The Ecology Partnership
Thorncroft Manor, Thorncroft Drive
Leatherhead, Surrey KT22 8JB

T +44 (0) 1372 364133
E info@ecologypartnership.com
W ecologypartnership.com

Address: **Land at Carvers Hill Farm, Shalbourne**
App No: **PL/2023/10755**
Date: **21st March 2024**
Prepared By: **Digby Hayden**
Subject: **Ecological Response**

This technical note responds to the comments received from Rachel Whyte (Ecology Officer) for the proposed development at Carvers Hill Farm, Shalbourne (detailed below). Wiltshire council state:

"Recommendations were made in the Preliminary Ecological Appraisal to provide compensatory roosting and nesting opportunities for barn owl, as well as bird boxes and refugia for amphibians/reptiles/invertebrates etc. Details of these measures have not been shown on site plans, despite bat boxes being shown. Plans should be updated to show the recommended mitigation and enhancement measures. Alternatively, given that elements of the previous application are already in progress it would be acceptable to submit evidence that these features have been installed.

The provision of a barn owl box, bird boxes and log piles have been agreed with the client and the locations of these are shown in figure 1 below. Specific details including models of barn owl box and bird boxes and the construction of log piles are to be included within an ecological mitigation and enhancement strategy. Woodcrete boxes for bird boxes will be utilised as these are long lasting and require limited maintenance. With regards to the barn owl box, this would follow designs as detailed by the Barn Owl Trust. Log piles will be created using various shapes and sizes of logs, with some sections dug into the ground, with others stacked, creating a variety of niches that can be exploited by invertebrates, small mammals and herptiles.



Figure 1: Barn owl box, bird box and logpile locations.

Wiltshire council go on to state:

Natural England Priority Habitat Inventory identifies habitat to the south/southwest of the site as priority habitat lowland calcareous grassland. The Preliminary Ecological Appraisal also identifies this area as lowland calcareous grassland and acknowledges it is a priority habitat. The 2023 Preliminary Ecological Appraisal – Addendum identifies grassland to the south/southwest of the site as modified grassland, a significant downgrade from what was previously understood to be present. It is noted that the report states that modified grassland to the south of the site is 'newly created'.

Loss and harm to priority habitat is contrary to NPPF Paragraph 185b which requires plans to promote the conservation, restoration and enhancement of priority habitats. In order to be compliant with Core Policy 50 a Lowland Calcareous Grassland Mitigation Strategy must be submitted, the document shall set out the approach to mitigate and compensate harm to this priority habitat. The strategy will also include the parcel of calcareous grassland identified in the north of the site as the plans indicate this habitat is to be lost.

Wiltshire council go on to state:

Core Policy 50 of the Wiltshire Core Strategy requires all development to demonstrate no net loss of biodiversity and encourages developments to seek opportunities to enhance biodiversity. The NPPF also encourages applications to deliver measurable net gains (para 174 d). The biodiversity metric and associated report must be updated to address the following points:

- *The precautionary principle must be applied to areas identified on the Natural England Priority Habitat Inventory as lowland calcareous grassland. Unless sufficient evidence can be submitted to demonstrate otherwise, this habitat must be entered into the metric as lowland calcareous grassland in good condition.*
- *The biodiversity metric and post-development habitat maps must align with the final landscape proposals.*
- *Proposed compensation measures are welcomed however further steps could be taken to maximise benefits to biodiversity e.g., a higher quality grassland in the offsite compensation area, a species-rich native hedgerow instead of a single species hedgerow.*

No evidence of the previous value of the grassland is available as the areas identified as calcareous grassland were not within the red line boundary of the PEA survey conducted in 2020. These areas were identified on Magic as being calcareous grassland, albeit no ground based assessments were conducted at the time. However, it must be noted that aerial imagery shows this habitat being under arable rotation since 2017 (approximately) and therefore any changes to the grassland habitat occurred prior to 2020.

Regardless of this, the client has agreed to the provision and re creation of 3 ha of lowland calcareous grassland within the neighbouring field to the southwest of the application boundary (pink boundary in figure 2 below). This area is identified as lowland calcareous grassland on Magic, whereas this area is currently an arable field. As shown in the updated biodiversity metric and report, this provides sufficient compensation for the loss of all lowland calcareous grassland priority habitat within the red line / application boundary, within an area historically identified as supporting the habitat. The creation and management details of the grassland will be detailed within an ecological mitigation and enhancement strategy. This area will be managed under a 30 year LEMP.



Figure 2: 3 ha agreed for lowland calcareous grassland creation

The clearance of habitats around the pond has resulted in the loss of functional aquatic habitat on the site. This should be rectified through marginal and bankside planting of the pond or provision of a separate wildlife pond. The updated biodiversity net gain report and unlocked biodiversity metric spreadsheet is required.

The pond located to the south east of the site was dry at the time of the 2020 PEA. No marginal vegetation was recorded in this location, with an area of scrub present around the dry pond. Whilst this area of scrub has been removed this scrub loss has been compensated within the scheme. A new pond has been created within the new layout. However, additional planting, to ensure that the pond achieves moderate condition, has been recommended.

The provision of further marginal and bankside planting of the existing pond will take place, to be detailed within an ecological mitigation and enhancement plan unless otherwise agreed with the LPA.

A site-wide Ecological Mitigation Strategy (EMS), detailing the creation of the above mitigation can be secured via planning condition. This will follow shortly after this response and detail mitigation measures

and management strategies of barn owl boxes, bird boxes, log piles, calcareous grassland and pond enhancement.