the registrations occurred (the 50% kernel contour line), covering the area to the north and north-west of the maternity roost. Several commuting routes were also identified by this study, however it is noted that additional commuting routes could be present however signal may have been blocked whilst tracking. The report recommends key conservation measures be implemented for important foraging areas including continuing grazing by livestock, preservation of the existing wooded areas and hedgerows and regulated, directional and capped lighting where external artificial lighting is required.

3. Land at Tudor Road, Wyesham, Monmouth

Site Background

The Tudor Road Site is located approximately 1.4km from Penallt Old Church (Part of Wye Valley Lesser Horseshoe Bat Sites SSSI) and 2.1km from Newton Court Stable Block SSSI, component roosts of Wye Valley and Forest of Dean Bat Sites SAC. The RLDP seeks to rollover the allocation of the adopted Local Development to deliver the development of approximately 50 homes at the Site.

A planning application was approved March 2025 subject to Section 106 agreement for the Tudor Road Site (DM/2024/00557). The approved development comprises 50 affordable dwellings, highway works, landscaping, open space provision, car parking, sustainable drainage, and associated works. A HRA was undertaken for the planning application; it was concluded that the project will not adversely affect the integrity of the protected sites, subject to additional mitigation measures secured by conditions for landscape buffer with long-term management and a sensitive lighting strategy. NRW agreed with the conclusions of the HRA.

The site is species-poor semi-improved grassland, which has had no recent management.

Survey History

The most recent habitat survey of the Tudor Road Site was conducted on 13 June 2023. This survey found that the Site comprised two poor semi-improved grassland fields separated by a defunct treeline. The Site's northern boundary was delineated by a semi-mature tree line/hedgerow located

atop an earth bank which sloped southwards into the Site. A derelict building was present on the boundary between the two fields, surrounded by scrub and tall ruderal vegetation. The western boundary was defined by scrub and unvegetated fence lines, whilst the southern and eastern boundaries were delineated by semi-mature trees and scrub.

During the habitat survey, six trees with the potential to support roosting bats and a derelict building with low suitability to support crevice-dwelling bats were identified. With respect to foraging/commuting bat assemblages, native hedgerows and mature trees along the northern boundary of the Tudor Road Site provided a strong linear feature for the dispersal of bats between the Site and the wider landscape. The eastern, southern and western boundaries similarly provided suitable linear features. However, these were likely to be subject to some lighting effects arising from existing development and were of varying quality, being dominated by species-poor scrub and tall ruderal vegetation, interspersed by sections of non-native hedgerows and unvegetated wall/fence lines.

A desk study undertaken in June 2023 returned records of lesser horseshoe bats within 2km of the Site. Nine records of horseshoe bat roosts were returned, the nearest being 730m north-west of the Site. This included two maternity roosts, the nearest of which was located 1.45km south of the Site.

Due to the habitats present on the Site, bat activity surveys and the deployment of static bat detectors were undertaken between June and September 2023; to determine the use of the Site by foraging and commuting bats. A total of nine bat species/species groups were confirmed present foraging and/or commuting within the Site during the automated detector surveys. Greater horseshoes were recorded in all months on at least three nights out of five, except for October when only one night of activity was recorded. The peak of activity was in August; greater horseshoes were recorded on all nights on the northern boundary with a peak count of 19 passes, and four nights on the southern boundary with a peak count of 11 passes. Lesser horseshoe bats were also recorded in all months but at lower levels. The number of passes recorded ranged between one and four passes every night on each survey visit at each location, with one exception when no activity was recorded on the northern boundary on one night. Other bats present which add to the assemblage of bats recorded are; common pipistrelle, soprano pipistrelle, noctule, serotine, myotis sp., Leisler's bat, long-eared bat, barbastelle.

The Site at Tudor Road did not fall in the core foraging area for greater horseshoe bats from Newton Court Stable Block SSSI identified by the unpublished NRW radio-tracking study, and none of the confirmed commuting lines intersected with the Tudor Road Site.

Assessment

Potential Impact Pathways

Conservation objectives relevant to this proposed allocation site include:

- Sufficient foraging habitat being available
- Management of the surrounding habitats being of the appropriate type and sufficiently secure to ensure there is likely to be no reduction in population size or range, nor any decline in the extent or quality of breeding, foraging or hibernating habitat.
- No loss or decline in the quality of linear features (such as hedgerows and tree lines) which the bats use as flight lines
- No loss of foraging habitat used by the bats or decline in its quality, such as due to over-intensive woodland management

This Site falls within the aforementioned 2km CSZ for lesser horseshoe bats as the Penallt Old Church component of the SAC is designated for this species and lies 1.4km from the site. In addition, Newton Court Stable Block SSSI is located 2.1km from the site and is designated for greater horseshoe bats. This means that the site falls within the 3km CSZ for Greater Horseshoe bats using this component of the SSSI.

The site primarily comprises species poor semi-improved grassland. While cattle-grazed pasture is suitable for foraging bats, this grassland is not grazed or actively managed and therefore is less suitable for foraging horseshoe bats.

The site contains hedgerows and linear features which may be utilised by commuting bats and development may lead to disruption of this via habitat loss or disturbance due to light spillage.

Description of Impacts

The Tudor Road Site covers 0.17% of the CSZ for lesser horseshoe bats from Penallt Old Church (part of Wye Valley Lesser Horseshoe Bat Sites SSSI) and 0.07% of the CSZ for greater horseshoe bats from Newton Court Stable Block SSSI. The radio tracking data of greater horseshoe bats showed that the Tudor Road Site did not fall in the core foraging area of these bats and did not intersect with confirmed commuting lines. The Tudor Road Site does fall within the overall foraging area identified by this tracking. The overall foraging area covers 5,984.8ha, of which the Site covers 2.1ha, thus comprising less than 0.04% of this overall foraging area.

From the surveys undertaken at the Tudor Road Site, with the exception of the northern boundary, it was concluded that usage of the Site by horseshoe bats was low. The hedgerows present on the Site may provide a useful route for commuting bats.

Description of Mitigation Measures

Several policies within the RLDP provide a policy framework to mitigate the impact of any development on the interest features of Wye Valley and Forest of Dean Bat Sites SAC.

Strategic Policy S8 includes requirements for all residential site allocations to:

- Make provision within the development for appropriate green infrastructure...
- Demonstrate a proposal that is informed by the surrounding landscape character and reflects the distinctive landscape character, qualities and sensitivities of the area.
- Take a proactive approach to deliver a net benefit for biodiversity and ecosystem resilience within the development site by maintaining, incorporating and enhancing semi-natural habitats and ecological connectivity between them.
- Ensure the protection and enhancement of biodiversity through appropriate building design, site layouts, lighting proposals that retain dark corridors, landscaping techniques and choice of plant species.
- Ensure that trees, woodland and hedgerows along site boundaries and within the site are retained and protected as far as possible with adequate space to allow access for maintenance and to maintain functional and viable wildlife corridors and green infrastructure assets.

Policy NR1 requires development proposals to assess the impact on locally designated sites, including functionally linked land and make appropriate provisions. Supporting text adds that *'Any development proposal that could have a significant effect on the integrity of a SAC, SPA or Ramsar site will not be in accordance with the development plan. This also applies to Functionally Linked Land, which is defined as habitat outside the designated site boundary that is fundamental to the ability of the designations to reach their Conservation Objectives. The parameters for this being specific to each designated site'*.

Policy GI2 requires development to protect trees, woodland and hedgerows, with any required removal to be agreed upon and replaced with suitable levels of replacement planting.

Policy LC5 requires development to minimise light spillage and potential adverse effects on biodiversity for any outdoor lighting. Site specific mitigation is secured via site specific requirements within Policy HA18. Of note are the requirements for existing boundary features to be enhanced with additional hedgerow and tree planting to boundaries, and the requirement for a lighting strategy that minimises light spillage on to wildlife corridors and habitats.

In light of these policies, it is considered that the conservation status of local bat populations is unlikely to be adversely affected by the development of the Tudor Road Site in line with RLDP

policies. Therefore, it is considered that the RLDP provides a sufficient policy framework to ensure no adverse effects on the integrity of interest features of the Wye Valley and Forest of Dean Bat Sites SAC will arise from allocating Land at Tudor Road, Wyesham.

4. Poultry Units, Rockfield Road, Monmouth

Site Background

The Poultry Units Site is located approximately 1.7km west of the nearest component of Wye Valley and Forest of Dean Bat Sites SAC (Newton Court Stable Block SSSI) and is proposed for allocation in the RLDP for the development of B1 business use and associated infrastructure.

The site has planning permission (DM/2018/02026) to convert the sheds for business use (B1) with associated infrastructure. The planning permission includes provision of a purpose-built, stand-alone bat house suitable for horseshoe bats. There is a current application to vary the conditions of the application, including extending the time allowed to start implementation of the permission (DM/2025/00112).

The site is currently disused.

Survey History

The most recent habitat survey of the Poultry Units Site was conducted in March 2019. This survey found that hedgerows bordered the Site to the north, east and west. The eastern hedgerow contained two mature trees, while the hedge forming the northern and western boundary was 'gappy' with a line of mature trees running adjacent to it. The other vegetation on the Site comprised ephemeral and short perennial vegetation bordering the hedgerows, a strip of semi-improved neutral grassland along the south of the Site, and some tall ruderal near the buildings and entrance to the Site.

A review of ecological records undertaken in 2019 found that the nearest recorded bat roost was a common pipistrelle roost located 460m from the Site. The nearest records of horseshoe bat roosts were 910m from the Site for greater horseshoe bats, and 590m for lesser horseshoe bats. The nearest records of commuting and foraging horseshoe bats are 1.11km from the Site for greater horseshoe bats and 600m for lesser horseshoe bats.

A survey of trees on the Site in March 2019 found four trees with features suitable to support roosting bats. Of these, two had high suitability potential roost features, one had moderate potential roost features, and one tree had low suitability. Building inspections have also been conducted. The most recent was conducted in 2017 and found evidence that the poultry units were used for day-time roosting by three bat species: soprano pipistrelle, brown long-eared bat *Plecotus auritus*, and Brandt's bat *Myotis brandtii*. Prior surveys in 2015 and 2013 found evidence of roosting by common pipistrelle and both species of horseshoe bats. A 2024 survey submitted with the most recent application did not record any horseshoe use.

The NRW radio-tracking study (2019, unpublished) indicates the Poultry Units Site does not fall in the core foraging area for these bats from Newton Court Stable Block SSSI and none of the confirmed commuting lines intersect with this Site.

Assessment

Potential Impact Pathways

Conservation objectives relevant to this proposed allocation site include:

- Sufficient foraging habitat being available

- Management of the surrounding habitats being of the appropriate type and sufficiently secure to ensure there is likely to be no reduction in population size or range, nor any decline in the extent or quality of breeding, foraging or hibernating habitat.
- No loss or decline in the quality of linear features (such as hedgerows and tree lines) which the bats use as flight lines
- No loss of foraging habitat used by the bats or decline in its quality, such as due to over-intensive woodland management

This site is located within the 3km CSZ (based on Bat Conservation Trust guidance) for the Newton Court Stable Block roost.

The site primarily comprises of ephemeral and short perennial vegetation with hardstanding, bare ground, tall ruderal and unmanaged semi-improved grassland also present. These habitats are of low suitability for foraging horseshoe bats.

The site is bordered by hedgerow to the north, east and west. These hedgerows provide linear features that are suitable for usage by commuting bats and development may lead to disruption of this via habitat loss or disturbance due to light spillage.

Description of Impacts

The Poultry Units Site covers 0.05% of the CSZ for greater horseshoe bats at Newton Court Stable Block SSSI. With regards to the radio tracking data of greater horseshoe bats, the Poultry Units Site does not fall in the core foraging area and does not intersect with confirmed commuting lines. While this Site does fall within the overall foraging area identified by this tracking, this overall foraging area covers 5,984.8ha of which the Poultry Units Site covers 1.3ha, thus comprising approximately only 0.02% of the overall foraging area.

In light of the habitat survey, it is concluded that the Poultry Units Site is of low foraging value for lesser and greater horseshoe bats. While the Site itself is of low foraging value to horseshoe bats, the hedgerows and treeline present may provide a useful route for all commuting bats.

Description of Mitigation Measures

Several policies within the RLDP provide a policy framework to mitigate the impact of any development on the interest features of Wye Valley and Forest of Dean Bat Sites SAC.

Policy NR1 requires development proposals to assess the impact on locally designated sites, including functionally linked land and make appropriate provisions. Supporting text adds that *'Any development proposal that could have a significant effect on the integrity of a SAC, SPA or Ramsar site will not be in accordance with the development plan. This also applies to Functionally Linked Land, which is defined as habitat outside the designated site boundary that is fundamental to the ability of the designations to reach their Conservation Objectives. The parameters for this being specific to each designated site'*.

Policy GI2 requires development to protect trees, woodland and hedgerows, with any required removal to be agreed upon and replaced with suitable levels of replacement planting.

Policy LC5 requires development to minimise light spillage and potential adverse effects on biodiversity for any outdoor lighting.

In light of these policies, it is considered that the conservation status of local bat populations is unlikely to be adversely affected by the development of the Poultry Units Site in line with RLDP policies. Therefore, it is considered that the RLDP provides a sufficient policy framework to ensure no adverse effects on the integrity of Habitat Sites will arise.

5. Land at Leasbrook, Monmouth

Site background

The Leasbrook Site is located approximately 1km southwest of the nearest component of Wye Valley and Forest of Dean Bat Sites SAC (Newton Court Stable Block SSSI) and is proposed for allocation in the RLDP for the development of 270 dwellings and associated infrastructure.

The site is cattle grazed pasture.

Survey History

The Leasbrook Site and wider area were subject to a habitat survey in August 2019. This survey found that habitats on the Site consisted of improved grassland, hedgerow and scattered scrub. Although some trees were present within the hedgerows, these were not deemed suitable for use by roosting bats. The hedgerows present connect to several other hedgerows in the wider study area.

A desk study undertaken in August 2021 did not find any ecological records for bats within the Site however, it did return records for greater and lesser horseshoe bats within the search area, with many of these associated with the Newton Court Stable Block SSSI located approximately 1km from site.

Due to the habitats present on Site and proximity to the Wye Valley and Forest of Dean Bat Sites SAC, bat activity surveys and the deployment of static bat detectors were undertaken throughout the 2020 active season (May to September) and in April 2021, to determine usage by foraging and commuting horseshoe bats. These surveys covered both the Site and much of the surrounding area. Results found that the static bat recorder located within the Site recorded the lowest level of lesser horseshoe bat activity and the second lowest level of greater horseshoe bat activity.

Average registrations per night of greater horseshoe bats were below one per night each month, except for July 2020 and August 2020. Analysis of these months indicated most of these registrations occurred over a short period of time, and only occurred on a small number of the days for which the detector was out. This analysis indicated that these registrations were likely caused by an individual or small group of bats foraging close to this static detector. Average registrations per night of lesser horseshoe bats were below one per night each month, except for June 2020 and October 2020. June 2020 had an average of 2.2 registrations per night, while October 2020 had an average of 1.29.

Radio tracking of 10 female greater horseshoe bats was undertaken in 2019 as part of a yet to be published study commissioned by NRW. These bats were utilising a known maternity roost at Newton Court Stable Block SSSI, the nearest component of Wye Valley and Forest of Dean Bat Sites SAC. The Leasbrook Site primarily falls outside of the core foraging area for these bats, based on that radio tracking work.

Updated nighttime bat walkover and static bat detector surveys were undertaken between April and October 2024. These surveys did not record any lesser horseshoe bat activity within the Site, although they were detected within the wider area. The majority of these detections occurred during the October survey. These surveys only recorded three cases of greater horseshoe bat activity within the Leasbrook Site. These detections were on the Site's western boundary, in proximity to the hedgerow.

The static bat detector surveys found that the detectors located within the Site recorded the lowest (or joint lowest) activity levels for both horseshoe bats. Average registrations per night of lesser horseshoe bats was at or below one per night each month, except for late September 2024 for both detectors within the Site and late May 2024 for the westernmost detector. Average registrations per night of greater horseshoe bats was at or below two per night each month, except for July 2024, for the westernmost detector and below one per night, except for August 2024, for the easternmost.

Assessment

Potential Impact Pathways

Conservation objectives relevant to this proposed allocation site include:

- Sufficient foraging habitat being available
- Management of the surrounding habitats being of the appropriate type and sufficiently secure to ensure there is likely to be no reduction in population size or range, nor any decline in the extent or quality of breeding, foraging or hibernating habitat.
- No loss or decline in the quality of linear features (such as hedgerows and tree lines) which the bats use as flight lines
- No loss of foraging habitat used by the bats or decline in its quality, such as due to over-intensive woodland management

Based on the CSZ of 3km for greater horseshoe bats given by the bat conservation trust, this site is located within the CSZ for the Newton Court Stable Block roost. The site boundary has been determined by the 1km buffer for JSZ for this SAC.

The site consists primarily of cattle grazed pasture. This habitat is suitable for foraging by both species of horseshoe bat and as such, habitat loss from this development may impact the SAC.

The site contains hedgerows and linear features which may be utilised by commuting bats and development may lead to disruption of this via habitat loss or disturbance due to light spillage

Description of Impacts

Based on the CSZ of 3km for greater horseshoe bats given by the Bat Conservation Trust, this site covers 0.39% of the CSZ. With regards to the radio tracking data of greater horseshoe bats, the Leasbrook site primarily falls outside of the core foraging area and does not intersect with confirmed commuting lines. While this Site does fall within the overall foraging area for these tracked greater horseshoe bats, this overall foraging area covers 5,984.8ha of which the Site covers 11ha, thus comprising less than 0.2% of this overall foraging area of the tracked greater horseshoe bats. While this site is located in close proximity to the 1km JSZ for greater horseshoe bats at Newton Court Stable Block SSSI, it does not fall within this area.

The habitat survey of the site covered an area of approximately 36ha in addition to the site covering land to between Newton Court Stable Block SSSI and the site, confirming that this area also comprised of cattle pasture suitable for use by horseshoe bats. It is also noted that the land to the north, east and south-east of the wider survey area boundary comprise extensive areas of woodland, pasture and treelines. As such, the land which lies both between the site and the SAC / SSSI, and the vast majority of land to the north, east and south-east of the designated habitat site itself, provide suitable foraging and commuting opportunities for Horseshoe bats. In this context, notwithstanding the fact that surveys have identified that the site is used occasionally by Horseshoe bats for foraging, it is apparent that the site itself represents a very small proportion of potential habitat in the local area of the designated site; specifically, an area of land located immediately adjacent to existing development.

In light of the results of the surveys previously conducted on the Leasbrook Site, it is concluded that the Site does not see high levels of foraging activity for lesser or greater horseshoe bats. While the Site itself has low foraging activity of horseshoe bats, the hedgerows present may provide a useful route for all commuting bats.

Description of Mitigation Measures

Several policies within the RLDP provide a policy framework to mitigate the impact of any development on the interest features of Wye Valley and Forest of Dean Bat Sites SAC.

Strategic Policy S8 includes requirements for all residential site allocations to:

- Make provision within the development for appropriate green infrastructure...

- Demonstrate a proposal that is informed by the surrounding landscape character and reflects the distinctive landscape character, qualities and sensitivities of the area.
- Take a proactive approach to deliver a net benefit for biodiversity and ecosystem resilience within the development site by maintaining, incorporating and enhancing semi-natural habitats and ecological connectivity between them.
- Ensure the protection and enhancement of biodiversity through appropriate building design, site layouts, lighting proposals that retain dark corridors, landscaping techniques and choice of plant species.
- Ensure that trees, woodland and hedgerows along site boundaries and within the site are retained and protected as far as possible with adequate space to allow access for maintenance and to maintain functional and viable wildlife corridors and green infrastructure assets.

Policy NR1 requires development proposals to assess the impact on locally designated sites, including functionally linked land and make appropriate provisions. Supporting text adds that *‘Any development proposal that could have a significant effect on the integrity of a SAC, SPA or Ramsar site will not be in accordance with the development plan. This also applies to Functionally Linked Land, which is defined as habitat outside the designated site boundary that is fundamental to the ability of the designations to reach their Conservation Objectives. The parameters for this being specific to each designated site’*.

Policy GI2 requires development to protect trees, woodland and hedgerows, with any required removal to be agreed upon and replaced with suitable levels of replacement planting.

Policy LC5 requires development to minimise light spillage and potential adverse effects on biodiversity for any outdoor lighting.

Site specific mitigation is secured via site specific requirements within Policy HA4. Of note are the requirements for additional woodland buffer planting to be provided on the eastern edge of the site (in the blue line of ownership) to protect the Greater Horseshoe Bat Juvenile Sustenance Zone and a lighting scheme to maintain dark corridors and minimise light spill, with particular reference to the JSZ.

In light of these policies, it is considered that the conservation status of local bat populations is unlikely to be adversely affected by the development of the Leasbrook Site in line with RLDP policies. Therefore, it is considered that the RLDP provides a sufficient policy framework to ensure no adverse effects on the integrity of Habitat Sites will arise.

6. Land adjacent to Piercefield Public House, St Arvans

Site Background

The St. Arvans Site is located approximately 2.7km northeast of Itton Court Stud, part of Wye Valley Lesser Horseshoe Bat Site SSSI and component roost of Wye Valley and Forest of Dean Bat Sites SAC. The site is proposed to be allocated within the RLDP Plan for the development of approximately 16 homes.

The site is currently unmanaged with scrub encroachment.

Survey History

The most recent habitat survey of the St Arvans Site was conducted in August 2021. This survey found that the Site consisted primarily of dense scrub with some tall ruderal and rough grassland areas. Lesser horseshoe bats do not typically favour dense scrub for foraging, and the Site lacks the pasture, unimproved grassland, or forest habitats more typically favoured by greater horseshoe bats.

The Site was bounded on the south and east by dense species-rich hedgerows. The hedgerow on the southern boundary likely constituted an important hedgerow. The western boundary consisted of a line of Lawson's cypress *Chamaecyparis lawsoniana* with additional scattered trees associated with the dense scrub. None of the trees in the Site were considered ancient or veteran trees and therefore, did not constitute important ecological features.

The Site also included trees assessed as having the potential to support roosting bats. These trees were deemed to have low suitability for roosting bats and the largest trees located along the southern boundary are likely to be retained by any development. With respect to a foraging/commuting bat assemblage, the native hedgerows and tree lines along the boundaries provide strong linear features for dispersal of bats between the Site and the wider landscape.

There are records of a greater horseshoe bat roost at Wyndcliffe caves, less than 1.5km from the site. The roost is recorded as a hibernaculum but greater horseshoe bats have been recorded throughout the year. This roost is not protected by the SAC. The St Arvan's Site lies substantially distant to the Newton Court Stable Block SSSI component of the SAC and outside of the overall foraging range detected by unpublished NRW radio-tracking survey.

Assessment

Potential Impact Pathways

Conservation objectives relevant to this proposed allocation site include:

- Sufficient foraging habitat being available
- Management of the surrounding habitats being of the appropriate type and sufficiently secure to ensure there is likely to be no reduction in population size or range, nor any decline in the extent or quality of breeding, foraging or hibernating habitat.
- No loss or decline in the quality of linear features (such as hedgerows and tree lines) which the bats use as flight lines
- No loss of foraging habitat used by the bats or decline in its quality, such as due to over-intensive woodland management

The site is over 2km away from Itton Court Stud and therefore outside of the CSZ for that protected site. There are greater horseshoe bat roosts within 3km which may be functionally linked to populations protected by the Wye Valley and Forest of Dean Bat Sites SAC.

The site consists primarily of dense scrub with some tall ruderal and rough grassland areas. These habitats have low suitability for foraging by either species of horseshoe bat and as such, habitat loss from this development is not likely to impact the SAC.

The site contains hedgerows and linear features which may be utilised by commuting bats and development may lead to disruption of this via habitat loss or disturbance due to light spillage.

Description of Impacts

In light of the results of the habitat survey previously conducted, it is concluded that the Site is of low foraging value for lesser and greater horseshoe bats. While the Site itself is of low foraging value to horseshoe bats, the hedgerows and treelines present may provide a useful route for all commuting bats.

Description of Mitigation Measures

Several policies within the RLDP provide a policy framework to mitigate the impact of any development on the interest features of Wye Valley and Forest of Dean Bat Sites SAC.

Strategic Policy S8 includes requirements for all residential site allocations to:

- Make provision within the development for appropriate green infrastructure...
- Demonstrate a proposal that is informed by the surrounding landscape character and reflects the distinctive landscape character, qualities and sensitivities of the area.

- Take a proactive approach to deliver a net benefit for biodiversity and ecosystem resilience within the development site by maintaining, incorporating and enhancing semi-natural habitats and ecological connectivity between them.
- Ensure the protection and enhancement of biodiversity through appropriate building design, site layouts, lighting proposals that retain dark corridors, landscaping techniques and choice of plant species.
- Ensure that trees, woodland and hedgerows along site boundaries and within the site are retained and protected as far as possible with adequate space to allow access for maintenance and to maintain functional and viable wildlife corridors and green infrastructure assets.

Policy NR1 requires development proposals to assess the impact on locally designated sites, including functionally linked land and make appropriate provisions. Supporting text adds that *‘Any development proposal that could have a significant effect on the integrity of a SAC, SPA or Ramsar site will not be in accordance with the development plan. This also applies to Functionally Linked Land, which is defined as habitat outside the designated site boundary that is fundamental to the ability of the designations to reach their Conservation Objectives. The parameters for this being specific to each designated site’.*

Policy GI2 requires development to protect trees, woodland and hedgerows, with any required removal to be agreed upon and replaced with suitable levels of replacement planting.

Policy LC5 requires development to minimise light spillage and potential adverse effects on biodiversity for any outdoor lighting.

Site specific mitigation is secured via site specific requirements within Policy HA13. Of note are the requirements for existing boundary features to be enhanced with additional hedgerow and tree planting to boundaries, and the requirement for a lighting strategy that minimises light spillage on to wildlife corridors and habitats.

In light of these policies, it is considered that the conservation status of local bat populations is unlikely to be adversely affected by the development of the St Arvan’s Site in line with RLDP policies. Therefore, it is considered that the RLDP provides a sufficient policy framework to ensure no adverse effects on the integrity of Habitat Sites will arise.

7. Land west of Redd Landes, Shirenewton

Site Background

The Land west of Redd Landes Site is located approximately 640m southwest of the nearest component of Wye Valley and Forest of Dean Bat Sites SAC (Mwyngloddfa Mynydd-Bach SSSI) and is proposed to be allocated in the Deposit Plan for the development of 26 dwellings and associated infrastructure.

The site is currently arable farmland.

Habitat Surveys

The Land West of Redd Landes Site and wider area were subject to habitat surveys in August 2019. The Site was dominated by arable land, which is sub-optimal foraging habitat for lesser horseshoe bats. A small stream was located along the southern edge of the eastern field and was bordered by a small area of poor semi-improved grassland and a small area of dense continuous scrub. Small areas of dense scrub, semi-improved grassland and tall ruderal were located in the eastern corner of the western field.

Native species-rich hedgerows formed the eastern and western boundaries of the eastern field. These hedgerows had direct connectivity to a patch of woodland to the north. One of these hedgerows also formed part of the eastern boundary of the western field. The western field was also bounded by three species-poor hedgerows along the eastern, southern and western boundaries. Most of the hedges were cut to approximately 1m in height. This made them less suitable for use by foraging lesser horseshoe bats. As well as foraging habitat, linear features are important for connecting habitats, although the Site did not appear to be situated at a key location in-between patches of good quality habitat. The Site was not considered to support highly suitable habitat for lesser horseshoe bats, however, the use of this Site by this species cannot be ruled out.

Assessment

Potential Impact Pathways

Conservation objectives relevant to this proposed allocation site include:

- Sufficient foraging habitat being available
- Management of the surrounding habitats being of the appropriate type and sufficiently secure to ensure there is likely to be no reduction in population size or range, nor any decline in the extent or quality of breeding, foraging or hibernating habitat.
- No loss or decline in the quality of linear features (such as hedgerows and tree lines) which the bats use as flight lines
- No loss of foraging habitat used by the bats or decline in its quality, such as due to over-intensive woodland management

This site is located within the CSZ for the Mwyngloddfa Mynydd-Bach SSSI, based on the 2km CSZ for lesser horseshoe bats.

In light of the habitat surveys it is concluded that the Land West of Redd Landes Site is of low foraging value for lesser horseshoe bats as it comprises primarily arable land which is of known low foraging value for that species.

The hedgerows present may provide a useful route for all commuting bats. However, after an initial review, the hedgerows do not appear to provide a key connection between areas of good habitat and as such are likely of low value for commuting bats.

Description of Impacts

Based on the CSZ of 2km for lesser horseshoe bats given by the bat conservation trust, this site covers 0.095% of this CSZ. The only component SSSIs within 3km of this Site are not designated for greater horseshoe bats and, therefore, the Land West of Redd Landes Site does not fall within the 3km CSZ for greater horseshoe bats.

While the Site is located within the foraging range of lesser horseshoe bats from a key hibernation site, winter foraging generally occurs in damp woodlands with decaying wood and grazed pasture with lots of dung, so any use of the Land West of Redd Landes Site for foraging is unlikely to be significant. Additionally, whilst the stream on Site could be used by bats as a water source, other water sources are present nearer to the hibernation roost.

Description of Mitigation Measures

Several policies within the RLDP provide a policy framework to mitigate the impact of any development on the interest features of Wye Valley and Forest of Dean Bat Sites SAC.

Strategic Policy S8 includes requirements for all residential site allocations to:

- Make provision within the development for appropriate green infrastructure...
- Demonstrate a proposal that is informed by the surrounding landscape character and reflects the distinctive landscape character, qualities and sensitivities of the area.

- Take a proactive approach to deliver a net benefit for biodiversity and ecosystem resilience within the development site by maintaining, incorporating and enhancing semi-natural habitats and ecological connectivity between them.
- Ensure the protection and enhancement of biodiversity through appropriate building design, site layouts, lighting proposals that retain dark corridors, landscaping techniques and choice of plant species.
- Ensure that trees, woodland and hedgerows along site boundaries and within the site are retained and protected as far as possible with adequate space to allow access for maintenance and to maintain functional and viable wildlife corridors and green infrastructure assets.

Policy NR1 requires development proposals to assess the impact on locally designated sites, including functionally linked land and make appropriate provisions. Supporting text adds that *‘Any development proposal that could have a significant effect on the integrity of a SAC, SPA or Ramsar site will not be in accordance with the development plan. This also applies to Functionally Linked Land, which is defined as habitat outside the designated site boundary that is fundamental to the ability of the designations to reach their Conservation Objectives. The parameters for this being specific to each designated site’.*

Policy GI2 requires development to protect trees, woodland and hedgerows, with any required removal to be agreed upon and replaced with suitable levels of replacement planting.

Policy LC5 requires development to minimise light spillage and potential adverse effects on biodiversity for any outdoor lighting.

Site specific mitigation is secured via site specific requirements within Policy HA18. Of note are the requirements for existing boundary features to be enhanced with additional hedgerow and tree planting to boundaries, and the requirement for a lighting strategy that minimises light spillage on to wildlife corridors and habitats.

In light of these policies, it is considered that the conservation status of local bat populations is unlikely to be adversely affected by the development of Land West of Redd Landes Site in line with RLDP policies. Therefore, it is considered that the RLDP provides a sufficient policy framework to ensure no adverse effects on the integrity of Habitat Sites will arise.

8. Land at Rockfield Road, Monmouth

Site Background

The Rockfield Road Site is located approximately 2.9km southwest of Newton Court Stable SSSI. The site is 1.5 ha and is proposed to be allocated within the RLDP Plan for the development of approximately 60 homes.

The Rockfield Road Site comprises part of the area covered by a planning application currently under consideration. The proposed development comprises dwellings, open space, play space, landscaping, and associated infrastructure.

Survey History

The most recent habitat survey of the Rockfield Road Site was conducted in 2019. This survey found that the Site consisted primarily of improved grassland.

The southwestern boundary of the site comprised a dry ditch associated with a hedgerow. The northwestern boundary of the site comprised a fence line and an associated hedgerow with trees. The northeastern boundary consisted of a fence line separating the field from a public footpath. The southeastern boundary of the site comprised of fencing and a hedgerow. This hedgerow forms the curtilage of existing dwellings located south of the site.

During the 2019 habitat survey, a ground level tree inspection of all trees within and adjacent to the site was undertaken and two trees were identified with a low potential to support roosting bats. Both of these trees were ash trees located along the northwestern boundary of the site.

Assessment

Potential Impact Pathways

Conservation objectives relevant to this proposed allocation site include:

- Sufficient foraging habitat being available
- Management of the surrounding habitats being of the appropriate type and sufficiently secure to ensure there is likely to be no reduction in population size or range, nor any decline in the extent or quality of breeding, foraging or hibernating habitat.
- No loss or decline in the quality of linear features (such as hedgerows and tree lines) which the bats use as flight lines
- No loss of foraging habitat used by the bats or decline in its quality, such as due to over-intensive woodland management

Newton Court Stable Block SSSI is located within 3km of the Rockfield Road Site and therefore this site falls within the 3km CSZ for greater horseshoe bats.

The site consists primarily of improved grassland. This habitat has low suitability for foraging by either species of horseshoe bat and, as such, habitat loss due to this development is not likely to impact the SAC.

The site contains hedgerows and linear features which may be utilised by commuting bats and development may lead to disruption of this via habitat loss or disturbance due to light spillage.

Description of Impacts

Based on the CSZ of 3km for greater horseshoe bats given by the bat conservation trust, this site covers 0.095% of this CSZ. With regards to the radio tracking data of greater horseshoe bats, the Rockfield Road site does not intersect with confirmed commuting lines. While this Site does fall within the core and overall foraging areas for these tracked greater horseshoe bats, the overall foraging area covers 5,984.8ha of which the Site covers 1.5ha, thus comprising less than 0.03% of this overall foraging area of the tracked greater horseshoe bats. The core foraging area covers an area of 2799.5ha meaning that the site only covers 0.054% of this area. This site does not fall within the 1km JSZ for greater horseshoe bats at Newton Court Stable Block SSSI.

In light of the results of the habitat survey previously conducted, it is concluded that the Site is of low foraging value for lesser and greater horseshoe bats. While the Site itself is of low foraging value to horseshoe bats, the hedgerows and treelines present may provide a useful route for all commuting bats.

Description of Mitigation Measures

Strategic Policy S8 includes requirements for all residential site allocations to:

- Make provision within the development for appropriate green infrastructure...
- Demonstrate a proposal that is informed by the surrounding landscape character and reflects the distinctive landscape character, qualities and sensitivities of the area.
- Take a proactive approach to deliver a net benefit for biodiversity and ecosystem resilience within the development site by maintaining, incorporating and enhancing semi-natural habitats and ecological connectivity between them.
- Ensure the protection and enhancement of biodiversity through appropriate building design, site layouts, lighting proposals that retain dark corridors, landscaping techniques and choice of plant species.
- Ensure that trees, woodland and hedgerows along site boundaries and within the site are retained and protected as far as possible with adequate space to allow access for

maintenance and to maintain functional and viable wildlife corridors and green infrastructure assets.

Policy NR1 requires development proposals to assess the impact on locally designated sites, including functionally linked land and make appropriate provisions. Supporting text adds that *‘Any development proposal that could have a significant effect on the integrity of a SAC, SPA or Ramsar site will not be in accordance with the development plan. This also applies to Functionally Linked Land, which is defined as habitat outside the designated site boundary that is fundamental to the ability of the designations to reach their Conservation Objectives. The parameters for this being specific to each designated site’.*

Policy GI2 requires development to protect trees, woodland and hedgerows, with any required removal to be agreed upon and replaced with suitable levels of replacement planting.

Policy LC5 requires development to minimise light spillage and potential adverse effects on biodiversity for any outdoor lighting.

Policy HA6 makes site specific requirements for this allocation. Of note are the requirement for development on the site to include opportunities for grassland and hedgerow restoration with appropriate buffers and the requirement for a lighting strategy that minimises light spillage on to wildlife corridors and habitats, with particular reference to corridors used by horseshoe bats.

In light of these policies, it is considered that the conservation status of local bat populations is unlikely to be adversely affected by the development of the Rockfield Road Site. Therefore, it is considered that the RLDP provides a sufficient policy framework to ensure no adverse effects on the integrity of Habitat Sites will arise.

9. Conclusions

Assessing the six proposed sites for allocation located within 3km of Wye Valley and Forest of Dean Bat Sites SAC, four are located within the 3km CSZ for greater horseshoe bats at Newton Court Stable Block SSSI (the Tudor Road site, the Poultry Units site, the Leasbrook site and the Rockfield Road site). Tudor Road is also located within the 2km CSZ for lesser horseshoe bats at Penallt Old Church SSSI. The Land West of Redd Landes Site is located within the 2km CSZ for lesser horseshoe bats at Mwyngloddfa Mynydd-Bach SSSI. The Land adjacent to Piercefield Public House site is located over 2km from the nearest protected roost (Itton Court Stud, part of Wye Valley Lesser Horseshoe Bat Sites SSSI) so it not within a CSZ of a protected site.

No proposed development site covers more than 1% of the CSZ for any constituent SSSI. The component SSSI in proximity to most Sites was Newton Court SSSI. The development Sites collectively amount to 0.57% of the total area of the CSZ of greater horseshoe bats for this SSSI and, therefore, won't impede the conservation objective of maintaining sufficient foraging habitat given that over 99% of the habitat within the CSZ will be unaffected.

Two of the proposed allocation sites fell within the core foraging area for bats identified by the NRW radio tracking study. The whole of the Rockfield Road site (4.3ha) and the northern part of the Leasbrook site (1.8 of 11.1 hectares) falls within the core foraging area.

Only the Leasbrook Site is located on cattle grazed land. This site comprises 11ha. Ecological surveys for this site confirm that the wider survey area, totalling 47ha comprised cattle grazed pasture. Additionally it noted that located to the north, east and southeast of the wider survey area was additional habitat suitable for foraging horseshoe bats including broadleaved woodland and cattle grazed pasture. In this context it is apparent that the site itself represents a very small proportion of potential habitat in the local area of the designated site; specifically, an area of land located immediately adjacent to existing development.

Four of the proposed sites for allocation (the Poultry Units site, Land Adjacent to Piercefield Public House, Land west of Redd Landes, and the Rockfield Road site) have low suitability for foraging, with bat surveys undertaken at the other two sites (the Tudor Road site and the Leasbrook Site) indicating low levels of foraging and commuting activity when compared with the surrounding area.

Regarding the conservation objectives specific to Wye Valley and Forest of Dean Bat Sites SAC, sufficient foraging habitat is maintained with minimal loss in suitable foraging habitat within the CSZ of designated roosts within the SAC. Policies to control the impact on habitats bordering the proposed sites are implemented in the RLDP including policy requirements to minimise the impacts of light spill and linear features that could serve as bat flight lines are protected both broadly within the RLDP and via site specific measures implemented in all of the proposed residential allocation policies.

