

## Wiltshire Council Planning Consultation Response

### ECOLOGY

|                            |                                                                                                                                                 |
|----------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Officer name:</b>       | Jenna Buss                                                                                                                                      |
| <b>Date:</b>               | 12/02/2026                                                                                                                                      |
| <b>Application number:</b> | PL/2023/10495                                                                                                                                   |
| <b>Proposal:</b>           | Conversion of Elmfield House and outbuildings to 6 x dwellings and the erection of 15 dwellings, hard and soft landscaping and associated works |
| <b>Site address:</b>       | Elmfield House, Petersfinger, SP5 3BZ                                                                                                           |
| <b>Case officer:</b>       | Sarah Hill                                                                                                                                      |

#### Recommendations:

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

#### Further Information Required:

|  | Issue                     | Policy/Legislative Compliance | Date information requested & Further information required                      | Satisfactorily addressed (Document & Date) |
|--|---------------------------|-------------------------------|--------------------------------------------------------------------------------|--------------------------------------------|
|  | Protected Species Bats    | Habitat Regulations           | Details of bat roosts to remain, roosts to be lost and Bat mitigation on plans |                                            |
|  | Protected Species Dormice | Habitat Regulations           | Dormouse surveys aligned with best practice techniques                         |                                            |
|  | No Net Loss               | CP50, NPPF                    | EPP demonstrating no net loss of biodiversity                                  |                                            |
|  | River Avon Hampshire SAC  | Habitat Regulations           | A completed River Avon SAC: nutrient neutrality calculator                     |                                            |

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.

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:

- Preliminary Ecological Appraisal Report. September 2023. Daniel Ahern Ecology
- Soft Landscape Plan 414\_PN\_02 C. July 2025. New Enclosure Landscape Consultants

- Bat Survey Report. September 2025. Danial Ahern Ecology
- UK Hab 2.0 Survey Report and BNG. June 2025. Daniel Ahern Ecology
- Response to Ecology Objections. July 2025. Daniel Ahern Ecology

Please note that these comments should be read in conjunction with our previous response dated 30/04/2024

### **Protected and Notable Species/Habitats**

We welcome the additional information submitted in support of the application.

Priority habitat in the form of deciduous woodland is identified as comprises the majority of the site. Evidence indicates that previous clearance works have created a mosaic of scrub, woodland, and grassland habitats. No impact assessment has been provided for the loss of these habitats, and although recommended, a habitat mitigation and enhancement strategy has not been submitted in support of the application.

#### Bats

Internal access to Elmfield House was achieved in early 2025. Extensive droppings were discovered and confirmed as serotine but no further assessment on the status of serotine roosting in light of this has been made. Static detectors were left in the attic space between January and February 2025, no activity was detected and hibernation use of the site has been ruled out.

Initial surveys confirmed a maternity roost of brown long eared bats together with recorded emergences of common and soprano pipistrelle, serotine and a myotis bat.

Updated activity surveys in August and September 2025 confirmed continued use by brown long eared, serotine and soprano pipistrelle, assessed as day roosts. Continued maternity use of the site cannot be ruled out as the updated surveys were undertaken outside of the maternity period. It should therefore be assumed that maternity use of the site remains and suitable mitigation should be provided to mitigate for these impacts.

A brown long eared bat was seen entering and re emerging from building 4 during the 2023 surveys. The updated surveys in 2025 have confirmed day roosts for brown long eared and soprano pipistrelle bats.

Mitigation is proposed in the form of bat boxes to be erected on trees on site together with the creation of a bat loft and provision of bat tubes within the new buildings. However, it is unclear which bat roosts will be impacted by the proposals and which will be retained. The details of the location of the loft void provision and access points is also not specified. Additional information to include details of which bat roosts are to be lost, those to be retained and the location of bat mitigation on technical drawings is required prior to determination. This should be included within an Ecological Parameters Plan.

Any trees to be lost to the development must be assessed for their potential to support bat roosts, any trees with moderate or high potential must be assessed for their potential to support bat roosts and where found, suitable mitigation must be included within the ecological parameters plan.

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. Sufficient and appropriate mitigation measures to ensure that bats are not adversely affected as a result of the proposed development must be submitted as part of

the proposal, and shown on development drawings, where bats are present, or likely to be present.

The current proposal conflicts with Core Policy 50 of the adopted Wiltshire Core Strategy 2015 and Paragraphs 192 (b) and 193 (a) of the National Planning Policy Framework December 2024, because mitigation is not included in the proposal.

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 LPAs ecology team prior to determination of the application.

#### Otter

The ecology report indicates that the ditch running through the site will be “retained in its current state,” but the condition of this feature has not been described. Although no evidence of otter activity was recorded during site surveys, records exist nearby, and the potential for the ditch to support commuting otter should be considered. The current Soft Landscape Plan does not provide sufficient detail regarding the ditch, and it appears that fencing associated with the proposed development may restrict future management and access. Further information/clarification is required and should be included within the ecological parameters plan. This should include long term management and measures to maintain or enhance this area to ensure retention of its ecological function.-term management and measures to maintain or enhance

#### Dormice

Dormice were scoped out of further assessment on the basis of presumed limited habitat connectivity; however, records occur in close proximity within habitat functionally linked to the site. Evidence shows that dormice will cross open areas such as roads, and the habitats both within the site and adjacent to the park and ride are suitable to support the species. These areas also connect to the railway corridor, providing further connectivity to the wider landscape. Although a nut search is referenced, no details have been provided, and given the unclear extent of fruiting hazel on site, this method may not be sufficient to determine dormouse presence. Additional consideration is therefore required. Further survey work should be undertaken prior to determination to robustly assess the potential for dormice to be present. Surveys should be carried out in line with Best Practice methodology.-and-ride are suitable to support the species. These areas also connect to the railway corridor, providing further

#### Reptiles

A reptile translocation site has been provided however, from the Landscape Plans it would appear that this area will undergo management. Additional information will be required to ensure reptiles are protected during the works and suitable habitat will be provided to support reptiles post development. A reptile mitigation strategy will be required prior to commencement, this could be secured by condition.

#### **No Net Biodiversity Loss**

Although the application was submitted prior to the mandatory implementation of Biodiversity Net Gain, the development must nonetheless demonstrate that it will achieve no net loss of biodiversity in accordance with Core Policy 50.

The UKHab 2.0 Survey Report identifies a mosaic of habitats across the site. The proposed development would result in a 32% reduction in calculated biodiversity value post development. Based on the projected post development habitat plan, it is unclear how Core Policy 50 will be met or how ecological functionality will be maintained.-development. Based on the projected

post-development habitat plan, it is unclear how Core Policy 50 will be met or how ecological functionality will be maintained.

To address this, a detailed Ecological Parameters Plan is required. This plan must clearly set out the habitats to be retained and created, as well as demonstrate how ecological connectivity will be maintained throughout the site and to the wider area. The plan should be informed by further species surveys undertaken prior to determination.

#### **Hampshire River Avon Special Area of Conservation (SAC) 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 (AA) 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 completed River Avon SAC: nutrient neutrality calculator has not been submitted. Applications must submit a completed calculation in an unlocked Excel file for the Council's ecologist to approve. The approved calculation is required to enable the AA to be undertaken, which must be completed, and the conclusion agreed with Natural England prior to the application being determined.

Guidance on completing the phosphorus budget is available on our website ([Phosphorus and nitrogen mitigation - Wiltshire Council](#)). This webpage also contains information on the options available for developments to achieve nutrient neutrality.

#### **New Forest protected sites: Recreation Mitigation Strategy for the New Forest Internationally 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.

Following a Cabinet decision on 7 May 2024, Wiltshire Council's "Interim recreation mitigation strategy for the New Forest internationally protected sites" (Version 1.1, 21 March 2023) is being revised. Cabinet approved revised mitigation measures to manage recreational pressures on the New Forest protected sites, including the cessation of use of Community Infrastructure Levy (CIL) to fund Strategic Access Management and Monitoring (SAMM) measures for minor residential development (1-49 dwellings) and tourism / visitor accommodation within the 13.8km zone of influence. Instead, SAMM measures are to be funded by developer contributions at a rate of £612 (plus legal fees) per unit of residential or tourism accommodation. This revision applies to all development that will result in a net increase in accommodation units within the 13.8km zone of influence from the New Forest protected sites and therefore applies to this

application. Evidence for the revised approach derives from the New Forest SAMM Report (Footprint Ecology, October 2023) which can be found here: [Research into recreational use of the New Forest's protected habitats - New Forest National Park Authority \(newforestnpa.gov.uk\)](https://www.newforestnpa.gov.uk/research-into-recreational-use-of-the-new-forest-s-protected-habitats). The New Forest SAMM Report was commissioned by all the local planning authorities with areas lying within the 13.8km zone, in order to identify and implement a consistent strategic approach to mitigation across the zone of influence.

It will therefore be necessary for developer contributions of £612 per dwelling / tourism unit (plus legal fees) to be paid prior to commencement of development and secured via legal agreement. In the absence of a S106 the fee can be paid by a section 111 agreement. Where the applicant elects to use the S111 process the fee must be paid and S111 signed by both the applicant and the council on the granting of planning permission. This will enable the Council to conclude, subject to endorsement from Natural England, that the development proposed by means of this application will not lead to significant adverse effects on the New Forest protected sites alone or in-combination with other plans and projects.

In summary, the Ecology objection is due to lack of information that demonstrates that the proposal would be compliant with CP50 and NPPF and would not result in significant adverse impacts to protected habitats and species. This objection could be overcome by submission of additional information to include:

- Details of the bat roosts to be lost and those to be retained
- Details of the proposed bat loft on technical drawings including location and access points as well as dimensions
- Assessment of the impacts on dormouse and where required surveys which conform to best practice
- An EPP demonstrating areas of the site which are unconstrained, those areas where sensitive design or restrictions may be required, and any areas of the site which are to be retained, remain undeveloped, enhanced, form part of the landscaping
- A completed River Avon SAC: nutrient neutrality calculator

**Final sign off – all matters addressed:**

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|-------------------------|------|
| Ecologist<br>Jenna Buss | Date |
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