Shadow Habitats Regulations Assessment

Land south of Harepath Hill, Seaton

Baker Estates

August 2025

Report reference	Report Status	Date	Prepared by	Authorised
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1 Introduction and background

1.1 Background

1.1.1 This document has been prepared by EAD Ecology on behalf of Baker Estates. It provides a 'Shadow' Habitats Regulations Assessment (HRA) of a proposed residential development at land to the south of Harepath Hill, Seaton, Devon ('the Proposed Development', refer to Figures 1 -3) with respect to relevant 'European Designated Sites' ('European Sites').

1.1.2 HRA is required under the Conservation of Habitats and Species Regulations 2017 (as amended; the 'Habitats Regulations')[1] for any proposed plan or project, which may have a significant effect on one or more European Sites and which is not necessary for the management of those site(s).

1.1.3 The Natural England (2019) Standard on HRA[2] describes the process as follows:

'For all plans and projects which are not wholly directly connected with or necessary to the conservation management of the site's qualifying features, this will include formal screening for any Likely Significant Effects (either alone or in combination with other plans or projects). Where these effects cannot be excluded, assessing them in more detail through an appropriate assessment (AA) is required to ascertain that an adverse effect on the integrity of the site can be ruled out. Where such an adverse effect on the site cannot be ruled out, and no alternative solutions can be identified, then the project can only then proceed if there are imperative reasons of over-riding public interest and if the necessary compensatory measures can be secured'.

1.1.4 The Proposed Development is located within the East Devon District Council (EDDC) administrative area; an Outline Planning Application for the Proposed Development has been submitted to EDDC by Baker Estates. It is the role of EDDC as Competent Authority for the Outline Planning Application under Regulation 7 of the Habitats Regulations, to determine whether an 'Appropriate Assessment' of the Proposed Development is required (Regulation 63 of the Habitats Regulations). If EDDC considers that there is a Likely Significant Effect, it is subsequently EDDC's duty to undertake the 'Appropriate Assessment'. This Shadow HRA provides the information that EDDC may reasonably require to determine whether there is a Likely Significant Effect of the Proposed Development, and to undertake an Appropriate Assessment, where a Likely Significant Effect has been identified.

1.1.5 This Shadow HRA mirrors the format set out by EDDC in their Shadow HRA template (EDDC, 2022). This report format allows all information to be set out more clearly, cross-referenced to Figures and Appendices and allows for the assessment of other European Sites (in addition to Beer Quarry and Caves Special Area of Conservation) that could be affected by the Proposed Development.

1.1.6 An Ecological Impact Assessment (EcIA; EAD Ecology, 2025) produced for the Proposed Development has also been submitted with the Outline Planning Application; this should be read in conjunction with this Shadow HRA.

1.2 Proposed development

1.2.1 The Proposed Development comprises a residential development comprising of up to 72 dwellings, the formation of vehicular and pedestrian access, public open space and other

[1] Including amendments resulting from the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019
[2] Natural England (2019). Natural England Standard – Habitats Regulations Assessment (HRA) Standard. NE, Peterborough.

associated infrastructure; refer to Figure 2. The Outline Planning Application seeks to address the principle of development and does not address the details (layout, scale and appearance).

1.3 Policy and legislation relating to European Sites

1.3.1 HRA is required under the Conservation of Habitats and Species Regulations 2017 (as amended) for any proposed plan or project, which may have a significant effect on one or more European Sites and which is not necessary for the management of those site(s). European Sites are Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and candidate Special Areas of Conservation (cSACs). In the UK, they are collectively referred to as the 'National Site Network'[3].

1.3.2 Paragraph 194 of the National Planning Policy Framework (NPPF, 2024) and the Government Circular ODPM06/2005 advise that potential SPAs (pSPAs) and Ramsar Sites (designated under the Ramsar Convention on Wetlands 1971) should be treated in the same way as SPAs, SACs and cSACs, although they are not European Sites as a matter of law.

1.4 Approach to the HRA

1.4.1 There is no standard methodology or Government guidance (for England) that specifies the format and content of an HRA. Table 1.1 below sets out the HRA process followed in this document. The methodology was prepared with reference to the following guidance documents:

- Tyldesley D. and Chapman C. (2013). The Habitats Regulations Assessment Handbook. DTA Publications Ltd (including subsequent updates).
- DCLG (2006). Planning for the Protection of European Sites: Appropriate Assessment. Guidance for Regional Spatial Strategies and Local Development Documents.
- European Commission (2001). Assessment of plans and projects significantly affecting Natura 2000 sites.
- English Nature (1997) Habitats Regulations Guidance Note.
- Natural England (2017). Habitats Regulations Assessment Standard.
- Appropriate Assessment: Guidance on the use of Habitats Regulations Assessment. https://www.gov.uk/guidance/appropriate-assessment Ministry of Housing, Communities and Local Government, 22 July 2019.

Table 1.1. Stages of HRA

Stage		**Tasks**
Stage 1 'Screening'	Evidence gathering and Consultation	• Determine whether the project should be subject to HRA. • Identify the European sites that should be considered. • Collect information on relevant European sites, their Qualifying Features and Conservation Objectives • Gather baseline information on pertinent qualifying features of the European Sites within the zone of influence of the Project.
	Screening assessment for	• Identify whether Project is 'likely to have a significant effect' on a European site without

[3]https://www.gov.uk/government/publications/changes-to-the-habitats-regulations-2017/changes-to-the-habitats-regulations-2017

Table 1.1. Stages of HRA

Stage		Tasks
	Likely Significant Effect (LSE)	avoidance or reduction measures, alone or in combination with other plans or projects. Where no LSE are identified, sites may be screened out of the need for further assessment • The approach to considering mitigation measures for LSE Screening considers the judgement of the European Court, case C-323/17, on 12 April 2018[4]. This judgement concludes that it is not appropriate, at the screening stage, to take account of the measures intended to avoid or reduce the harmful effects of the project on that site. • Only measures that constitute part of the project design and are not intended to avoid or reduce effects on European site features are therefore considered at Stage 1 Screening.
Stage 2 'Appropriate Assessment'	Avoidance and mitigation measures.	• Where any possible 'LSE' arising from the Project are identified, apply avoidance and mitigation measures to avoid effects.
	Ascertaining the effect on site integrity	• Undertake detailed assessment of likelihood and severity of the perceived impact on the integrity of the conservation objectives of any European sites 'screened in' during HRA Screening
	In combination effects	• Assess the effects of the Project on the conservation objectives of any European sites in-combination with other plans or projects.
	Conclusion on effect on site integrity	• Conclude no effect on site integrity where appropriate avoidance/mitigation is applied or proceed to 'Assessment of alternative solutions' and 'IROPI' (Stages 3 and 4)
Stage 3	Alternative Solutions	• Decide whether there are alternative solutions, which would avoid or have a lesser effect on the European Site. • If there are alternative viable solutions to a potentially damaging plan or project, it will need to be changed or refused.
Stage 4	Imperative reasons of overriding public interest and compensatory measures	• Consider imperative reasons of overriding public interest and secure compensatory measures. Plans or projects may proceed for imperative reasons of overriding public interest if compensatory measures are secured.

[4] ECLI:EU:C: 2018:244 Case C-323/17.Judgment of the Court (Seventh Chamber) of 12 April 2018. People Over Wind and Peter Sweetman v Coillte Teoranta.

1.4.2 This Shadow HRA presents the results of Stages 1 and 2 of this process ('Screening' and 'Appropriate Assessment') in relation to the Proposed Development; refer to Section 1.2. As set out in this document, it will not be necessary for the HRA to progress to Stages 3 and 4.

Evidence gathering

1.4.3 A range of information sources have been consulted in the preparation of this report. Taken together the following information sources represent sufficiently detailed baseline and design information with which to undertake and complete HRA Stages 1 and 2:

- The Defra MAGIC website [www.magic.defra.gov.uk] regarding the location of European Sites.
- Information on designated sites from the JNCC website [www.jncc.defra.gov.uk].
- Liley, D. & Underhill- Day, J. (2012) Habitats Regulations Assessment of the East Devon Local Plan Submission for Examination. Footprint Ecology.
- East Devon District Council (2016) East Devon Local Plan 2013 to 2031. EDDC.
- Devon County Council (2022). Beer Quarry and Caves Special Area of Conservation (SAC). Habitats Regulations Assessment Guidance.
- Desk study data from Devon Biodiversity Records Centre and Devon Bat Group, documented in the Ecological Impact Assessment (EcIA) report for the Proposed Development (EAD Ecology, 2025).
- Encompass Ecology (2014). Bat activity assessment and mitigation strategy. Land off Rowan Drive, Seaton.
- Mathews, F. (2014). Proof of evidence against the refusal of planning permission of land east of Harepath Road, Seaton. EDDC ref: 12/1185/MOUT.
- Mathews, F. (2013). Objection to Land East of Harepath Road, Seaton (13/1641/MOUT and APP/U1105/A/13/2202124).
- Natural England (2024) River Axe Special Area of Conservation Evidence Pack. Technical Information Note TIN193.
- Richard Green Ecology (2015) Interim Ecological Survey Report – Land adjacent to Harepath Road, Seaton, Devon. Ecological Assessment – 15/2188/MOUT.
- Ecological surveys of the Proposed Development undertaken by EAD Ecology between 2019 - 2025 (EAD Ecology, 2025).
- EAD Ecology (2023a) Ecological Impact Assessment – Land east and west of Harepath Road, Seaton, Devon. Report for Baker Estates.
- EAD Ecology (2023b) Shadow Habitat Regulations Assessment– Land east and west of Harepath Road, Seaton, Devon. Report for Baker Estates.
- EAD Ecology (2025) Ecological Impact Assessment – Land south of Harepath Hill, Seaton, Devon. Report for Baker Estates.
- East Devon District Council (2024) Habitats Regulations Assessment; Land Adjacent to Harepath Road, Seaton, Devon.

2 European Sites considered

2.1 Introduction

2.1.1 This section identifies the European Sites that could be affected by the Proposed Development and presents information regarding these Sites.

2.2 European Sites considered

2.2.1 European Sites within 10km of the Proposed Development have been considered within this assessment. The Natural England MAGIC website identified four European Sites within the 10km search area; refer to Table 2.1 and Figure 4.

Table 2.1: European Sites within 10km

Site name	Nature conservation designation	Reason for designation	Approximate distance and direction from Proposed Development
River Axe	SAC	Annex I habitats that are a primary reason for selection of this site; • Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitricho-Batrachion* vegetation Annex II species present as a qualifying feature, but not a primary reason for site selection; • Sea lamprey; *Petromyzon marinus* • Brook lamprey; *Lampetra planeri* • Bullhead; *Cottus gobio*	1.7km northeast
Sidmouth to West Bay	SAC	Annex I habitats that are a primary reason for selection of this site; • Vegetated sea cliffs of the Atlantic and Baltic Coasts • *Tilio-Acerion* forests of slopes, screes and ravines Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site; • Annual vegetation of drift lines	2.2km southeast and 2.1km southwest
Beer Quarry and Caves	SAC	Annex II species that are a primary reason for selection of this site; • Bechstein's bat; *Myotis bechsteinii* Annex II species present as a qualifying feature, but not a primary reason for site selection: • Lesser horseshoe bat; *Rhinolophus hipposideros*	3.1km southwest

Table 2.1: European Sites within 10km

Site name	Nature conservation designation	Reason for designation	Approximate distance and direction from Proposed Development
		• Greater horseshoe bat*; Rhinolophus ferrumequinum*	
Lyme Bay and Torbay	Marine SAC	Annex I habitats that are a primary reason for selection of this site; • Reefs. • Submerged or partially submerged sea caves.	1.9km south

2.3 Conservation Objectives

2.3.1 The specific Conservation Objectives for each of the European Sites are presented in Appendix 2. The overarching objective for all European sites is to:

'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.'

3 Stage 1: Screening of Likely Significant Effects

3.1 Scope

3.1.1 This section presents the Screening Assessment of the Proposed Development (refer to Table 1.1.) against the Conservation Objectives of the European Sites listed in Table 2.1 and Appendix 2. The aim of the screening exercise is to:

- 'Screen-out' impacts that would not have a Likely Significant Effect (LSE) and do not require further assessment.
- 'Screen-in' impacts where Likely Significant Effects cannot be ruled out, so that these impacts can be assessed further i.e., Stage 2 Appropriate Assessment.

3.1.2 The following impact pathways have been considered within the Screening Assessment:

Construction impacts

Habitat loss, modification and fragmentation

3.1.3 Construction impacts concerning habitat loss, modification and fragmentation could affect bat populations associated with Beer Quarry and Caves SAC specifically:

- Severance or disturbance of linear features used for navigating or commuting;
- Disturbance from construction illumination causing bats to change their use of an area / habitat; and
- Loss, damage, restriction or disturbance of a pinch point.

Water quality

3.1.4 River Axe SAC could be affected by water quality impacts during construction.

Operational impacts

Habitat loss, modification and fragmentation

3.1.5 Operation impacts concerning habitat loss, modification and fragmentation could affect bat populations associated with Beer Quarry and Caves SAC specifically;

- Severance or disturbance of linear features used for navigating or commuting;
- Disturbance from new illumination causing bats to change their use of an area / habitat; and
- Loss, damage, restriction or disturbance of a pinch point.

Increased risk of collision through increased traffic

3.1.6 Impacts could affect bat populations associated with Beer Quarry and Caves SAC as a result of collisions with traffic from the Proposed Development.

Water quality

3.1.7 River Axe SAC could be affected by water quality impacts during operation through foul-water discharge.

3.1.8 These potential effects are considered further in Section 3.2. All other potential impact pathways for these European Sites have been scoped out of the Screening Assessment. Furthermore, no realistic impact pathways have been identified for Sidmouth to West Bay SAC or Lyme Bay and Torbay SAC; these European Sites have not been considered further within the Screening Assessment.

3.1.9 Potential avoidance and mitigation measures have not been considered at this stage, in accordance with the European Court judgement [C-323/17 (12 April 2018)]. This concluded that it is not appropriate, at the Screening stage, to take account of the measures intended to avoid or reduce the harmful effects of the project on a European Site.

3.2 Screening of potential effects:

River Axe SAC

Construction effects: water quality

3.2.1 There is a potential risk that the water quality of the River Axe SAC could be affected by pollutants leaving the site during construction, for example as a result of groundwater and / or surface-water contamination (*e.g*. as a result of surface runoff contaminated with silt, hydrocarbons or other construction materials, or from an accidental fuel or concrete spill) entering hydrologically connected watercourses. However, the Proposed Development lies outside of River Axe SAC catchment (River Axe Catchment Plan; refer to Appendix 2) and any run-off would enter the River Axe downstream of the SAC boundary, which lies above the tidal limit. Construction would also be undertaken in accordance with standard pollution-prevention guidance, which would be specified within the Construction Environmental Management Plan (CEMP). No Likely Significant Effect is identified. EDDC can screen out the requirement for Appropriate Assessment in respect of this impact pathway.

Operation effects: water quality

3.2.2 The Proposed Development is located outside of the catchment of the River Axe SAC (River Axe Catchment Plan; refer Appendix 2). Surface-water would be managed through the proposed SUDS, which form an integral part of the Proposed Development. Foul water associated with the Proposed Development would ultimately discharge and be processed at the Seaton Sewage Treatment Works, which discharges into the River Axe, downstream and outside of River Axe SAC catchment. The additional sewage associated with the Proposed Development would be managed through existing sewage treatment infrastructure and in accordance with existing legislative controls, including discharge consents. There would be a nugatory effect on functionally-linked habitat for sea lamprey, a migratory fish species for which the SAC is designated *i.e*. an indiscernible effect on the estuarine area occurring downstream of the SAC boundary through which sea lamprey would migrate. No Likely Significant Effect is identified for water quality. EDDC can screen out the requirement for Appropriate Assessment in respect of this impact pathway.

Beer Quarry and Caves SAC

Construction effects: Habitat loss, modification and fragmentation

3.2.3 The Proposed Development lies within the Beer Quarry and Caves SAC Consultation Zone; refer to Appendix 3. The SAC comprises Beer Quarry and Caves Sites of Special Scientific Interest (SSSI), the closest component of which lies 3.1km to the southwest of the Proposed Development. This site has an extensive series of caves and abandoned mines, which support important populations of hibernating greater horseshoe bats, lesser horseshoe bats and Bechstein's bats. The bat populations are dependent upon a much wider area outside of the SAC boundary (functionally-linked land), which provides foraging habitat and commuting routes and supports nearby summer maternity roosts.

3.2.4 The Proposed Development falls within the greater horseshoe bat, lesser horseshoe bat and Bechstein's bat Sustenance Zones (Devon County Council, 2022) linked to the SAC. These are defined as areas around Key Roosts (distance varies between species), which include critical foraging and commuting habitat. The Proposed Development lies within greater horseshoe, lesser

horseshoe and Bechstein's bat Landscape Connectivity Zones. These zones are '*the area that includes a complex network of Commuting Routes likely to be used by the SAC population of bats. Provides connectivity between Key Roosts and Other Roosts (including those currently unrecorded). Helps to provide connectivity to more distant roosts and therefore maintain genetic diversity and ensure resilience*.' The Proposed Development also lies within greater and lesser horseshoe bat 'Pinch Points'. These are known or potential commuting routes which are restricted *e.g*., due to urban encroachment or proximity to the sea / estuaries; refer to Appendix 3. The greater and lesser horseshoe bat 'Pinch Point' between Seaton and Colyton is where horseshoe bats are known to be moving from the SAC / SSSI to land to the east (Axe / Seaton marshes) and beyond. As the Proposed Development lies over 3.1km from the SAC, there would be no damage / disturbance or direct impacts to the SAC roosts or other key roost(s).

3.2.5 Due to the location of the Proposed Development within the Sustenance Zones, Landscape Connectivity Zones and within a greater and lesser horseshoe bat Pinch Point, the loss of habitat during site clearance could cause disruption of flight lines for bats from the SAC. This could impact the Pinch Point and inhibit the movement of bats within their Landscape Connectivity Zone and between other key roosts in the region. A Likely Significant Effect on the Beer Quarry and Caves SAC is identified. Appropriate Assessment in respect of this impact pathway will be required by EDDC.

3.2.6 In addition to habitat removal, construction lighting has the potential to disrupt horseshoe and Bechstein's bats commuting and foraging through and along the Proposed Development site boundaries, including retained hedgerows, which could in turn impede their access to foraging sites. A Likely Significant Effect on the Beer Quarry and Caves SAC is identified. Appropriate Assessment in respect of this impact pathway will be required by EDDC.

Operation effects: Habitat loss, modification and fragmentation

3.2.7 Similar potential effects on habitat loss, modification and fragmentation could occur during the operational phase of the Proposed Development for bats from the Beer Quarry and Caves SAC. Lighting associated with the development also has the potential to degrade the value of adjacent foraging and commuting habitat for these bats and could restrict the Pinch Point between Seaton and Colyford. Horseshoe and *Myotis* bats are known to be sensitive to light levels and will avoid lit areas (Stone, 2013). A Likely Significant Effect on the Beer Quarry and Caves SAC is identified. Appropriate Assessment in respect of this impact pathway will be required by EDDC.

Operation effects: Increased risk of collision through increased traffic

3.2.8 The Proposed Development would result in an increase in traffic movements within the development footprint. However, new roads within the Proposed Development would be subject to low traffic volumes which would be travelling at low speeds, therefore the risk of bat mortality associated with traffic movements is therefore assessed as being low. In addition, there is currently a network of existing roads surrounding the Proposed Development; the effects of increased traffic from the Proposed Development is considered to be nugatory. Accordingly, no Likely Significant Effect is identified. EDDC can screen out the requirement for Appropriate Assessment in respect of this impact pathway.

3.3 Conclusion to the Screening Assessment

3.3.1 Table 3.1 provides a summary of the Stage 1 Screening Assessment of the Proposed Development.

Table 3.1: Summary of screening assessment

Site	Interest Feature	Potential impact – alone and in-combination	Likely significant effect?
River Axe SAC	Annex I habitats that are a primary reason for selection of this site: • Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitricho-Batrachion* vegetation. Annex II species present as a qualifying feature, but not a primary reason for site selection: • Sea lamprey; *Petromyzon marinus.* • Brook lamprey; *Lampetra planeri.* • Bullhead; *Cottus gobio.*	Construction effects: Water quality	No
		Operation impacts: Water quality	
Beer Quarry and Caves SAC	Annex II species that are a primary reason for selection of this site; • Bechstein's bat; *Myotis bechsteinii.* Annex II species present as a qualifying feature, but not a primary reason for site selection: • Lesser horseshoe bat; *Rhinolophus hipposideros.* • Greater horseshoe bat; *Rhinolophus ferrumequinum.*	Construction effects: Habitat loss, modification and fragmentation, including through construction lighting.	Yes
		Operation effects: Habitat loss, modification and fragmentation, including through lighting.	Yes
		Operation effects: Increased risk of collision through increased traffic	No

3.3.2 The HRA Screening Assessment concludes that Likely Significant Effects of the Proposed Development could occur on the Beer Quarry and Caves SAC from habitat loss, modification and fragmentation,including from lightingduring construction and operation, and potentially in-combination with other plans and projects. Accordingly, EDDC will be required to undertake an Appropriate Assessment of these potential effects for the Proposed Development, both in-isolation and in-combination. Further information to inform the assessment is provided in Section 4.

3.3.3 No Likely Significant Effects of the Proposed Development have been identified on the River Axe SAC as a result of water quality effects, or on the Beer Quarry and Caves SAC, as a result of increased risk of collision through increased traffic. Consequently, the requirement for an 'Appropriate Assessment' can be 'screened out' by EDDC in respect of these impact pathways for these European Sites.

4 Stage 2: Appropriate Assessment

4.1 Introduction

4.1.1 This section provides a Shadow 'Appropriate Assessment' of the likely significant effects of the Proposed Development. The assessment identifies avoidance and/or mitigation measures that would be provided, and considers the potential effects of the Proposed Development on the Conservation Objectives of the European Sites, alone and in-combination with other plans or projects.

4.2 Beer Quarry and Caves SAC

Evidence base

HRA: East Devon Local Plan and Devon County Council (2022) Beer Quarry and Caves Special Area of Conservation (SAC) Habitats Regulations Assessment Guidance.

4.2.1 The HRA of the Local Plan identified that for Strategy 25 (Development at Seaton), urbanisation could result in loss of supporting habitat, fragmentation and isolation and that '*in the areas surrounding Beer Quarry and Caves SAC it will be necessary to ensure that development does not result in a loss of foraging habitat or disruption of flight lines for bats using the countryside surrounding the caves*'.

4.2.2 At the time that the HRA of the Local Plan was produced, no consultation zones had been developed that encompassed the important commuting and foraging habitats for the bat species outside the SAC. HRA planning guidance has since been issued (Devon County Council, 2022), which identifies the consultation zones (comprising Key Roosts, Sustenance Zones, Landscape Connectivity Zones and 'Pinch Points') for Bechstein's, lesser and greater horseshoe bats and the survey requirements for development proposals within the identified zones.

Ecological Impact Assessment: desk study and site surveys

4.2.3 Full details of the results of desk study and surveys undertaken to inform the Shadow HRA of the Proposed Development are presented in the EcIA report (EAD Ecology, 2025) submitted with the Outline Planning Application. Reference should be made to the EcIA report and accompanying appendices for full details of the desk study, survey approach and results:

- Section 2.4: Desk study and bat activity survey results.
- Appendix 12: Bat activity survey results.
- Appendix 13: Bat roost survey results.

4.2.4 A summary of results relevant to the HRA is provided below.

Desk study

4.2.5 As set out in the Stage 1 Screening Assessment, Beer Quarry and Caves SAC comprises Beer Quarry and Caves SSSI, of which the closest component lies 3.1km to the southwest of the Proposed Development; refer to Figure 4. This site has an extensive series of caves, and is important for its population of hibernating greater horseshoe, lesser horseshoe and Bechstein's bats. Eight species of bat have been recorded hibernating within the caves, and it is also used as a mating roost (Mathews, 2013). In January 2025, a full survey of all accessible caves in the SAC was carried out as part of the annual hibernation count; 263 greater horseshoe and 105 lesser horseshoe bats were recorded during the winter counts (Beer Quarry Caves, 2025). Natural England's historical

hibernation count data (Stephen Panks, Natural England; *pers comm*.) indicates that Bechstein's bat numbers have remained low, but stable, since they were first recorded in 1966. Overall, greater and lesser horseshoe bat numbers have steadily increased during the annual counts. It is possible that crevice-dwelling bats, including Bechstein's bat, are under-recorded to some extent during these counts.

4.2.6 As outlined in Paragraph 3.2.43.2.4, the Proposed Development site lies within greater horseshoe bat, lesser horseshoe bat and Bechstein's Sustenance Zones. It also lies within greater horseshoe, lesser horseshoe and Bechstein's Landscape Connectivity Zones and within greater and lesser horseshoe bat 'Pinch Points'.

4.2.7 Desk study data from Devon Bat Group and Devon Biodiversity Records Centre have identified a number of lesser and greater horseshoe bat roosts within 4km of the Proposed Development; refer to Figure 6. The amount of available information for each roost is variable, however, the nearest roost to the Proposed Development is a whiskered bat maternity roost, lesser horseshoe bat maternity and hibernation roost, and greater horseshoe bat, common pipistrelle and grey long-eared bat roost (all in the same property; the status of the greater horseshoe, common pipistrelle and grey long-eared roost is unknown) located approximately 350m north-east of the Proposed Development site boundary.

4.2.8 Bechstein's bat is a gleaning bat, with most foraging occurring in closed-canopy woodland (Harris and Yalden, 2008). Studies have shown that foraging occurs close to the roosting site, with bats rarely flying more than 1.5km between roost and feeding site (Schofield and Morris, 2000, Palmer *et al*., 2013). Information on exact locations of Bechstein's maternity roosts is scarce as individuals switch roost sites often and it is difficult to distinguish the species call from that of other *Myotis* bats. However, it is considered likely that closed-canopy woodland within the vicinity of a roost would be utilised by Bechstein's bats. There are occasional records of this species from bat catching surveys at Holyford Woods (Mathews, 2014), approximately 2.5km northeast of the Beer Quarry and Caves SAC and approximately 0.6km northwest from the Proposed Development.

4.2.9 Greater horseshoe bat maternity colonies have been recorded at Branscombe (approximately 5km southwest of the Proposed Development) and occasionally Axmouth (approximately 1.5km southeast of the Proposed Development). There are numerous lesser horseshoe bat maternity colonies within East Devon Area of Outstanding Natural Beauty (AONB), including in Colyton, Musbury and Holyford (Encompass Ecology, 2014 and Mathews 2014).

4.2.10 Although the Proposed Development is over 3km from the Beer Quarry and Caves SAC, it is located directly between this hibernation site and important foraging habitat located at Seaton Marshes County Wildlife Site (CWS) and Axe Estuary and Marshes CWS. Bats are likely to move between Beer Quarry and Caves SAC and the Axe Estuary in spring and autumn, as well as between the estuary and other roosts, including maternity roosts throughout the bat-active period. Furthermore, it is likely that bats will be moving between the SAC and roosting / foraging sites in Dorset; there is evidence for this from previous recaptures of ringed bats (Encompass Ecology, 2014; Matthews, 2013 & 2014).

Site surveys

4.2.11 The Proposed Development site lies on the northern edge of Seaton and comprised two arable fields. Field boundaries were bordered by species-rich and species-poor hedgerows, several with mature trees. Scattered scrub and tall ruderal habitat were also present along the northwest boundary.

4.2.12 Bat activity surveys of the Proposed Development site and a wider survey area to the northeast, comprising night-time bat walkover and static detector surveys, were undertaken between May - October 2024 and in April 2025, with winter static detector surveys between November 2024 - March 2025, to provide a full year of survey data. Full results of the surveys are presented in the EcIA Report. A summary is also provided below; refer also to Figure 5:

Myotis bats

- Based on the analysis of the survey data, the southern and eastern boundaries of the site are considered to be *Myotis* bat commuting and occasional foraging habitat.
- Activity recorded within the Proposed Development site over the winter period (November-March) was typically much lower than that recorded within the active period (April-October). However, the survey results showed that *Myotis* bats were using the Proposed Development site during the hibernation period.

Greater horseshoe bats

- The trend in data appears to show a general decrease in greater horseshoe bat activity from June-August. This decrease in activity in July and August could be attributed to:
  - the lack of grazed pasture within the site, which is greater horseshoe preferred foraging habitat at this time (Duverge and Jones, 1994); and
  - the absence of a nearby maternity roost.
- Despite a reduced level of activity during the greater horseshoe bat maternity period (June-August), persistent activity was prevalent within the Proposed Development site. Therefore, it is considered likely that although the site is not primary foraging habitat for greater horseshoes bats, it is used throughout the year for commuting and occasional foraging.
- Reduced activity levels were observed during the winter activity surveys. However, greater horseshoe bats were shown to be using the Proposed Development site in November - March albeit in considerably lower numbers than typically recorded during the active period. The spatial distribution of greater horseshoe bat activity was similar in winter to summer, with higher activity levels observed along the northern and southern boundaries.

Lesser horseshoe bats

- The northern and southern boundaries are considered to be lesser horseshoe bat commuting and occasional foraging habitat during the active period. Throughout the winter period, lesser horseshoe bat activity was more prominent along the southern boundary.
- Reduced activity levels were observed during the winter activity surveys. However, lesser horseshoe bats were shown to be using the site in November-March, albeit in lower numbers than typically recorded during the active period.
- Foraging activity was recorded in May and March in the south-west corner of the site.
- Low activity was generally recorded across the site during the maternity period (June-August). However, peaks in activity suggest that lesser horseshoe bats primarily use the site as they transition to/from a hibernation roost in the Spring / Autumn.

4.2.13 The results of the bat activity surveys undertaken from 2024 - 2025 summarised above reflect the outcomes of the previous surveys undertaken of the site from 2019 - 2020 (EAD Ecology 2023a and 2023b). Both survey data sets concluded that the northern and southern boundary features (hedgerows 1 & 2, and hedgerows 3, 4, & 6; Figure 5) provide likely greater horseshoe commuting routes; the northern boundary feature (hedgerows 1 & 2) provides a likely lesser horseshoe bat commuting route, and the southern boundary (hedgerows 3, 4 & 6) provides a likely *Myotis* bat commuting route. Analysis of the 2024 – 2025 dataset also concluded that the eastern boundary

feature (hedgerow 7) also provides a likely secondary *Myotis* bat commuting route, which was not identified in analysis of the earlier dataset.

4.2.14 The central hedgerow (hedgerow 5; Figure 5) and the western site boundary (comprising only fence line) were not identified as key commuting or foraging routes for either horseshoe or *Myotis* bats during the bat activity surveys undertaken in 2019 – 2020 or 2024 – 2025.

4.2.15 The surveys undertaken are considered to provide sufficient information to inform the Appropriate Assessment of the Proposed Development.

Baseline lighting conditions

4.2.16 No existing light sources are present within the Proposed Development site, and the majority of the area can be assumed to be largely dark (>0.5 lux), with the exception of several locations in which adjacent offsite light sources are likely to be resulting in some level of light spill. Harepath Road, to the immediate east of the Proposed Development, is lit with street lighting, which continues south into Seaton, and stops just before the junction with the A3052 / Harepath Hill, at its northern extent; this lighting is visible from the Proposed Development site. To the south of the Proposed Development there are residential properties mounted with various types of external lighting, although in some places along this boundary there is limited screening from vegetation. The A3052 / Harepath Hill to the north of the Proposed Development site is unlit, and lighting to the north and west is limited

4.2.17 Baseline lighting surveys of Harepath Road were undertaken in 2022 to inform the HRA (EAD Ecology 2023b) of an adjacent mixed-use development (Land east and west of Harepath Road, Seaton; planning reference 22/2781/MOUT). This identified that the street lighting along Harepath Road consists of a mixture of high-pressure sodium (northern extent) and LED (southern extent). The lux levels along the road were found to be significantly greater than 0.5 lux, however levels at the northern junction with Harepath Hill were <0.5 lux. The baseline lighting survey also identified that there were 'darker pockets' along Harepath Road (between columns or near where a street lamp was not in operation). It is thought that these points (even though they are above 0.5 lux) may provide crossing locations for bats from the SAC (highest lux values recorded at these potential crossing points varied from 1.08 lux – 3.75 lux). However, the lighting is currently substandard to Devon County Council (DCC) requirements and DCC have planned maintenance works to upgrade the lighting along the northern section of Harepath Road to ensure the P4 lighting class is met. This will only affect the northern section of the road where the existing high-pressure sodium lanterns will be upgraded. The existing LED lanterns on the section of Harepath Road adjacent to the Proposed Development would be unaffected and the potential darker pockets (2-4 lux) between columns would remain, which bats could continue to use to cross this road.

Proposed avoidance and mitigation measures

Construction phase: Construction management measures

4.2.18 All ecological avoidance and mitigation measures during construction would be detailed in a Construction Ecological Management Plan (CEcoMP) for the development, which would be appended to the Construction Environmental Management Plan (CEMP). This would include:

- Construction would be undertaken in accordance with BS5837:2012 'Trees in relation to construction'. Retained trees and hedgerows would be protected from potential damage during construction through the use of temporary barriers (e.g. Heras fencing), which would be installed prior to the start of construction.

- All contractors' compounds would be located a minimum of 20m away from hedgerows and outside of the 'dark' habitat corridors along the boundaries to minimise potential lighting and disturbance effects.
- Lighting would be avoided between March and October where possible, and no lighting would be left on during the night during the construction period. Any security lighting would be low-level and motion activated on short-timers.

Operation phase: Development layout / Landscape Strategy

4.2.19 The Concept Masterplan and Indicative Landscape Strategy plan (refer to Figures 2-3) for the Proposed Development have been informed by the results of the ecological surveys, to ensure that dark commuting habitat for *Myotis* and horseshoe bats would be maintained around the development post-construction, ensuring permeability for these species through their Landscape Connectivity Zones and 'Pinch Point'. This would be achieved through the creation of minimum 10m wide 'dark corridors' (<0.5 lux) along retained key commuting and foraging routes for bats on the northern and southern site boundaries, with an additional 10m landscape buffer to include natural screening in the form of new hedgerow planting before the development platform in accordance with Devon dark corridors guidance (DCC *et al,* 2022). Temporary fencing with a minimum 1.8m height would also be erected to provide screening until the new hedgerows matured. This would allow continued ecological permeability for bats associated with the SAC post-development.

4.2.20 The dark corridors / landscape buffers forming part of the Proposed Development would be planted with new native hedgerows, mixed native trees and scrub, and wildflower meadow, to create new bat foraging habitats and provide screening, which would enhance the suitability of these areas for foraging / commuting horseshoe and *Myotis* bats (refer to Figure 4).

4.2.21 A further 10m wide dark corridor with an additional 10m landscape buffer will be created on the western site boundary. This boundary, which is currently delineated by only a fence-line will also be enhanced through the planting of new native broadleaved woodland, hedgerow and scrub to create an additional north-south flightline with foraging habitat for horseshoe and *Myotis* bats (refer to Figure 4). This would ensure that north to south movement / functionality would be maintained across the Proposed Development.

Operation phase: Lighting

4.2.22 The lighting strategy for the development will be designed to ensure that light levels do not exceed 0.5 lux within the proposed 'dark corridors'. This level of lighting provides a 'dark' environment which would not deter light-sensitive bat species such as horseshoe and *Myotis* bats, and is based on studies investigating the effects of lighting on bats (e.g. Stone *et al*. 2009 and 2015).

4.2.23 The Proposed Development will be a 'dark development'; no street lighting is proposed to the roads within the Proposed Development. Private roads and drives will also remain unlit. The standalone footpaths throughout the Proposed Development are also proposed to be unlit. The new access junction from Harepath Road was previously approved as part of the application for the adjacent mixed-use development (planning reference 22/2781/MOUT), for which no additional lighting was proposed. No additional lighting on Harepath Road is anticipated for the Proposed Development.

4.2.24 In addition, the following measures would be implemented to ensure that 'dark corridors' are maintained:

- Careful consideration would be given to the locations and orientations of proposed dwellings located adjacent to the 10m landscape buffer. Where the front or rear elevations of any proposed dwellings face the dark zones, sufficient offsets would be created between the two to ensure that the <0.5lux parameter is achieved in the 10m 'dark corridor'.
- Consideration would be given to locating bungalows, rather than houses, adjacent to 10m landscape buffer, particularly where the topography of the development area is higher than the adjacent landscape buffer/dark corridor.
- It is anticipated that recessed lighting would be provided within properties adjacent to the 10m landscape buffers. Typically, downlight luminaires used in residential properties will have beam angles of 30-40 degrees. The recessed nature of downlights, and their smaller beam angles, reduces light spill compared with pendant luminaires. Consideration would also be given to window locations, head heights and size, to reduce impacts from internal light spill into the proposed dark zones.
- Private external lighting to residential properties adjacent to the 10m landscape buffers would be carefully positioned, limited in number and operated by PIR (movement) detectors. Luminaires to residential properties would be specified as downward directional with 0% Upward Light Output Ratios. If any low-level lighting is required to private drives, roads or parking courts, specialist downward directional bollard luminaires would be utilised. All external lighting would utilise LED lights sources, with warm white colour temperatures of 3000K or less.

4.2.25 Detailed analysis, including lighting calculations and assessment, will be provided at the Reserved Matters stage to demonstrate that light spill from all proposed external/internal lighting would not conflict with the <0.5lux light parameter for the dark corridors. All lighting proposals would be subject to approval by EDDC.

4.2.26 Retained and new habitats would be managed in line with the Habitat Management and Monitoring Plan (HMMP; refer to the EcIA report; EAD Ecology, 2025). The HMMP would incorporate management objectives, actions and responsibilities to ensure appropriate long-term habitat management to maximise the foraging value of the habitats provided for horseshoe and *Myotis* bats. This would include:

- Hedgerow management to promote tall hedges (minimum height of 3m) and dense growth of native woody species (minimum width of 3m) to provide functioning flight lines for bats.
- Wildflower grassland management to promote abundance of invertebrate food sources for foraging horseshoe bats.

4.2.27 It is considered that the avoidance and mitigation proposals would maintain the ecological functionality of the Proposed Development site for horseshoe and Bechstein's bats associated with the Beer Quarry and Caves SAC and would prevent the 'Pinch Point' being further restricted, so allowing the continued movement of horseshoe bats within the Landscape Connectivity Zone and between other key roosts.

Ecological monitoring

4.2.28 Construction monitoring in line with the CEcoMP, including compliance checks by a qualified ecologist, would be undertaken throughout the construction period. Post-construction monitoring of the retained and created habitats would be undertaken to ensure successful establishment and management; a monitoring protocol would be contained in the HMMP.

4.2.29 Post-construction monitoring would also be undertaken on key habitat features of importance to bats associated with Beer Quarry and Caves SAC. Lux level readings would be undertaken from baseline 'Pre-construction Monitoring Points' at locations within the proposed dark corridors along the northern, eastern, southern and western boundaries. Measurements would then be undertaken at these locations in Years 1, 3, 5 and 10 following completion of the development to ensure that 0.5 lux levels and below are still being achieved.

4.2.30 In addition to the light monitoring, automated bat activity monitoring would be undertaken in Years 1, 3, 5 and 10 to ensure that bat activity was not adversely affected by the development. This would be undertaken at the same static detector positions along the key habitat features as the baseline surveys, which would be updated pre-construction in May, July and September. A bat monitoring strategy would be included in the LEMP, along with a proposed mechanism to allow any necessary remedial action to be undertaken. The results of all monitoring would be submitted to EDDC.

Mechanisms for avoidance and mitigation delivery

4.2.31 Implementation of avoidance and mitigation measures could be secured through appropriately-worded planning conditions to ensure:

- Production and implementation of the CEcoMP and a HMMP.
- The production of a detailed lighting assessment, including lux contour plans with respect to light spill from external lighting and internal light spill from buildings, to ensure that the lighting parameters outlined within the HRA are met.

Effect on integrity of on the Beer Quarry and Caves SAC: In isolation

Preamble

4.2.32 To provide clarity, avoid duplication and accord with the Stage 2 'Appropriate Assessment' part of the Shadow HRA Template produced by EDDC (2022), impact pathways are assessed collectively for both construction and operation phases below. To allow detailed assessment, the 'Habitat loss, modification and fragmentation' impact pathway has been divided into the specific sub-sections set out in Paragraph 3.1.3; these sub-sections accord with the detailed impact pathways within the Stage 2 'Appropriate Assessment' part of the Shadow HRA Template produced by EDDC (2022).

Change in habitat quality and composition (loss or change in quality of foraging habitat)

4.2.33 Lesser horseshoe, greater horseshoe and *Myotis* bats used habitats within the Proposed Development site for occasional foraging and commuting. Given that much of the existing foraging habitat on site is considered sub-optimal (arable habitat) for these bats, the habitat creation proposals, particularly within the dark corridors / landscape buffers, would lead to a net increase in the extent of foraging habitat for horseshoe and *Myotis* bat species. The LEMP would include management objectives and actions to ensure appropriate long-term habitat management to maximise the foraging value of the habitats provided for horseshoe and *Myotis* bats. Accordingly, EDDC can conclude that there would be no adverse effect on the integrity of Beer Quarry and Caves SAC as a result of this impact pathway.

Severance or disturbance of linear features used for navigating or commuting

4.2.34 Hedgerow loss within development footprint has been minimised and the majority of hedgerows along the site boundaries identified as likely *Myotis* and / or horseshoe bat commuting routes have been retained and buffered; refer to Figure 3. A short section of the eastern boundary hedgerow (Hedgerow H7a; refer to Figure 5) would need to be removed to accommodate a new road; refer to Figure 3. However, the remainder of the eastern boundary would be retained and

buffered from development by over 20m. Development would abut the central hedgerow (Hedgerow H5; refer to Figures 5), from which a short section would also be removed to facilitate access to the western field. However, this central hedgerow was not identified as a key commuting or foraging route for horseshoe or *Myotis* bats.

4.2.35 The Proposed Development would ensure that bat species from the SAC would be able to navigate and commute through the site. Minimum 10m wide 'dark corridors' (<0.5 lux) will be created along key commuting and foraging routes for bats, including the northern and southern site boundaries, with an additional 10m landscape buffer to include natural screening in the form of a new hedgerow before the development platform. No public-realm lighting is proposed (i.e. it is a 'dark development' with no street lighting proposed to the roads within the Proposed Development or to the junctions off Harepath Road).

Disturbance from new illumination causing bats to change their use of an area / habitat

4.2.36 In accordance with the assessment set out in Paragraphs 4.2.34-4.2.35, illumination from the Proposed Development would not result in changes in the patterns of use of the site by bats to the extent that an adverse effect on the integrity of the SAC would occur. The key navigating and commuting 'dark corridors' corridors along the northern and southern boundaries would be maintained; connectivity between the north and south corridors would also be maintained through the creation of a further dark corridor on the western boundary.

4.2.37 The extent of foraging habitat within the Proposed Development site would be increased and would not be affected by lighting. Lighting during construction could be controlled by the proposed mitigation measures, set out and secured through a CEcoMP. Accordingly, EDDC can conclude that there would be no adverse effect on the integrity of the Beer Quarry and Caves SAC as a result of this impact pathway.

Loss, damage, restriction or disturbance of a pinch point

4.2.38 In accordance with the assessment set out in Paragraphs 4.2.34-4.2.36, the Proposed Development would not lead to the loss, damage, restriction or disturbance of a Pinch Point for greater or lesser horseshoe bats. Both species would be able to move through the Proposed Development within the Pinch Point; refer to Appendix 4. EDDC can conclude that there would be no adverse effect on the integrity of the Beer Quarry and Caves SAC as a result of this impact pathway.

In-combination effects

4.2.39 The Proposed Development has the potential to act in-combination with other developments in the vicinity and wider area, impacting on bat populations associated with Beer Quarry and Caves SAC.

4.2.40 A search of planning applications on the East Devon District Council website was undertaken on 16 June 2025; the search area comprised an area from Branscombe in the west, to the Axe Estuary in the east, and in a northerly direction to Colyton. All relevant planning applications considered in the assessment are shown below (planning status correct at the time of investigation):

- 22/2781/MOUT Land Adjacent to Harepath Road Seaton (Approved subject to S106); Mixed-use development comprising of up to 130 dwellings to the east of Harepath Road and the laying out of a new community football pitch, parking and welfare facilities to the west of Harepath Road.

- 21/1782/MFUL Seaton Heights Harepath Hill Seaton (Awaiting decision). Erection of No. 9 x 2-bed and No. 14 x 3-bed and 19 x 4 bed two storey detached holiday homes with associated parking and amenity space.
- 22/1846/FUL Land Off Gosling Walk Harepath Road Seaton (Approved). Construction of 4 no. dwellings.
- 22/1522/MRES Land Adjacent Short Furlong Short Furlong Beer (Approved). Application for approval of reserved matters (Appearance, landscaping, layout and scale) following approval of outline application no 18/1957/MOUT18 - construction of up to 30 new dwellings (including affordable housing provision).

4.2.41 The Proposed Development would not have any residual adverse effects to carry forward to in-combination assessment. Commuting and navigating habitat would be maintained; foraging habitat would be increased, and there would not be an impact on the identified Pinch Point. Furthermore, in each case, it is reasonable to assume that the planning applications for the identified developments set out above have been or will also be subject to Habitats Regulations Assessment by EDDC; this is certainly the case for the approved development to the immediate east (planning reference 22/2781/MOUT Land Adjacent to Harepath Road Seaton).

4.2.42 For each development to be acceptable in isolation, it would be necessary to demonstrate that there would not be an adverse effect on the integrity of the greater and lesser horseshoe bat and Bechstein's bat populations associated with the Beer Quarry and Caves SAC, which would include the delivery of avoidance and mitigation measures as required. In summary, EDDC can conclude that there would be no adverse effect of the Proposed Development on the integrity of the SAC in-combination with other development coming forward, or likely to come forward.

5 Conclusion

5.1.1 There would be no Likely Significant Effect of the Proposed Development on the River Axe SAC; EDDC can screen out this European Site and all impact pathways from Appropriate Assessment. There is no realistic possibility of effects of the Proposed Development on the Sidmouth to West Bay SAC and Lyme Bay and Torbay SAC; EDDC can scope out the requirement for Stage 1 Screening of impact pathways for these European Sites.

5.1.2 Likely Significant Effects of the Proposed Development on the Beer Quarry and Caves SAC have been identified. EDDC should screen in this SAC and identified impact pathways for Appropriate Assessment. However, following consideration of the proposed avoidance and mitigation measures, EDDC can conclude that the Proposed Development would not have an adverse effect on the integrity of the SAC for any impact pathway, either in-isolation or in-combination. The proposed avoidance and mitigation measures, including monitoring and management protocols, would be set out in a CEcoMP, LEMP, and Detailed Lighting Assessment, which could be secured by planning conditions.

6 References

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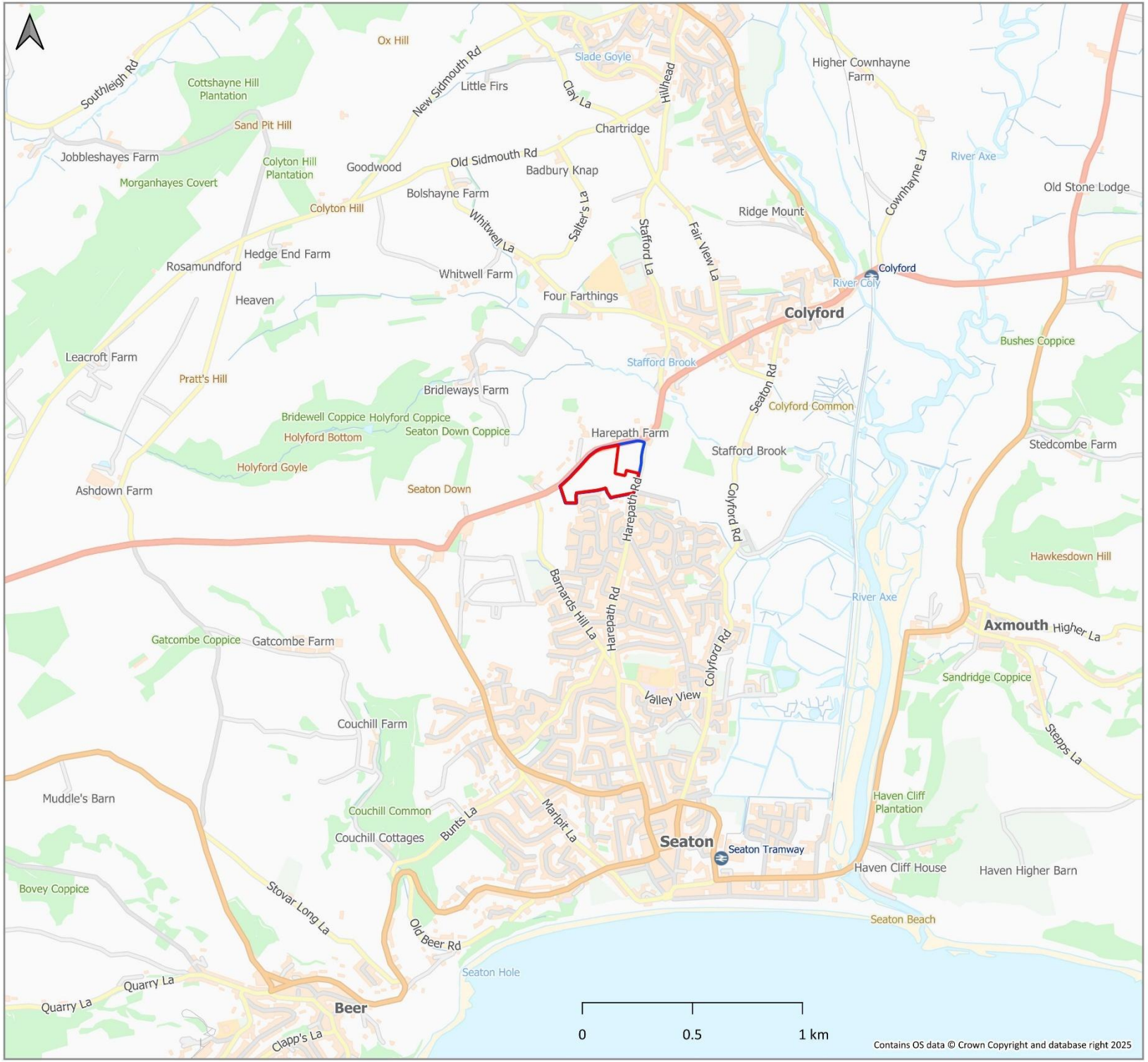
Figure 1: Site Location Plan



Key

- Site boundary
- Survey Area

ead ecology www.eadecology.co.uk	Baker Estates		
	Land South of Harepath Hill		
	Site Location Plan		
	11/08/2025	Created by: AB	Scale at A3 1:16,551

Figure 2: Concept Masterplan

- Site
- Phase 1 (eastern site) incl football pitch
- Residential area
- Key Streets
- Mews Street
- Pedestrian Route
- Trees
- Woodland & hedgerow
- Sustainable urban drainage basin
- Key space
- 10m dark corridor
- 10m additional landscape buffer

0 25m 50m

North

Rev	Comments	Date	Dr	Ch
P7	Including 20m bat mitigation area (added radii)	11-08-25	RE	RS
P6	Including 20m bat mitigation area	11-08-25	RE	RS
P5	Fifth Issue (Tree Amends)	20-06-25	RE	RS
P4	Fourth Issue (Road and Layout Amends)	18-06-25	RE	RS
P3	Third Issue	03-06-25	RE	RS
P2	Second Issue	20-05-25	RE	RS
P1	First Issue	16-05-25	RE	RS

Concept Master Plan Coloured
Land South of Harepath Hill
LSDW - BSL - XX - ZZ - DR - A - 1501 - P7
Land at Seaton, Devon 19006
Harepath Road, Seaton, Devon 1:1250 @ A3
Baker Estates PLANNING

Suite E, Ferry House
Canute Road
Southampton
Hampshire
SO14 3FJ

023 8063 1432

boyleandsummers.co.uk

Boyle & Summers

Figure 3: Indicative Landscape Strategy Plan

CORNUS Landscape Planning & Design

Legend

- Retained vegetation
- Broadleaved woodland
- Scattered native trees
- Street trees
- Native scrub
- Native hedgerow
- Species rich meadow
- Devon hedgebank
- Amenity grassland
- Wet meadow
- Indicative location of formal and informal play
- Indicative recreation routes

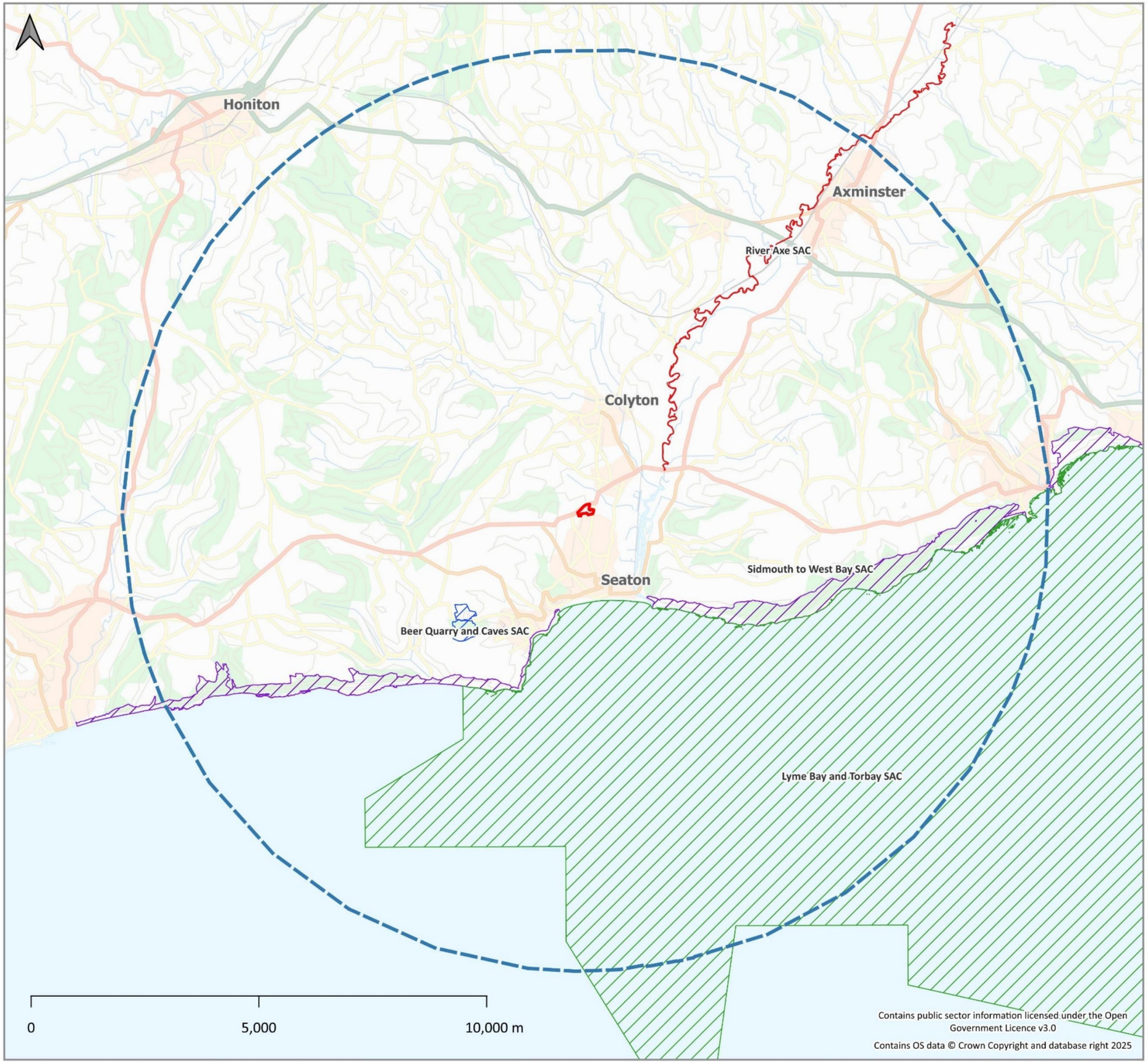
Drawing	Landscape Strategy
Drawing Number	CLPD 230 P08b
Date	11.08.2025

0m 10m 20m 30m 40m 50m

N

Land South of Harepath Hill, Seaton

Figure 4: European designated sites within 10km



Key

- Site boundary
- 10km buffer

European Designated Sites (located within 10km of the site)

- Beer Quarry and Caves SAC
- Lyme Bay and Torbay SAC
- River Axe SAC
- Sidmouth to West Bay SAC

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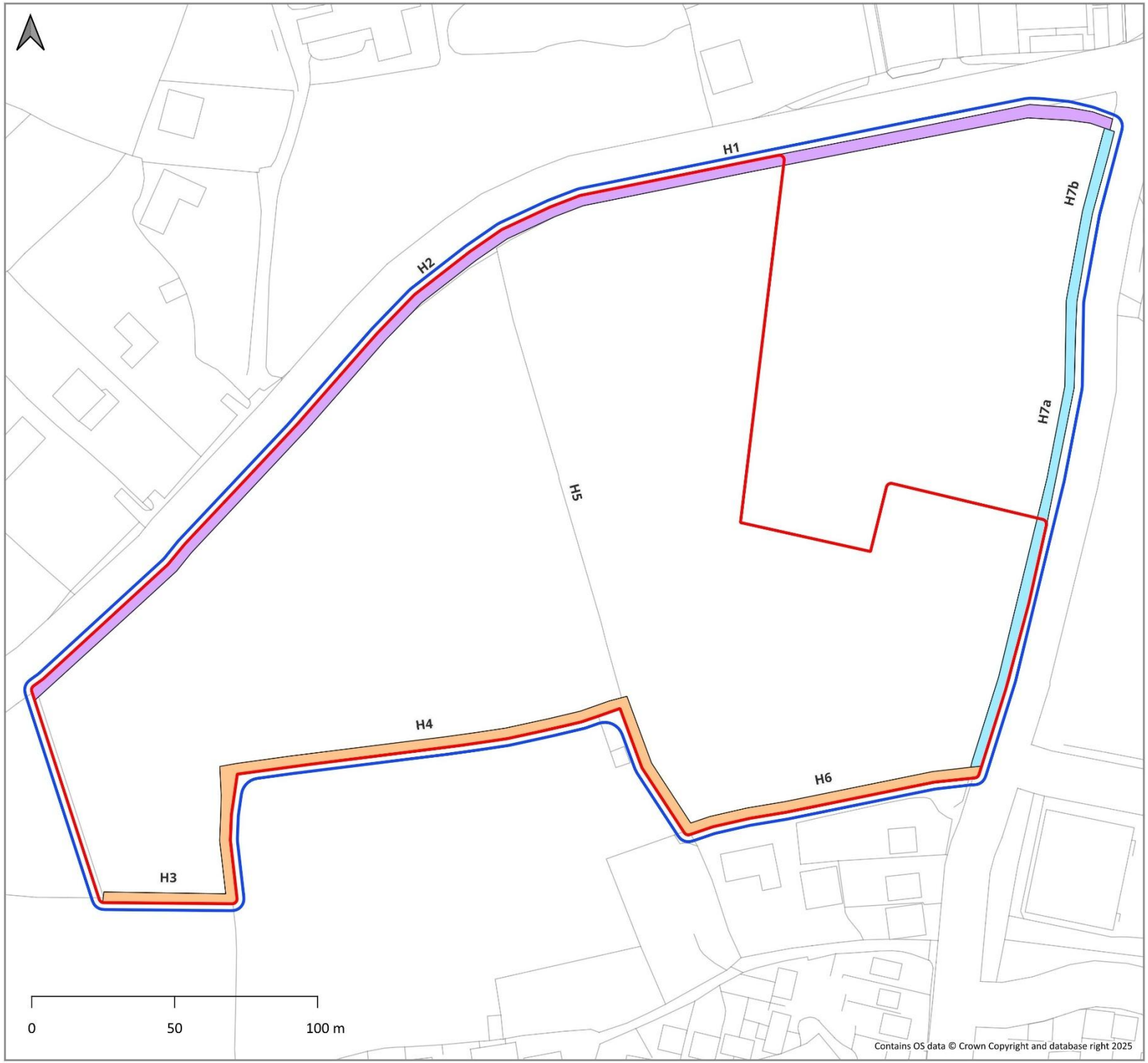
Land South of Harepath Hill

Special Areas of Conservation (SAC) Plan

11/08/2025	Created by: AB	Scale at A3 1:80,000

Project workspace - V:\984 Land at Seaton\GIS\2025\QGIS_Master_Template\QGIS Master Template.qgz

Figure 5: SAC Bat Constraints Plan



Key

- Likely Myotis & GHS commuting route
- Likely GHS & LHS commuting route
- Secondary Myotis commuting route
- Site boundary
- Survey Area

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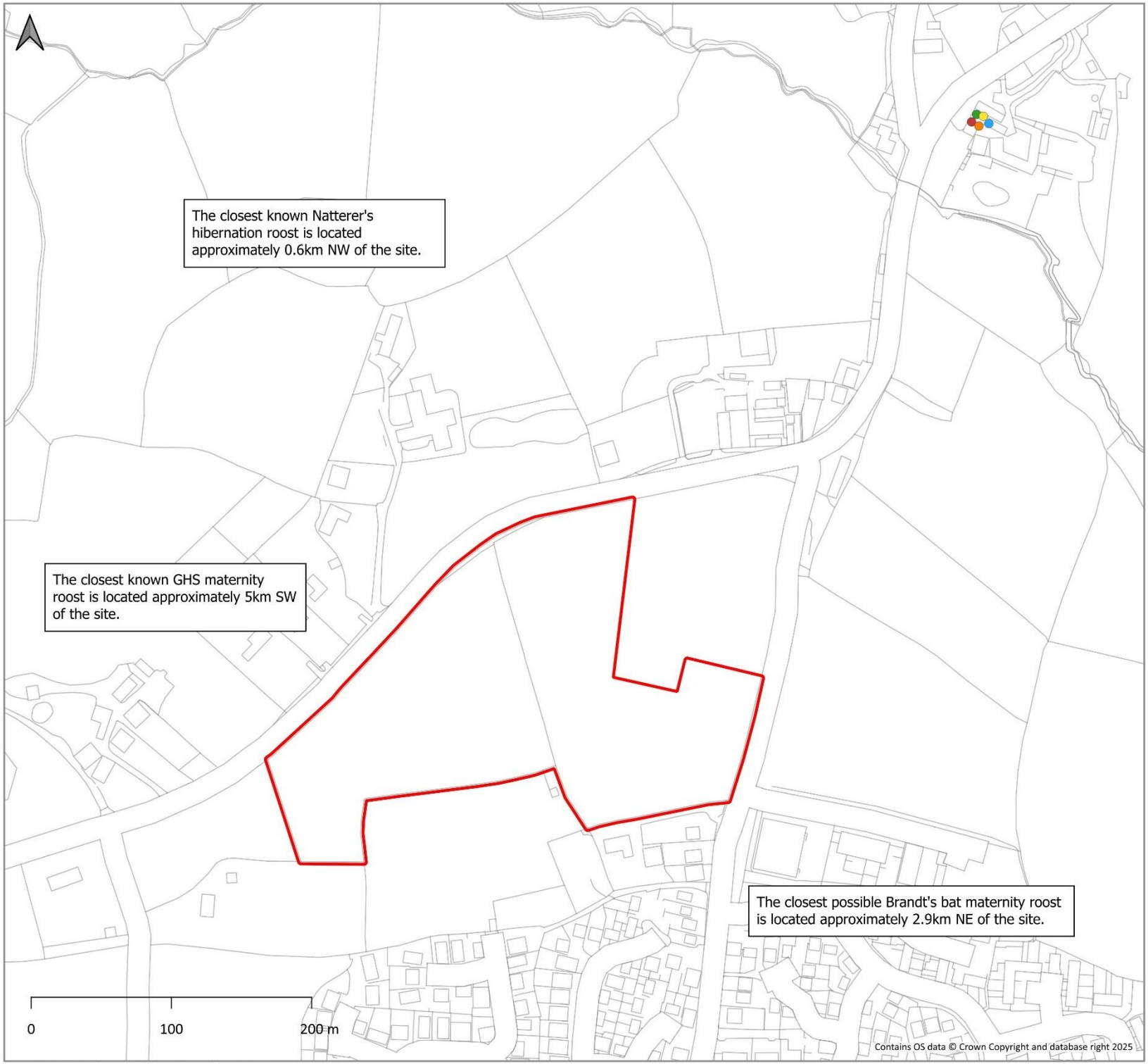
Land South of Harepath Hill

SAC Bat Constraints Plan

11/08/2025	Created by: AB	Scale at A3 1:1,275

Project workspace - V:\984 Land at Seaton\GIS\2025\QGIS_Master_Template\QGIS Master Template.qgz

Figure 6: Bat Roost Plan



Key

- Closest known GHS roost
- Closest known grey long-eared bat roost
- Closest known LHS hibernation roost
- Closest known LHS maternity roost
- Closest known Whiskered bat maternity roost
- Site boundary

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	Land South of Harepath Hill
	Bat Roost Plan
	11/08/2025 | Created by: AB | Scale at A3 1:2,600

Appendix 1: European Sites Conservation Objectives

European Site Conservation Objectives for Bee Quarry and Caves Special Area of Conservation
Site Code: UK0012585

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:

S1303. *Rhinolophus hipposideros*; Lesser horseshoe bat
S1304. *Rhinolophus ferrumequinum*; Greater horseshoe bat
S1323. *Myotis bechsteinii*; Bechstein`s bat

European Site Conservation Objectives for River Axe Special Area of Conservation Site code: UK0030248

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 qualifying natural habitats and habitats of qualifying species**
- **The structure and function (including typical species) of qualifying natural habitats**
- **The structure and function of the habitats of qualifying species**
- **The supporting processes on which qualifying natural habitats and 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:

H3260. Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitricho-Batrachion* vegetation; Rivers with floating vegetation often dominated by water-crowfoot

S1095. *Petromyzon marinus*; Sea lamprey

S1096. *Lampetra planeri*; Brook lamprey

S1163. *Cottus gobio*; Bullhead

European Site Conservation Objectives for Sidmouth to West Bay Special Area of Conservation
Site Code: UK0019864

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 qualifying natural habitats**
- **The structure and function (including typical species) of qualifying natural habitats, and**
- **The supporting processes on which qualifying natural habitats rely**

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:

H1210. Annual vegetation of drift lines

H1230. Vegetated sea cliffs of the Atlantic and Baltic coasts

H9180. *Tilio-Acerion* forests of slopes, screes and ravines; Mixed woodland on base-rich soils associated with rocky slopes*

* denotes a priority natural habitat or species (supporting explanatory text on following page)

European Site Conservation Objectives for Lyme Bay and Torbay Special Area of Conservation Site code: UK0030372

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 qualifying natural habitats**
- **The structure and function (including typical species) of qualifying natural habitats, and**
- **The supporting processes on which the qualifying natural habitats rely**

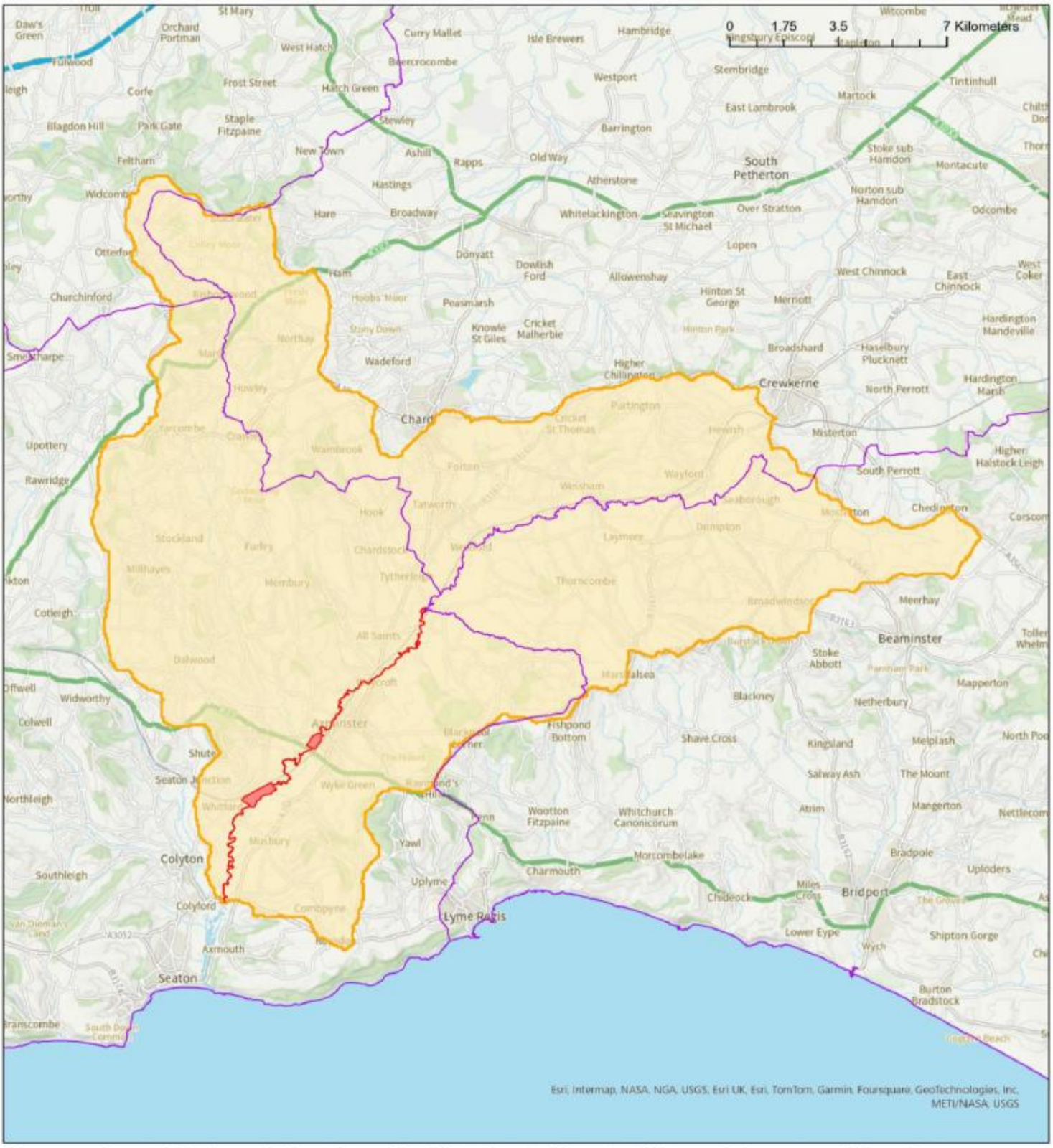
This document should be read in conjunction with the accompanying Conservation Advice document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.

Qualifying Features:

H1170. Reefs

H8330. Submerged or partially submerged sea caves

Appendix 2: River Axe SAC Catchment



Area where Natural England's Nutrient Neutrality advice applies for River Axe SAC

European protected sites requiring nutrient neutrality strategic solutions

- Local Authorities
- Component SSSIs of impacted designated site
- Surface water catchment area of relevant designated site due to nutrient pollution

Produced by Nutrient Mitigation Scheme Team

NATURAL ENGLAND

Appendix 3: Beer Quarry and Caves Bat Consultation Zones

Figure 2 – Greater Horseshoe Bat Consultation Zones

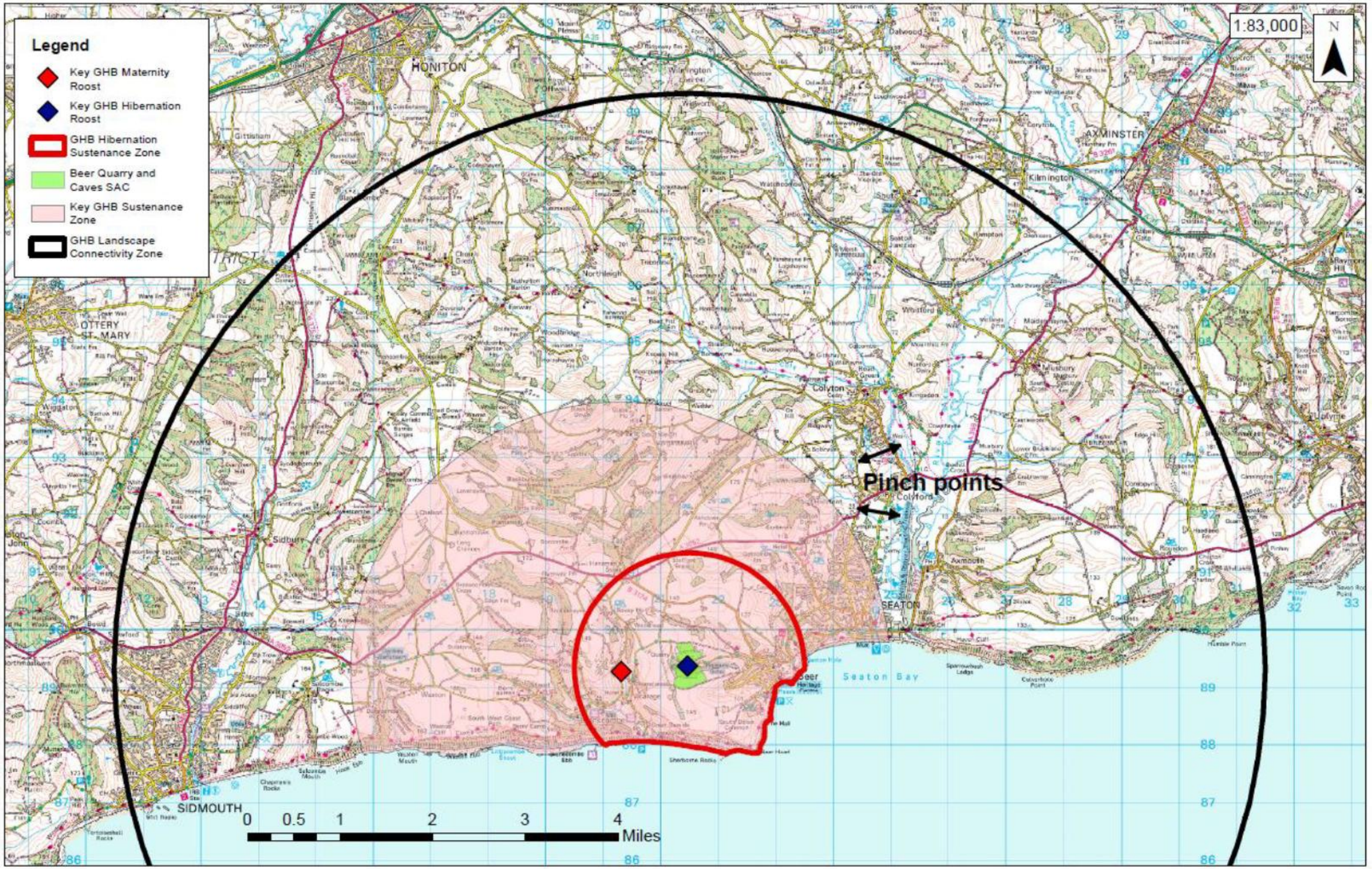


Figure 3 – Lesser Horseshoe Bat Consultation Zones

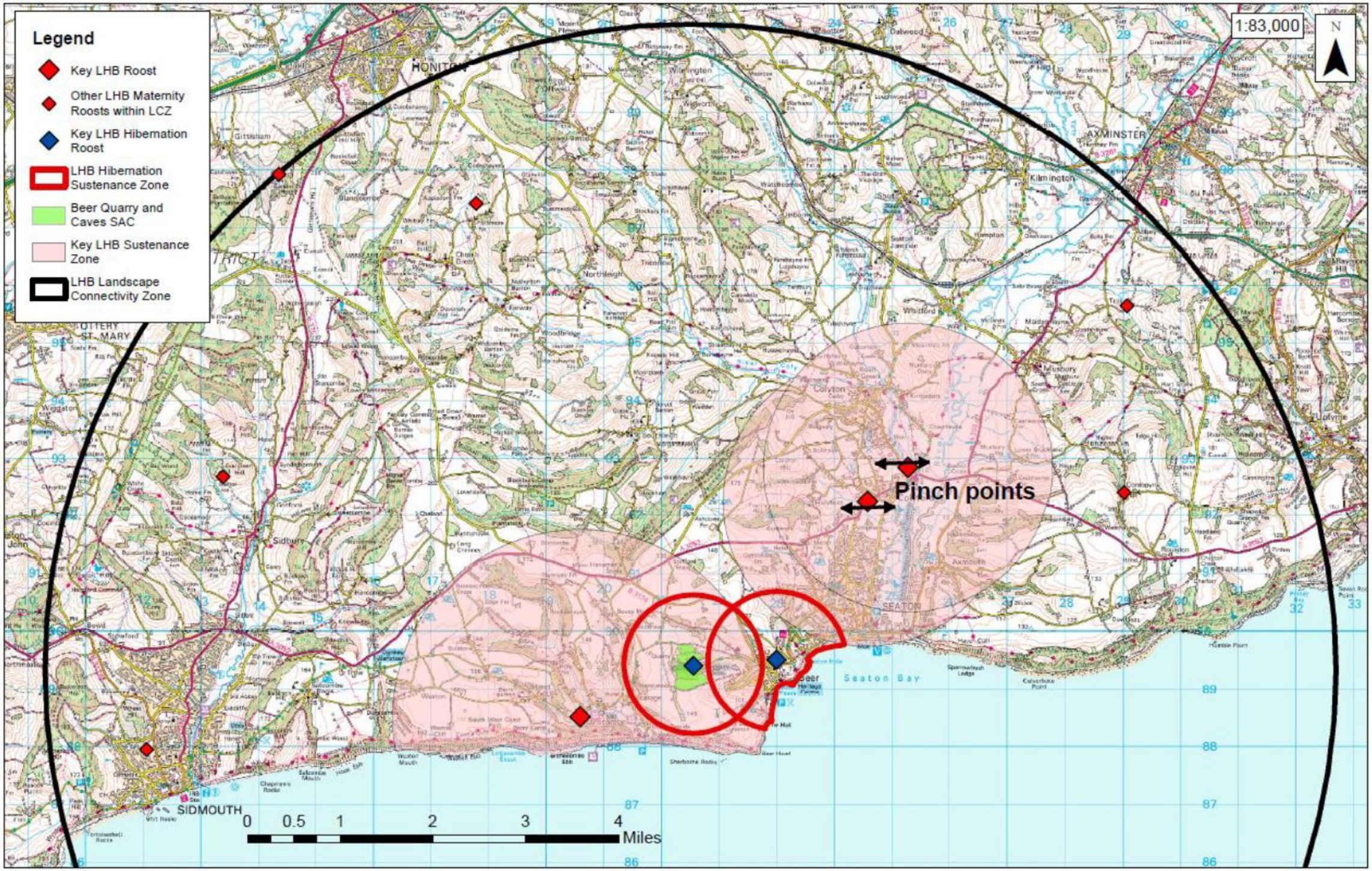
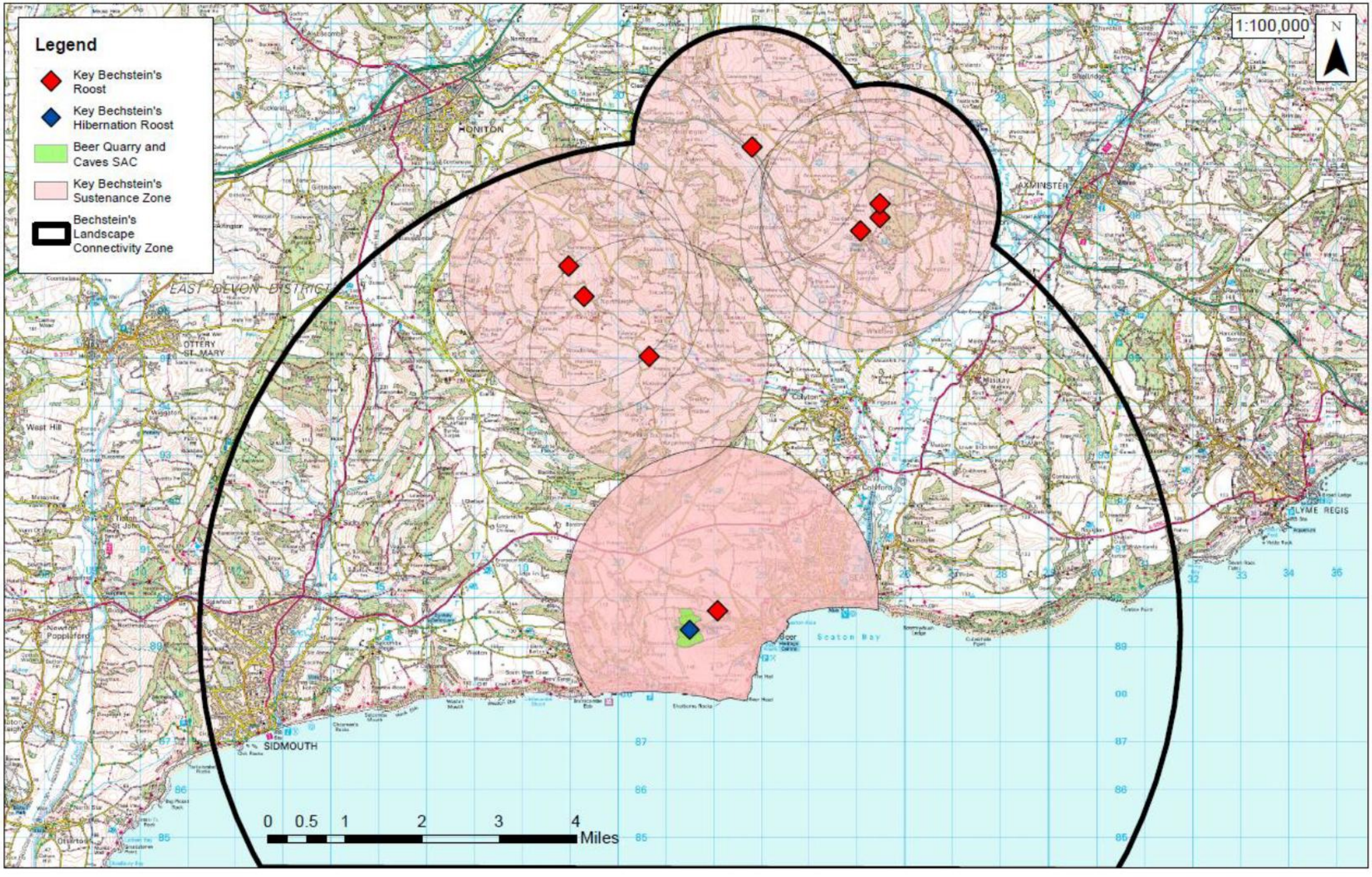


Figure 4 – Bechstein's Bat Consultation Zones



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