Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jenna Buss
Date:	21/05/2024
Application number:	PL/2023/02992
Proposal:	Erection of 14 Holiday let lodges and associated works
Site address:	Land South of Headlands Farm, Cricklade, Wiltshire, SN6 6HZ
Case officer:	Callan Powers

Recommendations:

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

An Appropriate Assessment for impacts on North Meadows and Clattinger Farm SAC has been completed with a favourable conclusion. This AA has been sent to NE for their consideration. The application must not be approved until NE have endorsed the AA.

Further Information Required:

	Issue	**Policy/Legislative Compliance**	**Date information requested & Further information required**	**Satisfactorily addressed (Document & Date)**
1	EcIA	CP50 NPPF Habs Regs	Ecological Assessment	
3	No Net Loss Biodiversity	CP50 NPPF	Evidence of no net loss of biodiversity	

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.

Thank you for consulting Ecology, I have reviewed the application and supporting documents against OS Maps and aerial photography of the site and surrounding area, together with GIS layers of statutory and non-statutory sites and existing records of protected species.

The following submitted documentation was reviewed to inform this response:

- Location Plan Site Layout Plan. February 2023. DJC
- Environmental Audit Assessment. Terra Datum

Protected Species
No ecological surveys have been submitted in support of this application. There is therefore insufficient information to be able to determine if the proposlas will impact upon notable habitats and/or species.

From aerial photographs it appears there is an existing pond within the site as well as ponds adjacent to the site that may support amphibians. It is noted that the proposed access track will occur along an existing hedge line and woodland edge. It is noted that passing places will be created thus removing habitat currently present. The Environmental Audit Assessment submitted in support of the application does not follow current best practice guidelines. A Preliminary Ecological Appraisal is required and should follow current best practice guidelines Guidelines-for-Preliminary-Ecological-Appraisal-Jan2018-1.pdf (cieem.net).

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. Additional information is therefore required to assess the baseline ecological value of the site and any impacts the proposals may have on the ecology present. This information is required prior to determination of the application.

North Meadow and Clattinger Farm Special Area of Conservation (SAC)
The development lies within the inner zone of influence (0-4.2km) for the North Meadow National Nature Reserve (NNR)/Site of Special Scientific Interest (SSSI) component of North Meadow and Clattinger Farm SAC, notified as an exceptional example of lowland meadow with a very high proportion of the surviving UK population of snake's head fritillary. The development is screened into Appropriate Assessment under the Habitat Regulations 2017 (as amended) on account of its potential to cause adverse effects through increased recreational pressure, which may occur alone or in-combination with other plans and projects.

Wiltshire Council, Cotswold District Council and Swindon Borough Council in partnership with Natural England have produced an Interim (2023-2028) Recreation Mitigation Strategy for proposed development within this zone.

The standard mitigation agreed under the above strategy for all residential development of under 50 units in the Inner Zone is:

- Strategic Access Management and Monitoring (SAMM) contribution per unit £323
- Infrastructure Mitigation Projects/Suitable Alternative Natural Greenspace (SANG) contribution per unit £480

Total financial contribution to delivery of the Interim Mitigation Strategy - £803 per unit. With a total scheme cost of £11242

This financial contribution will be secured using a S111 Agreement, Unilateral Undertaking or a S106 Agreement at the time of permission with contributions secured prior to commencement. Securing contributions in this way enables the Council as the local planning authority to comply with the requirements of Regulation 63 of the Conservation of Habitats and Species Regulations 2017 ("the Habitats Regulations") (as amended) and Core Policy 50 (Biodiversity and Geodiversity) of the Wiltshire Core Strategy ("WCS"). It is considered that this approach delivers the required level of certainty to secure effective mitigation for the recreational burdens of this planning application.

Natural England have confirmed with Wiltshire Council that they approve the North Meadows and Clattinger Farm SAC Appropriate Assessments that use the agreed mitigation scheme, providing that all mitigation measures are appropriately secured via legal agreement within any permissions granted.

BNG
This application was submitted prior to Biodiversity Net Gain (BNG) becoming mandatory. Core Policy 50 of the Wiltshire Core Strategy requires all development to demonstrate no net loss of biodiversity and for major applications the expectation is that development will deliver biodiversity gains. The NPPF also encourages applications to deliver measurable net gains (para 180 d).

Evidence to demonstrate an enhancement has not been submitted. A statutory metric is now available to calculate the predicted change in biodiversity value of a Site and provide an opportunity to demonstrate that the development will result in biodiversity net gain.

Final sign off – all matters addressed:

Ecologist Jenna Buss	Date