

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jessica Cracknell
Date:	10/09/2026
Application Number:	PL/2026/03842
Proposal:	Regulation 77 Application for approval under the Conservation of Habitats and Species Regulations 2017. re PL/2024/10157 - Prior Approval Part 3 Class Q, conversion of buildings to five dwellings
Site Address:	Plymouth, Stock Lane, Landford, Salisbury, SP5 2EW
Case Officer:	Joe Richardson

Recommendations:

☐	No Comment
☐	Support
☐	No objection
☐	Condition (no objection subject to conditions)
☒	Objection - further information required
☐	Objection in principle
☒	HRA required: New Forest Protected Sites, River Test Catchment, Mottisfont Bats SAC

An Appropriate Assessment for impacts on the New Forest Protected Sites has been completed and sent to Natural England for their agreement that the HRA can be favourably concluded. There is a statutory 21-day response window. The application must not be approved until NE have endorsed the conclusion of the AA.

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date submitted)
1	River Test Catchment <i>Solent Maritime Special Area of Conservation (SAC), Chichester and Langstone Harbours Special Protection Area (SPA) and Ramsar site, Portsmouth Harbour SPA and Ramsar site, Solent and Southampton Water SPA and Ramsar site.</i>	CP50, NPPF, WCA, Habs Regs	10/09/2026 A completed River Test Calculation: nutrient neutrality calculators in an unlocked Excel file must be submitted with the correct information. (see comments in main text)	NO
2	Mottisfont Bats SAC	Habs Regs, WCA, NPPF, CP50	10/09/2026 Assessment of the impacts of Bats in relation to Mottisfont Bats SAC Submitted Regulation 77 Shadow Appropriate	NO

			Assessment identifies that bat emergence surveys were undertaken in 2021 which is considered to be out of date. Updated surveys are required to establish the likely impacts on Annex II bats, including potential effects on key foraging and commuting routes and roosting bats.	
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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:

- Regulation 77 Shadow Appropriate Assessment. June 2026. Holbury Consultancy Services. Ref. Final;
- Natural England Nutrient Neutrality budget calculator for the The Solent Marine Sites;
- Buildings at Plymouth Cottage, Stock Lane, Landford. 19 October 2022. Find Professional Mapping Intelligence. Ref. BHP/0224;
- Site Plan. July 2024. Robert Davis. Drawing No. 2604/12.

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.

In line with the Councils Interim Mitigation Strategy, the applicant has agreed to pay the SAMM payment requirements of £660 per dwelling/tourism unit (plus legal and admin fees). This will be secured via a S111 agreement at determination. Unilateral undertakings or s106 agreements are also available to ensure the necessary mitigation is secured.

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.

The cost of developer contributions to mitigate the burden would be £3,300 plus legal and admin fees.

The applicant should be directed to the Guidance Note for Completing Agreements Under S111 of the Local Government Act 1972.

It is considered that this approach delivers the required level of certainty to secure effective mitigation for the recreational burdens of this planning application. There will be no in combination effects with other developments, therefore we can conclude that there would be no adverse effect on the integrity of the above European Sites as a result of the development.

River Test Catchment

Solent Protected Sites - Solent Maritime Special Area of Conservation (SAC), Chichester and Langstone Harbours Special Protection Area (SPA) and Ramsar site, Portsmouth Harbour (SPA) and Ramsar site, Solent and Southampton Water (SPA) and Ramsar site.

This development falls within the catchment of the River Test which drains into the Solent Protected Sites and has potential to cause adverse effects alone or in combination with other developments through discharge of nitrogen 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.

Nitrogen budget

In line with Natural England's Advice on Nutrient Neutrality, a calculation of the nitrogen burdens of the proposal is required. Natural England has issued guidance and a calculator tool to be used by applicants and this is available here: [Solent: nutrient neutrality calculator - GOV.UK](#)

A nitrogen budget has been submitted. The nitrogen budget is NOT in line with Natural England's advice. We advise that the budget is updated to address the following issues:

1. The nutrient budget identifies the current land use as 'poultry'. The current land use should reflect the appropriate classification in line with guidance on the nutrient neutrality calculator ([Using the nutrient neutrality calculators – GOV.UK](#)). As outlined in Natural England's response on the application the use of the 'poultry' land use category applies to open air chicken facilities rather than poultry buildings. Only uncovered areas used by chickens should use the calculator's poultry export rate. The areas occupied by the buildings and associated hardstanding are therefore more appropriately classified as a 'commercial/industrial urban land'. Further information and justification is required to demonstrate how the land in question is functionally and physically managed as 'poultry'. This information is necessary to ensure the nutrient budget accurately reflects the existing land use.
2. Mitigation strategy: The application does not currently demonstrate how the increase in nitrogen will be mitigated. Wiltshire Council has a strategic nitrogen mitigation scheme to available to applicants located in the River Test catchment in Wiltshire. A nutrient mitigation strategy must be provided confirming to avoid and mitigate nitrogen burdens.

The calculation must be amended to address these issues, or suitable justification provided, and resubmitted to the Council for approval. The calculation must be approved by the council 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 nitrogen 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.

Until a mitigation scheme has been agreed, it is unlikely that an Appropriate Assessment for this development could conclude with sufficient certainty that there will be no adverse effects on the Solent SACs and SPAs, alone and in-combination with other plans and projects.

Habitat Regulations Assessment (HRA): Mottisfont Bats Special Area of Conservation (SAC)

The application site is within a consultation zone for Barbastelle bats associated with the Mottisfont Bats Special Area of Conservation (SAC) and therefore has potential to result in significant adverse impact on the special features of that site. Appropriate Assessment (AA) under Section 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) 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.

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 (5 years), updated bat surveys are required. The submitted Regulation 77 Shadow Appropriate Assessment acknowledges that the surveys are out of date and that updated survey work has been instructed over summer 2026. Results of these surveys must be submitted to the LPA for

review. The results should confirm the current status of the site and may necessitate revisions to the proposed mitigation and enhancement measures, which must be updated and secured accordingly.

In the absence of up-to-date survey data, it must be assumed that Annex II bats associated with the SAC are utilising the site. Any potential habitat loss or disturbance must therefore be fully assessed. The results should demonstrate that sufficient and proportionate mitigation will be delivered, with monitoring to be secured as necessary, in line with the conservation objectives of the Bats SAC. Insufficient information has so far been submitted to enable the AA to be undertaken, which must be completed and the conclusion agreed with Natural England prior to the application being determined.

To ensure the application is policy compliant and to enable the council to complete the HRA the applicant must adhere to guidance in the Bat SAC developers' guidance ([Bat SAC Developers Guidance inc Bath Bradford on Avon Chilmark and Mottisfont](#)).

Brown Long-Eared and Common Pipistrelle Non-Breeding Day Roost

The submitted Regulation 77 Shadow Appropriate Assessment states that emergence surveys undertaken in 2021 identified bats emerging from Barn 2. The level of usage recorded, together with the presence of bat droppings, demonstrated that the building supports an occasional, non-breeding day roost used by low numbers of common pipistrelle and brown long-eared bats. Any impacts to the identified roost used by brown long-eared and common pipistrelle bats will need to be appropriately mitigated and fully addressed through a European Protected Species Licence application to demonstrate how the roosting opportunity will be maintained and protected. The roof space of Plymouth, Stock Lane, Landford, Salisbury, SP5 2EW 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.

IN SUMMARY: Insufficient information has been submitted. 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. I therefore maintain a holding objection until all the issues listed above have been suitably addressed.

CONDITIONS: these will be added once the issues above have been addressed

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

Ecologist	Date