

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jenna Buss
Date:	19/02/2025
Application number:	PL/2021/04084
Proposal:	Residential development of 49 no. new dwellings comprising development on land to the west of Roger Way (Areas A&F), alongside the change of use of the vacant ground floor unit at Block C of the Old Sarum Local Centre (Area G), to provide for 7no. affordable apartments
Site address:	Land to the west of Roger Way and Old Sarum Local Centre (Block C), Old Sarum, Salisbury, Wiltshire
Case officer:	Joe Richardson

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)
1	River Avon Hampshire Catchment – Nutrient Neutrality	Habitat Regulations	Resubmission of the latest nutrient calculator and proposed mitigation strategy	

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:

- Planning Layout. August 2023. Persimmon
- Nutrient Neutrality Assessment. Betts Hydro
- Ecological Impact Assessment. July 2024. GE Consulting
- Detailed Landscape Proposals Plan. April 2023. Golby and Luck
- Fencing and Enclosures. August 2023. Persimmon

- BNG Statement and Assessment. July 2024. GE Consulting
- Natural England Nutrient Calculator

We note the previous ecology response submitted January 2024 and welcome the additional information submitted to support the application.

Protected and Notable Species/Habitats

We note the proposal to create additional accommodation at Roger Way and convert an existing building at Crosier Close. We welcome the additional information submitted in the updated ecology report. Although no protected or notable species were recorded on site during the site visit, there is potential for the site to support reptiles and nesting birds together with foraging and commuting routes for bats.

Due to the adjacent lighting at the sports pitches, it is anticipated that lighting impacts already occur at the site. However, section 6.1.6 of the ecology report recommends sensitive lighting in accordance with current guidance to ensure continued use of the site by bats which is welcomed and could be secured by condition.

The site was assessed as having low potential to support reptile species and although no surveys were undertaken at the site, precautionary working methods to reduce impacts to reptiles has been included, this method should be included within a Construction Environment Management Plan and secured by condition.

In ensuring no net loss of biodiversity on site in accordance with Core Policy 50, we welcome the proposed habitats to be created as outlined within the Landscape Plan together with the enhancements outlined in section 8 of the ecology report. These enhancements, to include bird boxes, bat boxes and hedgehog passes could be secured by condition.

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 nutrient calculation has been submitted however the following issues were identified:

- The most recent nutrient budget calculator has not been used and;
- The water use per day should read 120 l/p/d unless full justification as to why this should be lower can be evidenced.

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 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. A mitigation proposal should also be submitted in support of the updated budget to ensure nutrient neutrality can be achieved. Further details of the Council-led scheme, including eligibility criteria, current cost to purchase credits, and details of how to apply, is available on our website [Phosphorus and nitrogen mitigation - Wiltshire Council](#).

BNG

This application was submitted prior to Biodiversity Net Gain (BNG) becoming mandatory on 12th February 2024, 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 193d).

Final sign off – all matters addressed:

Ecologist Jenna Buss	Date
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