Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Elizabeth Burrows, Senior Ecologist
Date:	03/04/2023
Application number:	PL/2023/11127
Proposal:	Conversion of ancillary domestic building into holiday let and the erection of bat roost building
Site address:	Land and Building at Meadow Farm, East Chisenbury, Pewsey, SN9 6AQ
Case officer:	Lucy Minting

Recommendations:

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

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date)
1	Roosting Bats	CP50	Confirmation of bat roost status. Bat roost classification surveys. Bat mitigation strategy based on roost classification.	
2	River Avon SAC	CP50, NPPF, Habitat Regulations	Nutrient calculation in Excel format. Map showing location of existing ST and proposed PTP.	

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:

- Ecological Impact Assessment for Bats, Nesting Birds, White-clawed Crayfish and The River Avon SAC. Barn at Meadow Farm, East Chisenbury. (Abbas Ecology, October 2023).
- Nutrient Neutrality Assessment and Mitigation Strategy (NNAMS). Meadow Farm, East Chisenbury. Document Ref: 364157-NNAMS (Enviren, 23 July 2022).
- Proposed Conversion of Barn Site Plans. (O2i design consultants 18/11/2022).

Bats
The building inspection, eDNA surveys and automated bat surveys confirm common pipistrelle bats, brown long-eared *bat* and Natterer's bats use the barn. The barn is reported to provide a number of potential roosting features including: over lapping wooden planked walls, clay tiled roof and lead flashing, crevices in wooden frame work and mortise holes. The latter features are typical common pipistrelle bat, brown long-eared bat and Natterer's bat roosting features because they provide dark sheltered crevices even in naturally lit spaces. The report does not state that these features were inspected using ladders, torches or endoscope to confirm the absence of roosting bats as would normally be expected.

Contrary to the statement in the report the automated detectors recorded bats within the barn well within recognised emergence and re-entry times for these species, which are often late emergers, increasing the likelihood that bats are using the barn as a day roost. The quiet echolocation of brown long-eared bats means they can easily be missed by detectors increasing the likelihood that their presence in the barn could have been missed.

Given the high number of bat roosting features that are present and evidence confirming bats using the barn the number of bat surveys carried out is not adequate. Further to this the location of possible bat access or egress points have not been provided therefor it is not possible to determine if they were visible to the surveyors during the emergence/ re-entry surveys. Positioning of a surveyor inside of the barn will have enabled bat activity to be observed.

The surveys and eDNA analysis confirm bats are present in the barn however contrary to the submitted report the methodology is not adequate to confirm the status of the bat roosts (presence/ absence of day roosts or numbers of bats). The development will result in the loss of roosting function within the barn. **Further survey is required to confidently determine the status of bat roosts within the barn.** As the status of the bat roost hasn't been confirmed it is not possible to determine if the replacement roost would provide adequate mitigation. Further to this it is unclear why the mitigation is based on a lesser horseshoe bat night roost rather than the species concerned.

The development will result in the loss of roosting function within the Building at Meadow Farm. Bats and their roosts are afforded stringent protection under the Conservation of Habitats and Species Regulations 2019 (as amended) and as such are a material consideration within the planning consultation process. Sufficient and appropriate mitigation measures to ensure that bats are not adversely affected as a result of the proposed development must be submitted as part of the proposal, and shown on development drawings, where bats are present, or likely to be present.

In carrying out its statutory function, the LPA must be reasonably sure that the proposal will not result in significant adverse effects on protected habitats or species. The information outlined above must therefore be submitted and reviewed by the LPAs ecology team prior to determination of the application.

Habitat Regulations Assessment

River Avon Special Area of Conservation (SAC): Hampshire catchment.
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. Appropriate Assessment (must be carried out by the relevant Competent Authority (the LPA) to determine the potential significant effects and the suitability of any measures proposed to avoid or mitigate those effects.

The submitted Nutrient Neutrality Assessment and Mitigation Strategy Report is welcomed. The replacement of an existing Septic Tank (ST) serving Meadow Farm with a suitable, high functioning Package Treatment Plant (PTP) GRAF One2Clean which shall utilise the existing connection into the stream fed by the River Avon to the east is recommended as mitigation for increased nutrient burdens. **In order to confirm this mitigation is acceptable the following information is required:**

- **A drawing showing the location of the existing ST and proposed replacement PTP.**
- **The nutrient calculation submitted in excel format.**

Once the mitigation has been confirmed as acceptable the AA must be sent to Natural England. The application must not be approved until NE have endorsed the AA.

Salisbury Plain Special Protected Area (SPA)
This application lies within the 6.4km buffer zone of the Salisbury Plain SPA and in light of the HRA for the Wiltshire Core Strategy and the HRA for the Wiltshire Housing Site Allocations Plan it is screened into Appropriate Assessment due to the potential impact of recreational pressure on stone curlew in combination with other plans and projects. In April 2023 Natural England (NE) confirmed that the 2018 Appropriate Assessment for Salisbury Plain continues to be supported by NE.

That Appropriate Assessment reached a conclusion of no adverse effects on site integrity for development within 6.4km of the SPA boundary provided that the mitigation scheme continues to be implemented. Annual stone curlew monitoring and protection measures continue to be secured by the Council.

Final sign off – all matters addressed:

Ecologist	Date