

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Elizabeth Burrows, Senior Ecologist
Date:	24/09/2025, 05/05/2026 (red text)
Application number:	PL/2025/06688
Proposal:	Demolition of existing dwelling. Erection of replacement dwelling with associated access, parking, landscaping and private amenity space
Site address:	Highlands Farm House, Herridge, Collingbourne Ducis, Marlborough, SN8 3EG
Case officer:	Jonathan James

Recommendations:

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

Matters Considered:

Thank you for consulting ecology. The following reports and plans have been reviewed alongside the relevant submissions and information:

- Nutrient Assessment and Budget. Highlands Farmhouse, Highlands Farm, Collingbourne Dicus, Wilts. Issue 2. (Aqua Callidus, 11/07/2025).
- Ecological Assessment Report. Highlands Farmhouse, Highlands Farm, Collingbourne Dicus, Marlborough SN8 3EG. (ABR Ecology Ltd., 30th July 2025).
- Proposed Site Plan. 240203-100. Rev B. (Fowler Architecture and Planning, March 2025).
- Proposed Elevations. 240203-102. (Fowler Architecture and Planning, March 2025).
- Proposed Site Plan. 240203-100. Rev D. (Fowler Architecture and Planning, March 2025).
- Proposed Elevations. 240203-102 Rev A. (Fowler Architecture and Planning, March 2025).
- Ecological and BNG Assessment (BNGA). Highlands Farmhouse, Highlands Farm, Collingbourne Dicus, Marlborough SN8 3EG. (ABR Ecology Ltd., 4th March 2026).
- The Statutory Metric (04/03/2026).

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date submitted)
1	Biodiversity Net Gain	Town and Country Planning Act 1990	Confirmation of baseline: • Inclusion of hedgerow degradation in baseline. • Clarification of site area.	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.

The Ecological Impact Assessment identifies impacts on roosting bats, nesting birds, hedgerows, and priority habitats at the site boundary. However, as the development affects an existing property and garden, and with appropriate mitigation, the risk of significant adverse ecological effects is limited. The ecological submission is of high quality, and the integration of recommended mitigation measures into the submitted development plans is welcomed.

Surveys conducted in 2024 confirm the presence of day roosts for brown long-eared, serotine, and common pipistrelle bats. An EPS bat mitigation licence will be required in order to lawfully commence development, if approval is forthcoming. The information provided is sufficient to ensure the favourable conservation status of these species can be maintained.

The Proposed Site Plan includes replacement planting for lost hedgerow sections and incorporates mitigation measures outlined in the Ecological Impact Assessment. Accordingly, significant adverse impacts on biodiversity are not anticipated, and the development would comply with Policy CP50.

Habitat Regulations Assessment (HRA)

Hampshire River Avon Catchment

A test of likely significance has been carried out by the relevant Competent Authority (Wiltshire Council) as required by Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended). This concluded that as this is a replacement dwelling there is no mechanism for adverse effect. The HRA has concluded that the application is not likely to have significant impacts on the River Avon Hampshire Catchment SAC and subsequently the application is screened out of Appropriate Assessment.

The Nutrient Assessment confirms that the existing dwelling is served by a septic tank and that this will be replaced with a new Package Treatment Plant PTP (Graf One2Clean). This PTP is on Natural England's List of Certified Small Wastewater Treatment System and the resulting nutrient reduction is welcomed.

Salisbury Plain 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 March 2025 Natural England (NE) confirmed that the 2024 strategic AA for Salisbury Plain SPA continues to be supported by NE.

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). The Biodiversity Gain Plan condition will automatically apply if approval is forthcoming.

A completed statutory metric calculation (The Statutory Metric (04/03/2026) with the baseline and predicted post- development biodiversity units of the site has been submitted (including the condition assessment sheets and plans within Appendix E of the Ecological and BNG Assessment (BNGA) (ABR Ecology Ltd., 4th March 2026).

On-site pre-development (baseline) biodiversity value	TBC Habitat units
	TBC Hedgerow units
	TBC Watercourse units
Are there any <u>irreplaceable</u> habitats on-site?	No
Has any habitat <u>degradation</u> of occurred?	No

The following issues must be addressed in the baseline prior to determination:

- It is reported that two sections of hedge have been removed (refer to para 3.9, Table 9, photo 42 and photo 27 in Appendix D). In accordance with guidance relating to degradation and legislation these sections of hedge must be included in the base line.
- The Application Form states that the site area is 0.48 hectares where as it is recorded as 0.53 in the metric. The site area must align in all submissions.

Confirmation of how the development will achieve BNG is a post-determination matter however consideration should be given to how any proposed BNG will be secured. The post-development habitats plan submitted for the discharge of the Biodiversity Gain Plan must align with the approved Site Plan and detailed landscape plans. It is noted that the current Post-development habitats plan does not align with the Proposed Plans. Where appropriate, post-development habitats should correspond directly with the detailed landscape proposals. For example, areas of meadow, retained vegetation, and proposed tree planting should be accurately reflected within the BNG metric. It is noted that these habitat types are currently included as vegetated garden.

Off-site Biodiversity Gain Site

The Ecological and BNG Assessment states that it is intended that land outside the red line boundary (off-site) would be enhanced to achieve a 10% gain.

All land located outside the redline application boundary of the development site is considered off-site and must be secured by legal agreement (refer to information here [Make off-site biodiversity gains as a developer - GOV.UK](#)).

All off-site biodiversity gains sites must be registered on the national biodiversity gains site register. Guidance on how to register a biodiversity gains site including a list of item required to apply can be found here - [Register a biodiversity gain site - GOV.UK](#). In order for the Biodiversity Gain Plan condition to be discharged all off-site gains must be shown on the Biodiversity Gain Plan as allocated to this development on the national biodiversity gains site register.

~~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.~~

CONDITIONS:

The following, or similarly worded, conditions are recommended:

Compliance with submitted documents

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

- Proposed Site Plan. 240203-100. Rev D. (Fowler Architecture and Planning, March 2025).
- Proposed Elevations. 240203-102 Rev A. (Fowler Architecture and Planning, March 2025).
- ~~Mitigation measures detailed in Section 4 of the Ecological Assessment Report. Highlands Farmhouse, Highlands Farm, Collingbourne Dicus, Marlborough SN8 3EG. (ABR Ecology Ltd., 30th July 2025).~~
- Mitigation measures detailed in Section 5 and Appendix 7 of the Ecological and BNG Assessment (BNGA). Highlands Farmhouse, Highlands Farm, Collingbourne Dicus, Marlborough SN8 3EG. (ABR Ecology Ltd., 4th March 2026).
- ~~Appendix 1 Bat and biodiversity mitigation and enhancement plan (pages 69 – 74) of the Ecological Assessment Report. Highlands Farmhouse, Highlands Farm, Collingbourne Dicus, Marlborough SN8 3EG. (ABR Ecology Ltd., 30th July 2025).~~

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

Water Efficiency

The overnight development hereby approved shall be designed to ensure it does not exceed 110 litres per person per day water consumption levels (which includes external water usage) and a water efficiency assessment should be submitted. Before the development is brought into use, a water efficiency report certifying that this standard has been achieved shall be submitted to the local planning authority for its written approval.

REASON: To ensure compliance with the prevailing mitigation strategy for nutrient neutrality in the water catchment within which this development is located.

A water efficiency calculation will be needed to discharge this condition. For guidance on how to do this and what is required, please refer to the following document: '*The Building Regulations 2010 – Sanitation, hot water safety and water efficiency*', Appendix A (p36-44).

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/504207/BR_PDF_AD_G_2015_with_2016_amendments.pdf

Informatives:

Roosting Bats

The roof space of (Highlands Farm House) 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.

General 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	Date
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