



# EAST PARK ENERGY

**East Park Energy**

EN010141

## **Information to Inform a Habitats Regulations Assessment**

**Document Reference: EN010141/DR/5.7**

Infrastructure Planning (Applications: Prescribed Forms and  
Procedure) Regulations 2009: Regulation 5(2)(g)

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# EAST PARK ENERGY

Planning Act 2008

Infrastructure Planning (Applications: Prescribed  
Forms and Procedure) Regulations 2009

## Information to Inform a Habitats Regulations Assessment

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## **1.0 INTRODUCTION**

### **1.1 Purpose of this Document**

- 1.1.1 This report has been produced to assist in the undertaking of a Habitats Regulations Assessment (HRA) by the relevant Competent Authority for the East Park Energy project (the ‘Scheme’).
- 1.1.2 The purpose of the report is to provide evidence to determine the potential for the Scheme to impact on European sites. This will enable the Competent Authority to decide whether Appropriate Assessment is required. It provides the Competent Authority with the necessary ecological information regarding the Scheme with respect to its potential for Likely Significant Effects (LSEs) upon the qualifying features of European sites in the UK (i.e. those which form part of the National Site Network).

### **1.2 Legislative and Policy Background**

#### **Legislation**

- 1.2.1 Council Directives 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora (“the Habitats Directive”) and 2009/147/EC on the conservation of wild birds (“the Birds Directive”) provide for the designation of sites for the protection of certain species and habitats. The sites designated under these Directives are collectively termed European sites and form part of a network of protected sites across Europe, known as the Natura 2000 network. In the UK the Conservation of Habitats and Species Regulations 2017 (‘the Habitats Regulations’) transpose these Directives into national law.
- 1.2.2 The Habitats Regulations is one of the pieces of domestic law that transposed the land and marine aspects of the Habitats Directive and certain elements of the Wild Birds Directive. Following the changes made by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (‘the 2019 Regulations’), Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) in the U.K. no longer form part of the EU’s Natura 2000

ecological network. The 2019 Regulations have created a national site network on land and at sea, including both the inshore and offshore marine areas in the UK. The national site network includes existing SACs and SPAs, new SACs and SPAs designated under these Regulations.

- 1.2.3 Any references to Natura 2000 in the Habitats Regulations and in guidance now refer to the new national site network.
- 1.2.4 The U.K. Government is also a signatory to The Convention on Wetlands of International Importance Especially as Waterfowl Habitat 1971 (“the Ramsar Convention”). The Ramsar Convention provides for the listing of wetlands of international importance.

## Policy

- 1.2.5 The Overarching National Policy Statement (NPS) for Energy (EN-1) states at paragraph 5.4.5 that:

*‘As a matter of policy, the following should be given the same protection as sites covered by the Habitats Regulations and an HRA will also be required:*

*(a) potential Special Protection Areas and possible Special Areas of Conservation;*

*(b) listed or proposed Ramsar sites; and*

*(c) sites identified, or required, as compensatory measures for adverse effects on any of the other sites covered by this paragraph.’*

- 1.2.6 For the purposes of this report, in line with the Habitats Regulations and relevant Government policy, the term “European sites” and new national site network includes Special Areas of Conservation (SAC), candidate SACs (cSAC), possible SACs (pSAC), Special Protection Areas (SPA), potential SPAs (pSPA), Sites of Community Importance (SCI), listed and proposed

Ramsar Sites and sites identified or required as compensatory measures for adverse effects on any of these sites.

- 1.2.7 Amongst other things, the Habitats Regulations define the process for the assessment of the implications of plans or projects on European sites. This process is termed HRA.
- 1.2.8 This HRA process can involve up to four stages, as summarised in Box 1.

**Box 1 Stages of Habitats Regulations Assessment**

**Stage 1 – Screening:**

This stage identifies the likely impacts upon a European Site of a project or Plan, either alone or 'in combination' with other projects or plans, and considers whether these impacts are likely to be significant.

**Stage 2 – Appropriate Assessment:**

Where there are likely significant impacts, this stage considers the impacts of the Plan or project on the integrity of the relevant European Sites, either alone or 'in combination' with other projects or plans, with respect to the sites' structure and function and their conservation objectives. Where there are adverse impacts, it also includes an assessment of the potential mitigation for those impacts.

**Stage 3 – Assessment of Alternative Solutions:**

Where adverse impacts [on the integrity of the site] are predicted, this stage examines [whether or not there are] alternative ways of achieving the objectives of the project or Plan that avoid adverse impacts on the integrity of European Sites.

**Stage 4 – Assessment Where No Alternative Solutions Exist and Where Adverse Impacts Remain:**

This stage assesses compensatory measures where it is deemed that the project or Plan should proceed for imperative reasons of overriding public interest (IROPI).

- 1.2.9 Stages 1 and 2 are covered by Regulation 63 of the Habitat Regulations, and Stages 3 and 4 are covered by Regulations 64, 68 and 84 of the Habitat Regulations.
- 1.2.10 Screening can be used to screen-out European sites and elements of works from further assessment, if it is possible to determine that significant effects are unlikely (e.g., if sites or interest features are clearly not vulnerable (exposed and / or sensitive) to the outcomes of the proposal due to the absence of any reasonable impact pathways).
- 1.2.11 The screening process has two potential conclusions, namely that the Scheme, alone or in combination with other developments, could result in:

- No LSE on any of the qualifying features of the site; or
- LSE identified, or cannot be ruled out, on one or more of the qualifying features of the site.

1.2.12 Only the second of these outcomes will trigger an Appropriate Assessment (AA). If one or more LSE are identified, or cannot be ruled out, it is then necessary to proceed to Stage 2 and produce an AA.

1.2.13 With respect to Stage 2, the integrity of a European Site relates to the site's conservation objectives and has been defined in guidance<sup>1</sup> as "*coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was designated*". An adverse effect on integrity, therefore, is likely to be one which prevents the site from making the same contribution to favourable conservation status for the relevant feature as it did at the time of designation. The HRA screening process uses the threshold of LSE to determine whether effects on European sites should be the subject of further assessment. The Habitats Regulations do not define the term LSE. However, in the Waddenzee case (Case C127/02), the European Court of Justice found that an LSE should be presumed, and an AA carried out if it cannot be excluded on the basis of objective information that the plan or project will not have significant effects on the conservation objectives of the site concerned, whether alone or in combination with any other project. The Advocate General's opinion of the Sweetman case (Case C-258/11) further clarifies the position by noting that for a conclusion of an LSE to be made "*there is no need to **establish** such an effect...it is merely necessary to determine that there **may** be such an effect*" (original emphasis).

1.2.14 For the reasons highlighted above the assessment process follows the precautionary principle throughout and the word 'likely' is regarded as a

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<sup>1</sup> <https://www.gov.uk/guidance/appropriate-assessment>

description of a risk (or possibility) rather than in a legal sense an expression of probability.

- 1.2.15 On 12 April 2018, the Court of Justice of the European Union (CJEU) issued a judgment on Case C323/17 (People over Wind, Peter Sweetman v Coillte Teoranta) which stated (at paragraph 41):

*“Article 6(3) of Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora must be interpreted as meaning that, in order to determine whether it is necessary to carry out, subsequently, an appropriate assessment of the implications, for a site concerned, of a plan or project, it is not appropriate, at the screening stage, to take account of the measures intended to avoid or reduce the harmful effects [mitigation] of the plan or project on that site.”*

- 1.2.16 This means that any mitigation relating to protected sites will not be considered at the screening stage but taken forward and considered at the AA stage under the Regulation 63(1) of the Habitat Regulations to inform a decision on whether no adverse effects on site integrity can be demonstrated.
- 1.2.17 The assessment provided within this Information to Inform a Habitats Regulations Assessment report takes into account the CJEU ruling on ‘People over Wind’ and the precautionary principle has been applied as per the Waddenzee case.
- 1.2.18 Additionally, this assessment has considered Defra<sup>2</sup> and Planning Inspectorate guidance<sup>3</sup>.

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<sup>2</sup> <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-habitats-regulations-assessments> [Accessed 22/09/2025]

<sup>3</sup> <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site> [Accessed 22/09/2025]



## 2.0 INFORMATION TO INFORM THE ASSESSMENT

### 2.1 Site Description

- 2.1.1 The ecological baseline of the Site is described fully in **ES Vol 1 Chapter 7: Ecology and Nature Conservation [EN010141/DR/6.1]** and **ES Vol 2 Appendices 7-1 to 7-7 [EN010141/DR/6.2]**.
- 2.1.2 The area of land required for the construction, operation and maintenance of the Scheme, which includes land required for permanent and temporary purposes, is shown on **ES Vol 3 Figure 1-1: Site Location [EN010141/DR/6.3]**. This is referred to as the 'Order Limits' or the 'Site'.
- 2.1.3 The 'Site' is located to the north-west of the town of St Neots, and is across two administrative areas; Bedford Borough Council (BBC) (a unitary authority) and Huntingdonshire District Council (HDC) (a two-tier authority with Cambridgeshire County Council). The Site location is shown on **ES Vol 3 Figure 1-1: Site Location [EN010141/DR/6.3]**. The Site area extends to approximately 773 hectares (ha).

### 2.2 Project Description

- 2.2.1 The Scheme is described fully in **ES Vol 1 Chapter 2: The Scheme [EN010141/DR/6.1]**.
- 2.2.2 The Scheme comprises a new ground-mounted solar photovoltaic energy generating station and an associated on-site battery energy storage system (BESS) on land to the north-west of St Neots. The Scheme also includes the associated infrastructure for connection to the national grid at the Eaton Socon National Grid Substation.
- 2.2.3 The Scheme would allow for the generation and export of 400 megawatts (MW) of renewable electricity, as well as the storage of 100 MW of electricity in the BESS. The precise generating capacity and storage capacity will be subject to detailed design, but it should be noted that the Applicant presently

has a grid connection agreement with National Grid for 400 MW export and 100 MW import.

- 2.2.4 Subject to the Scheme securing Development Consent in Winter 2026/27 it is anticipated that works would start on site in early 2028 and be completed by mid-to late 2030 (although initial energisation of the Scheme is likely to commence prior to 2030). The Scheme comprises a temporary development with an operational phase of 40 years; decommissioning activities would therefore likely commence in 2070, 40 years after commissioning.
- 2.2.5 For the purposes of this report, mitigation which is embedded into the design of the scheme, required by other legislative requirement and/ or considered best practice will be considered at screening stage. Only mitigation that is specifically required to address impacts on the European Site would be considered at the Appropriate Assessment Stage. .

## 2.3 European Sites

- 2.3.1 A plan showing statutory designated sites for nature conservation is provided as **ES Vol 3 Figure 7-1 [EN010141/DR/6.3]**.
- 2.3.2 One designated European Site has been identified for screening based on its proximity to the Site (taken as being within a search area of 10km, extended to 30km for bats) and/or their connectivity to it (e.g. ecological or hydrological connectivity).
- 2.3.3 Table 1 below details the European Site identified for screening and outlines their qualifying features, as described within the corresponding European Site Conservation Objectives document, presented in Appendix A.

**Table 1: Statutory Designated Sites Identified for HRA Screening**

Site Name	Approximate Distance and Direction from Site	Description of Qualifying Features
Eversen and Wimpole Woods SAC	17.4km south-east	<p>Annex II species that are a primary reason for selection of this site:</p> <p>1308 Barbastelle <i>Barbastella barbastellus</i></p> <p>The site comprises a mixture of ancient coppice woodland (Eversden Wood) and high forest woods likely to be of more recent origin (Wimpole Woods). A colony of barbastelle <i>Barbastella barbastellus</i> is associated with the trees in Wimpole Woods. These trees are used as a summer maternity roost where the female bats gather to give birth and rear their young. Most of the roost sites are within tree crevices. The bats also use the site as a foraging area. Some of the woodland is also used as a flight path when bats forage outside the site.</p>

## 2.4 Conservation Objectives

- 2.4.1 A HRA is required to assess if a project (or plan) is likely to have a significant adverse effect on the conservation objectives of a European site.
- 2.4.2 The conservation objectives of a European site are a statement of standards and integrity of the site which must be met to maintain (or restore) the qualifying features of the European Site at (or to) “favourable conservation status” (FCS).
- 2.4.3 As defined the Articles 1(e) and 1(i) of the Habitats Directive, the conservation status will be taken as “favourable” according to the following definitions.

*The conservation status of a natural habitat will be taken as favourable when:*

- *Its natural range and areas it covers within that range are stable or increasing;*
- *The specific structure and functions which are necessary for its long-term maintenance exist and are likely to continue to exist for the foreseeable future; and,*
- *The conservation status of its typical species is favourable.*

*The conservation status of a species will be taken as 'favourable' when:*

- *population dynamics data on the species indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats;*
- *the natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future; and,*
- *There is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.*

2.4.4 The Conservation Objectives for Eversden and Wimpole Woods SAC are:

*To ensure that, subject to natural change, the integrity of the site is maintained or restored as appropriate, and that the site contributes to achieving the Favourable Conservation Status of its qualifying features, by maintaining or restoring:*

- *the extent and distribution of qualifying natural habitats and habitats of the qualifying species*
- *the structure and function (including typical species) of qualifying natural habitats*
- *the structure and function of the habitats of the qualifying species*
- *the supporting processes on which qualifying natural habitats and the habitats of qualifying species rely*
- *the populations of each of the qualifying species*
- *the distribution of qualifying species within the site*

2.4.5 Further information can be found within the Supplementary Advice on Conservation Objectives<sup>4</sup>.

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<sup>4</sup> Natural England (2018) *European Site Conservation Objectives: Supplementary advice on conserving and restoring site features Eversden and Wimpole Woods SAC*. Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0030331.pdf> [accessed 29/07/2025]

## **3.0 POTENTIAL FOR LIKELY SIGNIFICANT EFFECTS (SCREENING)**

### **3.1 Overview**

- 3.1.1 The Scheme is not directly connected to, or necessary for the conservation management of a European Site and is therefore a Project and requires consideration through the HRA process.
- 3.1.2 Likely Significant Effect or LSE , in this context, means a risk or possibility that the project may have an effect on a European Site that may affect the conservation objectives of the features for which the site was designated, but excluding trivial or inconsequential effects
- 3.1.3 Where a LSE is identified, an AA must be undertaken to consider the potential for significant adverse effects on the integrity of the European site or its qualifying interest species.
- 3.1.4 Potential effects to Eversden and Wimpole Woods SAC are considered during the construction, operation and decommission phases of the Scheme. Construction of the Scheme will broadly involve the installation of solar PV arrays on metal frames with associated infrastructure including substation, BESS, cabling, access and landscaping. Operational activities will be restricted to occasional maintenance which will not generate significant levels of noise, vibration or lighting. During the decommissioning phase increased noise and vibration levels are likely to occur during the dismantling of the solar panels and removal of equipment from the Site and are considered to be comparable or lesser to those experienced during construction.

### **3.2 Potential Effects upon Qualifying Habitat Features of European Sites**

- 3.2.1 Eversden and Wimpole Woods SAC is not designated for Qualifying Habitat features. Where relevant, the potential for impacts to supporting habitats of qualifying species are discussed separately below.

### 3.3 Potential Effects upon Qualifying Species Features of European Sites

#### Background

- 3.3.1 The sole qualifying designated features of Eversden and Wimpole Woods SAC is barbastelle bat. The woods are used as a roost site, principally as a summer maternity roost, as a foraging area, and also a flight path when foraging beyond the boundaries of the SAC.
- 3.3.2 Records of protected and notable species within the Order Limits and a 2km buffer, including barbastelle, were requested from Bedfordshire and Luton Biodiversity Recording and Monitoring Centre (BLBRMC) and also from Cambridgeshire and Peterborough Environmental Records Centre (CPERC). Two records of barbastelle were returned by Cambridgeshire and Peterborough Environmental Records Centre within the 2km desk study search area, one from Little Paxton Woods in 2012 and the other from the River Great Ouse Corridor at St Neots in 2019. Neither record was located within the Site. No records of barbastelle were returned by BLBRMC
- 3.3.3 Detailed methodologies and results of bat activity surveys undertaken in support of the Scheme are presented in **ES Vol 2 Appendix 7-7: Bat Activity Survey Report [EN010141/DR/6.2]** with methodologies and relevant results summarised below.

#### Survey Methodology

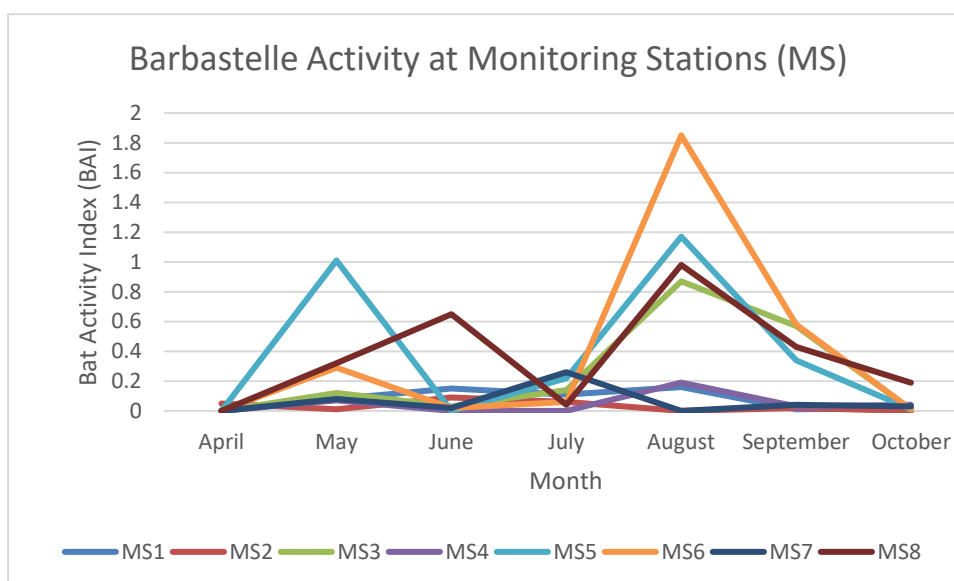
- 3.3.4 The following assessments and/or baseline surveys have been undertaken:
- Habitat Suitability Assessment (HSA);
  - Manual Bat Activity Surveys (i.e., Night-time Bat Walkovers); and,
  - Automated Bat Activity Surveys (i.e., static detector surveys).

- 3.3.5 Bat activity survey effort was determined in reference to BCT guidance (Collins, 2023) following an assessment of **Moderate** habitat suitability for the overall Site (Results: Habitat Suitability Assessment).
- 3.3.6 As such, night-time bat walkovers (NBW) (i.e., manual bat activity surveys) were undertaken on a seasonal basis (i.e. spring, summer and autumn).
- 3.3.7 Static detector (Monitoring Station (MS)) surveys (i.e. automated bat activity surveys) were undertaken monthly throughout the prescribed bat activity period (i.e. April to October). Eight MS (MS1-8) were deployed within representative habitats across the Order Limits as shown on **ES Vol 3: Figure 7-6 [EN010141/DR/6.3]**.

### **Results**

- 3.3.8 Barbastelle were recorded within the Site across all survey areas. Activity was relatively lower at MS1 and MS2, MS4 and MS7. At the remaining locations (MS3, MS5, MS6 and MS8) activity levels were broadly typical during October 2023 to July 2024, with a marked peak in activity during August 2024 which then decreased in September 2024. Lower peaks in activity were observed during May and June 2024 for MS5 and MS8, respectively.
- 3.3.9 This would broadly coincide with a peak in activity as individuals disperse away from maternity colonies in late summer and early Autumn, with a lower spring peak during the spring transitional period. Results are presented graphically below in Chart 1:

**Chart 1: Observed Bat Activity Index**



## Ecology of Barbastelle

3.3.10 The below presents a brief description of the ecological preferences of barbastelle using information gathered from the JNCC<sup>5</sup>, Bat Conservation Trust<sup>6</sup>, Collins (2023)<sup>7</sup> and Natural England and Zeale (2024)<sup>8</sup>.

### Roosting and mating

3.3.11 Barbastelle maternity roosts are principally located within trees, often in cracks and crevices of dead trees, although the species will also use bat boxes and buildings. During summer, the species displays frequent roost-switching behaviours and as such, the species is associated with broadleaved and ancient woodlands where large numbers of mature and decaying trees are present.

3.3.12 Transitional spring and autumn roosts appear to be similarly located within dead trees. Hibernation roosts include both trees and also buildings and underground sites.

<sup>5</sup> <https://sac.jncc.gov.uk/species/S1308/>

<sup>6</sup> <https://www.bats.org.uk/about-bats/what-are-bats/uk-bats/barbastelle>

<sup>7</sup> Collins, J. (ed.) (2023) *Bat Surveys for Professional Ecologists: Good Practice Guidelines* (4th edition). The Bat Conservation Trust, London. ISBN-978-1-7395126-0-6

<sup>8</sup> Zeale, M. and Natural England (2024) *Definition of Favourable Conservation Status for barbastelle bat RP2974*



3.3.13 The species disperses from maternity areas to mating and hibernation sites that can be many kilometres from maternity roosting sites. While limited UK specific literature is available to determine distances, Eurobats<sup>9</sup> describe the species as ‘largely sedentary’ and with the distance between summer and winter roosts as usually being under 40km.

3.3.14 Little is known about the mating behaviour of barbastelle, but it is known to occur during autumn prior to hibernation, as well as within hibernation roosts.

### **Foraging and commuting**

3.3.15 Barbastelle forage over riparian corridors, broadleaved woodland, unimproved grassland and along field margins. Within agricultural landscapes, hedgerows are likely to be important foraging and commuting habitats. The principal food source for barbastelle is moths.

3.3.16 The Bat Conservation Trust has identified Core Sustenance Zones (CSZ) for all species of bat present in Britain. The CSZ is defined as:

*The area surrounding a communal bat roost within which habitat availability and quality will have a significant influence on the resilience and conservation status of the colony using the roost.*

3.3.17 The Bat Conservation Trust define the CSZ of barbastelle as being 6km, with moderate confidence, although larger foraging distances of up to 20km have been recorded.

3.3.18 Barbastelle appear to be relatively intolerant of light pollution, and will restrict foraging to within woodland only crossing open areas after dark.

### **Assessment of LSE**

3.3.19 The Scheme is physically separated from Eversden and Wimpole Woods SAC by a distance of over 17km and as such no direct impacts to barbastelle

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<sup>9</sup> UNEP/EUROBATS Secretariat (Undated). *Barbastella barbastellus*. Available at: [https://www.eurobats.org/about\\_eurobats/protected\\_bat\\_species/barbastella\\_barbastellus](https://www.eurobats.org/about_eurobats/protected_bat_species/barbastella_barbastellus)

or their roosting, foraging or commuting habitats within the SAC boundaries are anticipated. Similarly, by virtue of this separation distance no indirect impacts to supporting habitats within the SAC boundaries, such as through noise or lighting disturbance, air quality or hydrological impacts, are anticipated.

- 3.3.20 Barbastelle bat are however a mobile species and are likely to rely on habitats outside of the SAC boundaries for foraging, commuting and at other stages in their lifecycle, such as for hibernation, mating or when moving between roosts. Any modification on such supporting habitats could conceivably affect the favourable conservation status of bats associated with the SAC.
- 3.3.21 Barbastelle have a CSZ of 6km, although may travel further. The Natural England Supplementary Advice on Conservation Objectives states that radio-tracking studies conducted at Eversden and Wimpole Woods have shown bats traveling up to 11km a night to forage. As such, given the site is located beyond 17km away no impacts are located within this CSZ or known foraging range and as such no impacts to barbastelle foraging beyond the boundary of Eversden and Wimpole Woods are anticipated.
- 3.3.22 The species may however range further outside of the maternity period, particularly when dispersing to mating or hibernation sites, although UK specific literature is lacking on distances. Following European literature, it is assumed that the species typically ranges up to 40km, and as such the Site may lie within this dispersal range.
- 3.3.23 The embedded outline **Construction Environmental Management Plan (oCEMP) [EN010141/DR/7.3]** that forms part of the Scheme sets out the environmental controls and best practice measures to minimise any adverse effects from construction. The oCEMP includes measures to protect field boundary habitats, including hedgerows and watercourses. Hedgerow habitats will be almost entirely retained and protected with buffer zones of at least 6m, with the exception of small-scale removal/ widening required to permit Site access at ten locations and totalling 84m with no individual length

of removal greater than 6m. Post-construction seven crossing points, totalling 42m, will be reinstated. This limited hedgerow removal is considered inconsequential to barbastelle, and unlikely to disrupt any flight paths.

- 3.3.24 The embedded **oCEMP [EN010141/DR/7.3]** includes general best practice measures to minimise light spill. Temporary mobile lighting towers may be required at construction compounds during the winter months to comply with health and safety requirements. Construction operations would be limited to 08.00 to 18.00hrs Monday to Friday and 08:00 to 13:00hrs Saturday; darkness would not occur during working hours other than during the period between approximately mid-October and mid-March. As such, the period in which this lighting may be required would broadly coincide with the period in which barbastelle would be hibernating and so is unlikely to disrupt foraging or commuting routes. In line with standard best practice, lighting would be directed away from boundary features and fitted with directional fitting such as cowls and hoods to minimise light spill to boundary features. Construction lighting is considered unlikely to affect barbastelle
- 3.3.25 During operation the Scheme would not be routinely lit, with emergency lighting only located at areas such as the East Park substation and BESS compound. Emergency lighting would be operated either by infrared motion detector or manually operated and used only rarely in the event out-of-hours maintenance is required. Similarly to construction lighting, lighting would be directed away from boundary features and fitted with directional fitting such as cowls and hoods to minimise light spill to boundary features and as such is considered to have negligible impacts on barbastelle.
- 3.3.26 The BESS will produce low level noise, however limited research is available investigating how this may affect barbastelle, or bats in general. It is however likely that bats perceive noise in a manner different to humans and that noise frequencies overlapping with echolocation calls are most likely to cause interference. Noise generated as a result of BESS is typically low to mid frequency range (25Hz to 2kHz) and unlikely to interact with barbastelle calls, typically between 28-46kHz. Further, considering the separation distances

between the Site and Eversden and Wimpole Woods it is unlikely to affect bats associated with the SAC.

- 3.3.27 Emerging evidence (Tinsley *et al*, 2023<sup>10</sup>) suggests that the presence of solar arrays may affect bat activity in some species, and therefore potential effects of panels on barbastelle have been investigated and are discussed below.
- 3.3.28 While studies into the effects of solar arrays on bats activity are at this time limited, with regards to barbastelle, Tinsley *et al* (2023) found no statistically significant beneficial or adverse effect resulting from the presence of solar panels on barbastelle bats. Further, measures suggested in this paper have been incorporated into the embedded scheme design including buffers from boundary features and planting to improve overall foraging resource. Further, extensive hedgerow planting is proposed to strengthen and enhance bat foraging and commuting routes within the Site and immediately surrounding landscapes. Therefore, the presence of panels is not expected to have any negative effect on barbastelle associated with Eversden and Wimpole Woods SAC.

## 3.4 Screening Conclusion

- 3.4.1 The potential for LSE to occur to qualifying species features associated with Eversden and Wimpole has been screened out, and as such AA is not required.

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<sup>10</sup> Tinsley, E., Froidevaux, J. S. P., Zsebők, S., Szabadi, K. L., & Jones, G. (2023). Renewable energies and biodiversity: Impact of ground-mounted solar photovoltaic sites on bat activity. *Journal of Applied Ecology*, 60, 1752–1762. Available at: <https://doi.org/10.1111/1365-2664.14474> [Last Accessed: 24 July 2025]

## 4.0 IN-COMBINATION ASSESSMENT

### 4.1 Overview

- 4.1.1 Regulation 63 requires that the HRA process must consider the potential for a LSE of a proposed development either alone or in combination with other plans and projects. While no significant effect has been identified for the Scheme alone, an assessment of non-significant effects that could combine with non-significant effects of other schemes to result in a significant effect on Eversden and Wimpole Woods SAC must be undertaken.
- 4.1.2 In-combination effects must be:
- Practically feasible; and,
  - Interpreted and applied in a proportionate manner.
- 4.1.3 Developments screened for in-combination effects are presented in **Table 2**. The methods by which these schemes were identified are outlined in Section 4.5 of **ES Vol 1 Chapter 4: EIA Methodology [EN010141/DR/6.1]** and set out within **ES Vol 2 Appendix 4-5: Short List of Other Development [EN010141/DR/6.2]**.

### 4.2 In-combination Assessment

- 4.2.1 In-combination effects could only occur where effects on a European site from other developments interact with effects produced by the Scheme. As such, only effects where there the potential for disruption to flightlines between maternity and transitional or hibernation roosts have been considered as this is the only potential effect considered possible as a result of the Scheme. Due to distance from the Scheme, A428 Black Cat to Caxton Gibbet Road Improvement scheme and East West Rail (EWR) - Bedford to Cambridge and Western improvements were not considered to have potential of interactions with the Scheme that could affect designated features of Eversden and Wimpole Woods SAC.

- 4.2.2 Additionally, schemes where no ecological information has been submitted are also not considered on the basis that there is not sufficient information to make an assessment. Principally, this applies to screening requests. It is considered that at the point of a formal application documents in support of the developments will be available and can form part of the in-combination assessment for these developments.
- 4.2.3 None of the remaining developments had Information to Inform a Habitat Regulations Assessment reports submitted as part of the application, however none of the developments identified negative impacts on foraging and commuting bats as part of the ecological assessments submitted.
- 4.2.4 As such, the Scheme is not considered to result in in-combination effects with any of the identified schemes.

**Table 2: Schemes Considered for In-combination effects**

Project Name	Location	Distance from Order Limits (km)	Development Description	LPA and Planning Ref	Status Summary
Proposed Solar Farm on Land to the South of High Wood	Land South Of High Wood Kimbolton Road Hail Weston	0	EIA Screening Opinion in relation to the proposed development of "solar farm and associated development"	HDC 21/70086/SCRE	Further LVIA info is required in order to inform a screening opinion
High Wood Solar, Staploe	Land East And West Of Little Staughton Solar Farm Kimbolton Road Hail Weston	0	Installation of solar farm (generating up to 50MW) comprising the provision of photovoltaic panels, 18no. inverters, 4no. switchgear housings and 3no. transformer stations together with hardstanding, landscaping, access alterations, fencing and associated works	HDC 22/01813/FUL	Submitted 19th August 2022, under determination
Bassmead Manor & Home Wood , Hail Weston Solar Farm	Land East And West Of Little Staughton Solar Farm Kimbolton Road Hail Weston	0	Solar Farm and associated development, to include perimeter fencing, access tracks, transformer stations and associated infrastructure. (Cross Local Authority boundary scheme between Huntingdonshire DC & Bedford Borough Council)	BBC 22/01998/MAF	Submitted 13th September 2022. Under determination
Land To The South And North Of Bushmead Road Staploe	Land To The South And North Of Bushmead Road Staploe	0	Request for screening opinion in respect of the installation of ground mounted solar array and Battery Energy Storage System	BBC 21/02240/EIASCR	EIA screening request.
	Land To The South And North Of Bushmead Road Staploe	0	Installation of a solar array of up to 49.9MW AC, comprising; ground mounted fixed tilt bifacial solar panels; string inverters; transformers; storage containers; underground cables and conduits; access tracks; security fences; CCTV; temporary construction compound and associated infrastructure; planting scheme; creation of, and alterations to, vehicular access; and other associated works.	BBC 24/00858/MAF	Approved on 31/01/2025

Project Name	Location	Distance from Order Limits (km)	Development Description	LPA and Planning Ref	Status Summary
Cobholden Farm Battery Energy Storage System	South of Bushmead Road	0	'Installation of a Battery Energy Storage System (BESS) comprising; self contained battery modules on skids; transformers; Power Conversion System Modules; Control Building; electrical connection compound including substation; control and storage containers; underground cables and conduits; access track; security fence; acoustic fence; temporary construction compound and associated infrastructure; bunded drainage basin, planting scheme and other associated works.	BBC 22/01828/MAF	Approved, under construction
East West Rail (EWR) - Bedford to Cambridge and Western improvements	Between Oxford and Cambridge	6km	Major railway project - NSIP	BBC & HDC N/A	NSIP at pre-application stage
A428 Black Cat to Caxton Gibbet Road Improvement scheme	A428 Black Cat to Caxton Gibbet Road	6.6km	Road improvement scheme - NSIP	HDC TR010044	Granted development consent by the Secretary of State for Transport. Construction underway.



## 5.0 CONCLUSION

### 5.1 Overview

- 5.1.1 An assessment of the potential for LSE on Eversden and Wimpole Woods SAC resulting from the construction, operation and/ or decommissioning of the Scheme was undertaken. No LSEs were identified for the scheme alone, or in combination with other identified schemes and as such Appropriate Assessment is not required
- 5.1.2 As such, it is concluded that the Scheme will not prevent Eversden and Wimpole Woods SAC from achieving favourable conservation status with regards to its conservation objectives, and so will not result in any adverse effect to the integrity of the European site.

## **Appendix A: Eversden and Wimpole Woods SAC Conservation Objectives**

**European Site Conservation Objectives for  
Eversden and Wimpole Woods Special Area of  
Conservation  
Site code: UK0030331**



With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

**Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;**

- The extent and distribution of the habitats of qualifying species
- The structure and function of the habitats of qualifying species
- The supporting processes on which the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

This document should be read in conjunction with the accompanying *Supplementary Advice* document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.

**Qualifying Features:**

S1308. *Barbastella barbastellus*; Barbastelle bat

## Explanatory Notes: European Site Conservation Objectives

These Conservation Objectives are those referred to in the Conservation of Habitats and Species Regulations 2017 as amended from time to time (the “Habitats Regulations”). They must be considered when a competent authority is required to make a ‘Habitats Regulations Assessment’, including an Appropriate Assessment, under the relevant parts of this legislation.

These Conservation Objectives and the accompanying Supplementary Advice (where available) will also provide a framework to inform the measures needed to conserve or restore the European Site and the prevention of deterioration or significant disturbance of its qualifying features.

These Conservation Objectives are set for each habitat or species of a [Special Area of Conservation \(SAC\)](#). Where the objectives are met, the site will be considered to exhibit a high degree of integrity and to be contributing to achieving Favourable Conservation Status for that species or habitat type at a UK level. The term ‘favourable conservation status’ is defined in regulation 3 of the Habitats Regulations.

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