

## Wiltshire Council Planning Consultation Response

### ECOLOGY

|                            |                                                            |
|----------------------------|------------------------------------------------------------|
| <b>Officer name:</b>       | Jessica Cracknell (Ecologist)                              |
| <b>Date:</b>               | 04/02/2025 <a href="#">22/12/2025 (updated comments)</a>   |
| <b>Application number:</b> | PL/2024/11095                                              |
| <b>Proposal:</b>           | The erection of a self build dwelling and associated works |
| <b>Site address:</b>       | Greenacres, Blounts Court, Potterne, Devizes, SN10 5QF     |
| <b>Case officer:</b>       | Adrian Smith                                               |

#### Recommendations:

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

#### Further Information Required:

|   | Issue                               | Policy/Legislative Compliance | Date information requested & Further information required                                                                                                                                                                                                                                                                                                                                                                                                                                               | Satisfactorily addressed (Document & Date)                                                                                                                                                                                                                                             |
|---|-------------------------------------|-------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Ecological Impact Assessment (EcIA) | Habs Regs, WCA, NPPF, CP50    | <p><b>04/02/2025</b></p> <p>The redline boundary used in the PEA must align with the redline boundary shown in all other site documentation.</p> <p>An updated PEA/Ecological Assessment must be undertaken to determine potential impacts on the following habitats and protected species within the site boundary:</p> <ul style="list-style-type: none"> <li>– Great Crested Newts</li> <li>– Habitats</li> <li>– Priority Habitats including, Traditional Orchard and Deciduous Woodland</li> </ul> | <p><b>YES 22/12/2025</b></p> <ul style="list-style-type: none"> <li>• <a href="#">GCN Report. 09 May 2025. SureScreen Scientifics. Folio No. 688-2025;</a></li> <li>• <a href="#">Preliminary Ecological Assessment Report. 12 May 2025. Greena Ecological Consultancy.</a></li> </ul> |

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 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:

- [GCN Report. 09 May 2025. SureScreen Scientifics. Folio No. 688-2025;](#)
- [Preliminary Ecological Assessment Report. 12 May 2025. Greena Ecological Consultancy;](#)
- Arboricultural Impact Assessment & Method Statement to BS 5837: 2012. Acer Tree Surgeons;
- Appendix 8.1 Arboricultural survey to BS 5837: 2012. 20 November 2024. Acer Tree Surgeons Ltd;
- Appendix 8.2 Tree Protection Plan. 24 November 2024. Acer Tree Surgeons Ltd;
- Design & Access Statement. November 2024. 00/A;
- Planning Statement. November 2024. Context Planning
- Location Plan. 03 December 2024. Planning Portal. Ref. PP-13599607v1;
- Proposed Block Plan. December 2024. 00/A. Project No. OCD\_BAM;
- Site Sections 01. December 2024. 00/A. Project No. OC\_BAM;
- Site Sections 02. December 2024. 00/A. Project No. OC\_BAM;
- Proposed Elevations 01. December 2024. 00/A. Project No. OC\_BAM;
- Proposed Elevations 02. December 2024. 00/A. Project No. OC\_BAM;
- Proposed Elevations 03. December 2024. 00/A. Project No. OC\_BAM;
- Proposed Roof Plan. December 2024. 00/A. Project No. OC\_BAM;
- Proposed GF Plan. December 2024. 00/A. Project No. OC\_BAM;
- Proposed FF Plan. December 2024. 00/A. Project No. OC\_BAM;
- Existing Block Plan. December 2024. 00/A. Project No. OC\_BAM.

### **Salisbury Plain Special Protection Area (SPA)**

This application lies within the 6.4km zone of influence 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.

A strategic Appropriate Assessment (AA) has been prepared pertaining to development within the 6.4km zone of influence that could result in a likely significant effect on the SPA as a result of an increase in recreational / visitor pressure. The AA reached a conclusion of no adverse effects on the integrity of the SPA or its qualifying features provided that the council's mitigation strategy continues to be implemented. Annual stone curlew monitoring and protection measures continue to be secured by the Council.

In July 2024 Natural England (NE) confirmed that the 2024 strategic AA for Salisbury Plain SPA continues to be supported by NE.

### **Protected Species**

~~A Preliminary Ecological Assessment Report has been submitted in support of this application however the redline boundary as identified in figure 2 (Site Plan) within the Preliminary Ecological Assessment Report. 29 November 2023. Greena Ecological Consultancy is different from the redline boundary shown on other documents such as the Proposed Block Plan. December 2024. 00/A. Project No. OCD\_BAM. The redline application boundary and site boundary used for the ecological surveys must match. Therefore, an updated ecological assessment is required which provides sufficient information to determine potential impacts on the habitats and protected species within the site boundary. 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.~~

The Preliminary Ecological Appraisal identified the site as providing moderate potential for foraging and commuting bat species. The hedgerows and trees on site will not be impacted by the proposed development. A number of trees present along the southern boundary of the site have been assessed as having potential roosting features for bats. Under the current proposals, no such trees are scheduled for removal. Should plans change and any of these trees require removal, further surveys will be required and the mitigation measures will need to be revised accordingly. The construction of the new building will not require removal of any vegetation considered to be functionally valuable to foraging or commuting bats and no additional external lighting is proposed as part of the development. Therefore, it is my view that there is no mechanism for adverse effect on bat species.

A lighting condition should be applied to any permission given this application, as detailed below. Any domestic lighting, e.g. at doorways or pathways, should be low level bollard style or wall mounted and pointed downward to avoid light spill onto areas of vegetation likely to be used by bats and other wildlife species.

~~The submitted application currently lacks sufficient information to confirm the presence or absence of Great Crested Newts (GCN). As ponds are present onsite, the applicant must submit a Habitat Suitability Index Assessment, along with eDNA surveys and suitable mitigation for the existing ponds within the site. This information is necessary to accurately assess the potential impact of the proposed development on GCN populations.~~

The eDNA survey concluded that GCN are absent from the pond west of the site. As outlined in Section 8 of the Preliminary Ecological Assessment Report, a precautionary method of working will be undertaken including a sensitive (phased) vegetation clearance.

The woodland and traditional orchard onsite is classified as a priority habitat. In accordance with Core Policy 50, development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term. Where it has been demonstrated that such features cannot be retained, removal or damage shall only be acceptable in circumstances where the anticipated ecological impacts have been mitigated as far as possible and appropriate compensatory measures can be secured to ensure no net loss of the local biodiversity resource.

### **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**

This application does not meet the threshold for Biodiversity Net Gain (BNG), therefore BNG *per se* is not obligatory. However, 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 186 d).

Ecological Enhancements within sections 7 and 8 of the Preliminary Ecological Appraisal are provided through the installation of bat and bird boxes and the planting of native trees during construction of the new building. I am satisfied with the measures proposed to enhance the site for biodiversity which meets the requirements of CP50 and NPPF. The location of the bat and bird boxes must be included in the site plan drawings (Figure 7: Mitigation/Enhancements. Preliminary Ecological Assessment Report. 12 May 2025. Greena Ecological Consultancy) and will become an enforceable part of the planning permission.

Priority Habitat Traditional Orchard and Broadleaved Woodland sits within the site boundary. It is essential that the assessment takes into account the ecological value of these habitats prior to the proposed development including measures should be included to mitigate any adverse impacts, such as habitat creation or retention to compensate for any loss.

Core Policy 50 of the Wiltshire Core Strategy requires all development to demonstrate:

1. No net loss of local biodiversity resource and
2. Secure the integrity of local ecological networks

~~Insufficient information to demonstrate no net loss of the following local biodiversity resource has been submitted:~~

- ~~• Approximately 534m<sup>2</sup> of priority habitat (Deciduous Woodland)~~
- ~~• Approximately 455m<sup>2</sup> of priority habitat (Traditional Orchard)~~

~~The updated ecological assessment must clearly outline which habitats are to be retained within the site, which are to be enhanced and any to be created to demonstrate no net loss of habitat functionality, providing detailed information on how these habitats will be managed or protected throughout the development process. Further information regarding how the proposed changes could potentially impact wildlife, taking into account both direct and indirect effects, must also be provided. Evidence demonstrating no net loss of local biodiversity resource and that the integrity of ecological networks must be submitted and reviewed by the LPA's ecology team prior to a planning permission being given.~~

The Preliminary Ecological Assessment, identifies the traditional orchard in the southern part of the site will be retained, protected and enhanced as part of the proposals. The assessment confirms that this orchard is a priority habitat of ecological value and that it will not be directly affected by built development. Measures proposed to safeguard its functionality, include the retention of the existing trees, protection during construction, and the enhancement of surrounding habitats through sensitive landscaping, wildflower sowing and the creation of buffer areas. Additional native tree and scrub planting will further strengthen habitat connectivity and ecological networks. The measures will be secured through a construction method statement (CMS).

## **CONDITIONS:**

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

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

- GCN Report. 09 May 2025. SureScreen Scientifics. Folio No. 688-2025;

- Sections 7 and 8, and Figure 7 of the Preliminary Ecological Assessment Report. 12 May 2025. Greena Ecological Consultancy;
- Aboricultural Impact Assessment & Method Statement to BS 5837: 2012. Acer Tree Surgeons;
- Appendix 8.2 Tree Protection Plan. 24 November 2024. Acer Tree Surgeons 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, Nesting Birds, Hedgerows, Trees, Woodland and Traditional Orchard.

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

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:

### Protected Species

The applicant should note that under the terms of the Wildlife and Countryside Act (1981) and the Conservation of Habitats and Species Regulations 2017 (as amended) it is an offence to disturb or harm any protected species including for example, breeding birds and reptiles. The protection offered to some species such as bats, extends beyond the individual animals to the places they use for shelter or resting. Please note that this consent does not override the statutory protection afforded to any such species. In the event that your proposals could potentially affect a protected species you should seek the advice of a suitably qualified and experienced ecologist and consider the need for a licence from Natural England prior to commencing works. Please see Natural England's website for further information on protected species.

### Final sign off – all matters addressed:

|                                       |                           |
|---------------------------------------|---------------------------|
| Ecologist<br><b>Jessica Cracknell</b> | Date<br><b>22/12/2025</b> |
|---------------------------------------|---------------------------|