

## Wiltshire Council Planning Consultation Response

### ECOLOGY

|                            |                                                                                                                                                                                               |
|----------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Officer name:</b>       | Jessica Cracknell (Ecologist)                                                                                                                                                                 |
| <b>Date:</b>               | 08/10/2025                                                                                                                                                                                    |
| <b>Application Number:</b> | PL/2025/06872                                                                                                                                                                                 |
| <b>Proposal:</b>           | Demolition of the existing dwelling and garage and replacement with a new dwelling (self-build) with other associated works including landscape treatment, infrastructure and vehicle parking |
| <b>Site Address:</b>       | The Old Vicarage, Homington Road, Coombe Bissett, Salisbury, SP5 4LR                                                                                                                          |
| <b>Case Officer:</b>       | Joe Richardson                                                                                                                                                                                |

### Recommendations:

|                                     |                                                |
|-------------------------------------|------------------------------------------------|
| <input type="checkbox"/>            | No Comment                                     |
| <input type="checkbox"/>            | Support                                        |
| <input type="checkbox"/>            | No objection                                   |
| <input type="checkbox"/>            | Condition (no objection subject to conditions) |
| <input checked="" type="checkbox"/> | Objection - further information required       |
| <input type="checkbox"/>            | Objection in principle                         |
| <input type="checkbox"/>            | HRA.                                           |

### Further Information Required:

|   | Issue             | Policy/Legislative Compliance | Date information requested & Further information required                                                                                                                       | Satisfactorily addressed (Document & Date submitted) |
|---|-------------------|-------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| 1 | Protected Species | NPPF, CP50, Habs Regs         | <b>08/10/2025</b><br>The bat emergence surveys and reptile surveys were undertaken in August 2022 and are considered to be out of date. Up-to-date survey results are required. | 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 all 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 your consultation on the above application. I have reviewed the submitted documents against OS maps, aerial photographs of the site and surrounding area, together with GIS layers of statutory and non-statutory designated sites and existing records of protected species.

The following submitted documentation was reviewed to inform this response:

- Bundle 4: Full Ecological Mitigation. 31 July 2025;
- Site Ecological Conditions Update Letter. 21 July 2025. Kingfisher Ecology Ltd. Doc Ref. TOV-20240523-Rev B;
- Site Ecological Conditions Update Letter. 22 October 2024. Kingfisher Ecology Ltd. Doc Ref. TOV-20240523-Rev A;
- Bat Emergence and Return to Roost Surveys Report. 22 October 2024. Kingfisher Ecology Ltd. Doc Ref. TOV-17082022-Bat Rev B;

- Phase 2 Reptile Survey Report. 21 October 2024. Kingfisher Ecology Ltd. Doc Ref. TOV-19082022-Rep Rev B;
- Proposed Environmental Protection Plan. 07 August 2025. Whiterok Architecture. Project No. 672. Drawing No. P20. Rev. F;
- C.E.M.P. Preliminary Construction and Environmental Management Plan. 11 August 2025. Benchmark Planning Ltd;
- Arboricultural Survey Impact Assessment & Arboricultural Method Statement. 11 August 2025. RMT Tree Consultancy Ltd. Ref. RMT1055REVA;
- Tree Constraints Plan. August 2025. RMT Tree Consultancy Ltd. Drawing Ref. Appendix 3 – RMT1055 – TCP – Rev A;
- Tree Protection Plan. August 2025. RMT Tree Consultancy Ltd. Drawing Ref. Appendix 4 – RMT1055 – TPP – Rev A;
- BEN 0001: Foul Drainage Proposed Protection Plan. 14 July 2025. Whiterok Ltd;
- Block Plan. 22 September 2024. Whiterok Architecture. Project No. 672. Drawing No. P02. Rev. C;
- The Planning Balance. 14 August 2025. Benchmark Development Planning Ltd.

### **New Forest Protected Sites**

The proposed development site lies within the 13.8km zone of influence for the New Forest internationally protected sites, which comprises the New Forest SPA, New Forest SAC and New Forest Ramsar site. Therefore, the application is screened into appropriate assessment under the Conservation of Habitats and Species Regulations 2017 (as amended) on account of its potential to cause adverse effects on the New Forest protected sites through increased recreational pressure which may occur alone and in-combination with other plans and projects. Many of the special features of the New Forest protected sites afforded protection are vulnerable to adverse effects associated with an increase in 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.

A test of likely significance has been carried out by the relevant Competent Authority (Wiltshire Council). This concluded that given the nature of the development and the absence of any increase in overnight accommodation, there would be no recreational impact on the New Forest, therefore there is no mechanism for adverse effect. The Habitat Regulation Assessment (HRA) has concluded that the application is not likely to have significant impacts on the New Forest SPA, New Forest SAC and New Forest Ramsar site and the proposal is screened out of Appropriate Assessment.

### **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.

A test of likely significance has been conducted by the relevant Competent Authority (Wiltshire Council). This assessment determined that, due to the lack of any increase in water supply, drainage installation within this development, there will be no mechanism for effect on the River Avon SAC catchment. The Habitat Regulation Assessment (HRA) has concluded that the application is not likely to have significant impacts on the River Avon SAC Catchment and the proposal is screened out of Appropriate Assessment.

The proposed package treatment plant and drainage field should be installed, maintained and operated in accordance with the submitted specification and details. Any subsequent replacements should have an equivalent or improved performance specification. The package treatment plant and drainage field should be installed, connected and available for use before the development is occupied and they should be maintained and operated thereafter for the lifetime of the development. The area in which the development is located is within close proximity to the River Avon and may experience flooding and ground water conditions of concern. Primary responsibility for ensuring sewage systems for new developments are adequate lies with the Building Control Department. We would recommend you satisfy yourself that a non-mains sewerage system is appropriate and practicable in the circumstances taking into account ground water conditions throughout the year. For further guidance see the National Planning Practice Guidance "Water supply, wastewater and water quality."

Any installation of a Package Treatment Plant needs to meet approval of Environment Agency's requirements under their permitting role.

### **Protected Species**

Phase 2 surveys for bats and reptiles were undertaken in 2022, with updated walkover surveys in 2024 and 2025. As per CIEEM's (Chartered Institute of Ecology and Environmental Management) Advice Note ([Advice-Note.pdf](#)), referred to in the Government's standing advice on protected species and development, if data was collected over 18 months ago, the results can be considered to be no longer be valid. In this case, given the length of time that has now passed (3 years) as well as the comments below, updated ecological surveys are required.

At the time of the original survey, the site was reported to have suitability for a low population of reptiles. The site was recently cleared of vegetation as stated within the Full Ecological Mitigation report. It is unclear whether this clearance followed the working method statement outlined in the original reptile survey report. This clearance would have an effect on the availability of habitats for the reptile populations. Updated reptiles surveys are required to confirm the current status of the site for reptiles, in line with the consultant ecologist's recommendations.

Three dusk emergence surveys were undertaken by Kingfisher Ecology Ltd in July and August 2022. These surveys identified two day roosts of common pipistrelle and soprano pipistrelle bats within the main house, supporting an estimated 1 to 5 individuals. Updated bat surveys are required, considering the bat surveys were undertaken over 36 months ago. The survey data should be from the most recent survey season, with Natural England's EPS licence application stating surveys should be "up-to-date and have been completed within the current or most optimal recent survey season".

**Bats and their roosts are afforded stringent protection under the Conservation of Habitats and Species Regulations 2017 (as amended) and as such are a material consideration within the planning consultation process. 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 further survey work recommended within the submitted report, including appropriate additional roost inspections, bat surveys and reptile surveys, must be completed and submitted for review by the LPA's ecology team prior to determination. The results should confirm the current status of the bat roosts and may necessitate revisions to the proposed mitigation and enhancement measures, which must be updated and secured accordingly. I therefore maintain a holding objection until all the issues listed above have been suitably addressed.**

The habitat within the proposed development site and the surrounding area is suitable for roosting, foraging and commuting bats. An increase in artificial lux levels can deter bats which could result in roost abandonment and/or the severance of key foraging areas. Any new lighting should be for the purposes for safe access and security and be in accordance with the appropriate Environmental Zone standards set out by the Institute of Lighting Engineers in their publication GN01:2021, 'Guidance for the Reduction of Obtrusive Light' (ILP, 2021), and Guidance note GN08/23 "Bats and artificial lighting at night", issued by the Bat Conservation Trust and Institution of Lighting Professionals. Suitable lighting to ensure dark foraging and commuting routes can be retained could be secured via condition.

The scrub and trees across the site provide suitable nesting habitat for a range of bird species. Where possible, vegetation removal will be scheduled outside the bird breeding season (1st March–31st August) to avoid potential disturbance. If removal during this period is unavoidable, a pre-works nesting bird inspection will be conducted no more than 48 hours before clearance.

### **Biodiversity Net Gain**

From 12 February 2024 Biodiversity Net Gain (BNG) became mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Based on the information available the biodiversity gain planning condition is not considered to apply to this application as the application is for self and Custom Build Development, meaning development which:

- consists of no more than 9 dwellings;
- is carried out on a site which has an area no larger than 0.5 hectares; and

- consists exclusively of dwellings which are self-build or custom housebuilding (as defined in section 1(A1) of the Self-build and Custom Housebuilding Act 2015).

*Note to case officer:* you should be satisfied that the proposals meet the above criteria and act accordingly. Further information will be required from the applicant prior to determination in the event the application is considered to be subject to mandatory biodiversity net gain.

### **Core Policy 50**

Core Policy 50 of the Wiltshire Core Strategy requires all development to demonstrate no net loss of biodiversity and to seek opportunities to enhance biodiversity. The NPPF also encourages applications to deliver measurable net gains (para 187 d).

While it is not expected that this development will result in significant loss of habitat, both CP50 and NPPF requires the inclusion of biodiversity enhancements. Ecological enhancements are provided through the installation of bird and bat boxes, hedgehog dome and bee bricks within the Full Ecological Mitigation report. The location of ecological/biodiversity enhancements must be included in the site plan drawings (Proposed Environmental Protection Plan. 07 August 2025. Whiterok Architecture. Project No. 672. Drawing No. P20. Rev. F) and will become an enforceable part of the planning permission.

### **DRAFT CONDITIONS:**

#### **1. Compliance with submitted documents**

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

- Bundle 4: Full Ecological Mitigation. 31 July 2025;
- Site Ecological Conditions Update Letter. 21 July 2025. Kingfisher Ecology Ltd. Doc Ref. TOV-20240523-Rev B;
- Site Ecological Conditions Update Letter. 22 October 2024. Kingfisher Ecology Ltd. Doc Ref. TOV-20240523-Rev A;
- Bat Emergence and Return to Roost Surveys Report. 22 October 2024. Kingfisher Ecology Ltd. Doc Ref. TOV-17082022-Bat Rev B;
- Phase 2 Reptile Survey Report. 21 October 2024. Kingfisher Ecology Ltd. Doc Ref. TOV-19082022-Rep Rev B;
- Proposed Environmental Protection Plan. 07 August 2025. Whiterok Architecture. Project No. 672. Drawing No. P20. Rev. F;
- C.E.M.P. Preliminary Construction and Environmental Management Plan. 11 August 2025. Benchmark Planning Ltd;
- Arboricultural Survey Impact Assessment & Arboricultural Method Statement. 11 August 2025. RMT Tree Consultancy Ltd. Ref. RMT1055REVA;
- Tree Constraints Plan. August 2025. RMT Tree Consultancy Ltd. Drawing Ref. Appendix 3 – RMT1055 – TCP – Rev A;
- Tree Protection Plan. August 2025. RMT Tree Consultancy Ltd. Drawing Ref. Appendix 4 – RMT1055 – TPP – Rev A;
- BEN 0001: Foul Drainage Proposed Protection Plan. 14 July 2025. Whiterok Ltd;
- The Planning Balance. 14 August 2025. Benchmark Development Planning Ltd.

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

#### **2. Construction Method Statement (CMS)**

No development shall commence on site (including any vegetation removal or works to existing structures), until a Construction Method Statement has been submitted to, and approved in writing by the Local Planning Authority. The Construction Method Statement shall include all precautionary measures to be implemented during the construction period, for the protection of sensitive habitats and species known to be present within or adjacent the site, with particular reference to Bats, Birds and Reptiles.

The development shall be carried out in strict accordance with the approved Construction Method Statement.

REASON: To ensure adequate protection, mitigation and compensation for protected species and priority habitats throughout the construction period.

### 3. Lighting

Prior to commencement of development, a lighting plan that includes a Lux Plot, shall be submitted to the LPA for approval. The plan will demonstrate that bat habitat (trees, scrub and hedgerows) on the perimeter of the site will remain below 0.5 lux.

All lighting provided on site shall be in accordance with the appropriate Environmental Zone standards set out by the Institute of Lighting Engineers in their publication GN01:2021, 'Guidance for the Reduction of Obtrusive Light' (ILP, 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 the amenities of the area and to minimize impacts on biodiversity caused by light spillage to areas above and outside the development site.

### INFORMATIVES:

#### Bat Species

The roof space of (The Old Vicarage, Homington Road, Coombe Bissett, Salisbury, SP5 4LR) is used as a bat roost. Under the Conservation of Habitats and Species Regulations 2017 (as amended), it is an offence to harm or disturb bats or damage or destroy their roosts. Planning permission for development does not provide a defence against prosecution under this legislation. The applicant is advised that a European Protected Species Licence will be required before any work is undertaken to implement this planning permission. Future conversion of the roof space to living accommodation or replacing the roof could also breach this legislation and advice should be obtained from a professional bat ecologist before proceeding with work of this nature.

#### Reptiles

There is a residual risk that reptiles could occur on the application site. These species are legally protected and planning permission does not provide a defence against prosecution. In order to minimise the risk of these species occurring on the site, the developer is advised to clear vegetation during the winter, remove all waste arising from such clearance and maintain vegetation as short as possible in line with the recommendations made in (Phase 2 Reptile Survey Report. 21 October 2024. Kingfisher Ecology Ltd. Doc Ref. TOV-19082022-Rep Rev B). If these species are found during the works, the applicant is advised to stop work and follow advice from an independent ecologist or the Council Landscape and Design Team (ecologyconsultations@wiltshire.gov.uk)

**Sign off by WC Ecologist will only be given once ALL outstanding information has been submitted and agreed sufficient.**

|           |      |
|-----------|------|
| Ecologist | Date |
|           |      |