Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Elizabeth Burrows
Date:	26/06/2023
Application number:	PL/2023/00911
Proposal:	Construction of 6no. new affordable homes together with associated highways, landscaping and drainage infrastructure
Site address:	Land to the south of Knighton Road, Broad Chalke
Case officer:	Joe Richardson

Recommendations:

	No Comment
	Support
	No objection
	Condition (no objection subject to conditions)
X	Objection - further information required
	Objection in principle
X	HRA completed

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date)
1	Mitigation	CP50, Planning Policy 4A of the Broad Chalke Neighbourhood Plan 2019-2026	Assessment of impacts on hedge and mitigation strategy.	
2	Biodiversity Net Gain	NPPF, Policy 2B of the Broad Chalke Neighbourhood Plan 2019-2026	Amended BNG calculation addressing comments relating to neutral grassland and hedgerow provision. Evidence of 10% net biodiversity gain	

The outstanding document(s) listed above are needed to enable the council's ecology team to consider all the relevant impacts and benefits of the proposed scheme. The council's ecologists will provide a further response once <u>all</u> the above information has been submitted via the case officer.
Please Note: When resubmitting a revised document, ALL changes must be highlighted to enable review.

Matters considered:
The following reports and submissions have been reviewed:

- Preliminary Ecological Appraisal. (The Ecologists, May 2019).
- Ecology Assessment Broad Chalke V2. (Ethos Environmental Planning, May 2022).
- Proposed Site Layout. ST687-03g. (Etchingham Morris Architecture Ltd, March 2020).
- Detailed Planting Proposals. 2258 002 D. (Liz Lake Associates, 31/05/2023).
- Design and Access Statement. (Etchingham Morris Architecture Ltd)

The site is reported to measure approximately 0.22ha and is comprised of arable land, field margins and hedgerow at the northern boundary. A short section of hedge will be removed to facilitate the access however significant adverse impacts associated with this application are not predicted.

Planning Policy 4A of the Broad Calke Neighbourhood Plan states that this Site (Knighton Road Housing) is allocated for 6 affordable homes where plans conform with policies. The same policy states that developments must: '*retain and secure sustained protection and management of existing boundary hedgerows and trees as far as practicable*.' The northern hedgerow will be largely retained however it is unclear how the impacts on it will be mitigated.

Amendment of the proposals to include the planting a hedge along the southern boundary would be welcomed as it would mitigate for impacts on the northern hedge, extend an existing corridor from adjacent land to the east and its management for biodiversity would appear to be achievable.

The report recommends the provision of two swift bricks and one integrated bat box to be installed per dwelling. These measures are welcomed but have not been carried forward onto the drawings submitted with this application. All ecological mitigation and enhancement must be shown on a stand-alone plan and relevant architects plot/ elevation drawings to ensure consistency, deliverability and enforceability. **Ideally this plan/s would be provided in advance of determination but could alternatively be secured by condition requiring its submission to the council for approval prior to construction commencing.** This information will also need to be updated and detailed on the relevant plans, for example, architects' plot/ elevation drawings for integrated boxes are welcomed

Biodiversity Net Gain
Core Policy 50 requires all development to demonstrate no net loss of biodiversity and for major applications the expectation is that development will deliver a net gain.

Broad Chalke Neighbourhood Plan 2019-2026 has been formally made so now forms part of the Development Plan for Wiltshire and the policies in the neighbourhood plan will be given full weight when assessing planning applications that affect land covered by the neighbourhood plan. Planning Policy 2B Ecology requires that '*All development must make a provision for delivering at least a 10% net biodiversity gain as calculated using Natural England's Biodiversity Matrix*.'

In accordance with the Ecology Assessment the Detailed Landscape Proposals include neutral grassland and orchard in the southwestern corner, modified grassland, introduced shrub planting, 10 small urban trees and 12 medium trees.

Based on these habitats and features being provided the Ecology Assessment predicts a net gain in biodiversity of more than 10% for both habitat and linear features/ hedgerows however there are a number of apparent inaccuracies in the calculation that must be corrected or justified to confirm this is calculation is accurate.

The predicted gains require the creation of neutral grassland of 'good' condition. Achieving this habitat type and condition in this location is considered unlikely given the small area of grassland provided, over planting with fruit trees and recreational pressure. **Unless justification of otherwise is provided the metric must be amended to reflect the provision a more achievable grassland habitat**.

It is not clear if the loss of hedgerow at the northern boundary has been accounted for in the metric calculation. In addition, management of the retained northern hedge required by the BNG calculation would appear unrealistic given its location adjacent to the road, access and parking area. Specifically, the Detailed Landscape Plans do not demonstrate that there is adequate space for '*allowing bramble and other scrub species to grow at the base of the hedgerow*s' or for a hedge of >1.5m in height and width to be established. The establishment of a tall and wide hedge in this location may also trigger highway safety concerns. **Unless justification of otherwise is provided the metric must be amended to reflect the likely hedgerow habitat type and condition more accurately.**

The planting of a hedge at the eastern boundary is welcomed and it is agreed that due to its location within residential gardens it should be excluded from the BNG calculation. Contrary to this the Proposed Habitats drawing provided in Section 7.0 of the report indicates that this hedge is in fact included in the calculation. These needs clarifying.

In order to demonstrate compliance with Planning Policy 2B the metric calculation must be amended to address the concerns raised above and resubmitted in excel format. All drawings/ plans including, but not exclusively: layout; Detailed Planting Plan; and BNG Proposed Habitat plan must be amended to reflect any changes required.

Habitat Regulations Assessment
Planning Policy 4A of the Broad Calke Neighbourhood Plan states that this Site (Knighton Road Housing) is allocated for 6 affordable homes where plans conform with policies of the Broad Calke Neighbourhood Plan.

River Avon SAC
This development falls within the catchment of the River Avon SAC and has potential to cause adverse effects alone or in combination with other developments through discharge of phosphorus in wastewater. The Council has agreed through a Memorandum of Understanding with Natural England and others that measures will be put in place to ensure all developments permitted between March 2018 and March 2026 are phosphorus neutral in perpetuity. To this end it is currently implementing a phosphorous mitigation strategy to offset all planned residential development, both sewered and non-sewered, permitted during this period. The strategy also covers non-residential development with the following exceptions:

- Development which generates wastewater as part of its commercial processes other than those associated directly with employees (e.g. vehicle wash, agricultural buildings for livestock, fish farms, laundries etc)
- Development which provides overnight accommodation for people whose main address is outside the catchment (e.g. tourist, business or student accommodation, etc)

Following the cabinets resolution on 5th January 2021, which secured a funding mechanism and strategic approach to mitigation, the Council has favourably concluded a generic appropriate assessment under the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. This was endorsed by Natural England on 7 January 2021. As this application falls within the scope of the mitigation strategy and generic appropriate assessment, I conclude it will not lead to adverse impacts alone and in-combination with other plans and projects on the River Avon SAC.

The strategic mitigation is being delivered by the council on behalf of developers, providing that burdens are avoided and mitigated on site as far as practicable, such as the use of sustainable urban drainage systems (SuDS). For this application the above criteria have been met.

Add Condition A.4 in an approval is forthcoming.

New Forest Protected Sites

The development lies within the zone of influence for the New Forest protected sites which includes the New Forest SPA, New Forest SAC and New Forest Ramsar site. It is screened into appropriate assessment under the Habitats Regulations 2017 (as amended) on account of its potential to cause adverse effects through increased recreational pressure, which may occur alone and in-combination with other plans and projects. Many of the special features afforded protection are vulnerable to increased recreation as demonstrated in Natural England's supplementary advice issued for the SPA on 19 March 2019 and for the SAC on 18 March 2019. The Council has prepared an "Interim recreation mitigation strategy for the New Forest internationally protected sites" (Version 1, 25 March 2022) which identifies the zones of influence within which residential and tourism development have the potential to generate additional recreation pressure. The strategy details mitigation required to avoid and reduce impacts. Provision of Suitable Areas of Natural Greenspace (SANGs) will be provided to reduce visitor numbers at protected sites and where visits are unavoidable, strategic access management and monitoring (SAMM) methods will be used to control people's behaviour. The strategy explains that residential developments of 50 or more homes will be required to directly provide high quality open space while other development will contribute indirectly though allocation of funds from the Community Infrastructure Levy. Together this package of measures has been endorsed by Natural England on 24 March 2022 who consider the strategy to be sufficient to mitigate for development coming forward through the Wiltshire Core Strategy.

The Council therefore concludes that, provided the necessary mitigation is secured by condition or S106 as appropriate, the current application alone and in-combination with other plans and projects will not lead to adverse effects on the New Forest protected sites.

The necessary mitigation for this development is:

1. contributions through CIL towards SAMM.

CONDITIONS:

Final sign off – all matters addressed:

Ecologist	Date