Wiltshire Council

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Max Hemmings
Date:	04/06/2024
Application number:	PL/2023/11159
Proposal:	Construction of 4no dwellings and associated works
Site address:	Land to the West of Travis Perkins Trading Company, Lanes End, Gastard, Corsham, SN13 9QS
Case officer:	Peter Crozier

Recommendations:

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

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date)
1	Avoidance of Impacts to Biodiversity	CP50, NPPF, Policy CNP E1 from the Corsham Neighbourhood Plan	**04/06/2024** Plans which avoid impacting the habitats of importance (woodland, trees and scrub) for biodiversity.	**NO**
2	Detailed Biodiversity Strategy	CP50, NPPF	**04/06/2024** The inclusion of the biodiversity mitigation and enhancement features on the relevant drawings.	**NO**

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.

The ecology report (*Preliminary Ecological Assessment (PEA), Version: CICv1.0, Date: 14/12/23 by Ellendale Environmental Limited*) submitted to this application is welcomed.

The ecology report confirms the woodland and scrub on site provides suitable habitat for nesting birds along with foraging/commuting habitat for birds, bats and hedgehog.

Our objection aligns with the Landscape officer's (C-1404837) and Arboricultural Officer's (C-1404835) comments and the previous Ecology objection to the parent application (PL/2023/01088).

1. Avoidance of Impacts to Biodiversity

The site is 155m east of a 4km core foraging zone for greater horseshoe bats as part of the consultation zone for Bath and Bradford on Avon Bats Special Area of Conservation (SAC). These bats are known to readily forage and commute over 30km from their roosts and so it is considered likely bats associated with the SAC could be foraging and commuting within the proposed site. In addition, the site is located 50m north-west of an entrance to Elm Park Quarry which hosts at least six species of bat including two species of Annex II bats (greater horseshoe and lesser horseshoe). This quarry is an identified roost as part of the Corsham Batscape Strategy.

Since no bat activity survey information was submitted to this application it is assumed the proposed site is used by internationally important species of bat. The majority of the habitat on site is hardstanding with storage containers. However, the woodland, trees and scrub that surround the site are considered to have significance for bats. Therefore, the retention and enhancement of the woodland, trees and scrub is a key consideration to ensure the area remains functional for bats and other protected species.

The trees on the western edge of the site are also protected under Tree Preservations Orders (TPO) references: N/TPOLEGAST and N/TPO248. It is not possible to enforce the protection of habitat such as the trees and scrub within private residential curtilage. The habitats to be retained and created for the benefit of biodiversity will need to be in areas of communal ownership.

To remove this objection, an updated Proposed Site Plan is required which shows the habitats of importance (woodland, trees and scrub) for biodiversity to be retained and within communal ownership.

2. Detailed Biodiversity Strategy

A strategy is required which details the location and specification of the biodiversity mitigation and enhancement measures such as but not limited to the bat and bird boxes, hedgehog highways in property fences and reptile hibernacula. The integrated mitigation/enhancement features on new developments should be created at the ratio of 1:1 feature to building in accordance with best practice guidelines. Integrated features must seek to benefit a target species and demonstrate viability in terms of position on building, location and clustering in accordance with relevant guidance. The integrated feature specifications and positioning should seek to increase the likelihood of uptake by their target species. This could result in some properties hosting clusters of integrated features (such as swift bricks) compared to other proposed properties in less favourable areas for biodiversity.

To remove this objection, the location and specification of the integrated features must be included in the building proposed elevation drawings. The location and specification of the non-integrated features must be included in the proposed landscape/site plans.

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 LPA's ecology team prior to determination of the application.

DRAFT CONDITIONS: to be finalised when all information detailed above has been submitted and approved.

1. **Landscape and Ecological Management Plan (LEMP)**

Prior to the start of construction, a Landscape and Ecology Management Plan (LEMP) suitable to the scale of the development shall be submitted to and approved in writing by the Local Planning Authority. The LEMP will include long term objectives and targets, management responsibilities and maintenance schedules for each ecological feature within the development, together with a mechanism for monitoring success of the management prescriptions, incorporating review and necessary adaptive management in order to attain targets.

The LEMP shall also include details of the legal and funding mechanism(s) by which long-term implementation of the plan will be secured. The LEMP shall be implemented in full and for the lifetime of the development in accordance with the approved details.

REASON:
To ensure the long-term management of landscape and ecological features retained and created by the development, for the benefit of visual amenity and biodiversity for the lifetime of the scheme.

2. **Lighting**

No new external artificial lighting shall be installed at the site unless otherwise agreed in writing by the local planning authority.

The plans will be in accordance with the appropriate Environmental Zone standards set out by the Institution of Lighting Professionals (ILP) Guidance Notes on the Avoidance of Obtrusive Light (GN 01/2021) and Guidance note GN08/23 “Bats and artificial lighting at night”, issued by the Bat Conservation Trust and Institution of Lighting Professionals.

REASON:
In the interests of conserving biodiversity.

3. **Construction Environment Management Plan (CEMP)**

Prior to the commencement of works, including demolition, ground works/excavation, site clearance, vegetation clearance and boundary treatment works, a Construction Environmental Management Plan (CEMP) shall be submitted to the local planning authority for approval in writing. The Plan shall provide details of the avoidance, mitigation and protective measures to be implemented before and during the construction phase, including but not necessarily limited to, the following:

a) Identification of ecological protection areas/buffer zones and tree root protection areas and details of physical means of protection, e.g. exclusion fencing.
b) Working method statements for protected/priority species, such as nesting birds and reptiles.
c) Work schedules for activities with specific timing requirements in order to avoid/reduce potential harm to ecological receptors; including details of when a licensed ecologist and/or ecological clerk of works (ECoW) shall be present on site.
d) Key personnel, responsibilities and contact details (including Site Manager and ecologist/ECoW).

Development shall be carried out in strict accordance with the approved CEMP.

REASON: To ensure adequate protection and mitigation for ecological receptors prior to and during construction, and that works are undertaken in line with current best practice and industry standards and are supervised by a suitably licensed and competent professional ecological consultant where applicable.

4. Compliance with submitted documents

The development will be carried out in strict accordance with the following documents:

- Site plan **TBC**
- Building elevation plans **TBC**

The installation of the biodiversity mitigation and enhancement measures will be supervised by a professional ecologist and will continue to be available for wildlife for the lifetime of the development.

REASON: For the avoidance of doubt and for the protection, mitigation and enhancement of biodiversity.

Final sign off – all matters addressed:

Ecologist	Date