Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name: **Fiona Elphick, Senior Ecologist** **FINAL COMMENTS**
Date: 29/5/2025
Application No: **20/03485**
Proposal: . Proposed redevelopment of site with a new hotel (Use Class C1).
Site Address: Treetops, Amesbury Road, Bulford, Salisbury, Wiltshire, SP4 9NU
Case Officer: **Georgina Wright**

Recommendations:

	No Comment
	Support
	No objection
x	Condition (no objection subject to conditions)
	Objection - further information required
	Objection in principle
x	HRA – this is covered by a Strategic Appropriate Assessment agreed with Natural England

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required (Leave blank if further information not required)	Satisfactorily addressed (Document & Date)

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 further consultation on the above application. I have reviewed the additional 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. Additional information considered:

- Nutrient Neutrality Assessment and Mitigation Strategy, Duckwuitt Limited, doc ref 21088-NUT-RP-01/CO2, author Water Environment Ltd.

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.

The submitted nutrient calculation [ref] calculated a total phosphorus budget of 3.21 kg TP/year. The budget has been approved by Wiltshire Council.

A Council-led scheme of phosphorus credits will be available for development which meets certain criteria at a fixed cost per kilogram of phosphorus, provided supply of mitigation is available. A completed Hampshire Avon Credit Screening Approval Certificate is required to apply for this scheme. The ecology section of this certificate has been completed by the Council's ecology team for this application. This certificate can only be issued by the case officer if the application meets the two deliverability tests. 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.

Ecology officer approval **Approval of Nutrient Budget**	• **Document reviewed –** Nutrient Neutrality Assessment and Mitigation Strategy, Duckwuitt Limited, doc ref 21088-NUT-RP-01/CO2, author Water Environment Ltd. **Budget - 3.21 kg TP/year** **Budget approved - Yes** **Date - 30/5/2025**

A strategic Appropriate Assessment (AA) has been prepared for qualifying planning applications for residential and non-residential development, within sewered and non-sewered areas of the River Avon SAC catchment. The AA reached a conclusion of no adverse effects on the integrity of the SAC or its qualifying features and has been endorsed by Natural England (NE) provided that the council's mitigation strategy continues to be implemented.

These comments assume that this application qualifies for and will be proceeding with the Council-led scheme.

The administration charge for the scheme must be paid prior to determination through a section 111 agreement to reserve the allocation of mitigation. The mitigation fee is payable on commencement of development, and this can be secured through a section 106 agreement or through a unilateral undertaking. If applicants wish to use a section 111 agreement to pay for mitigation, then this will need to be paid prior to determination.

If the application does not qualify for the Council-led scheme, or the applicant decides not to proceed with the scheme, details of an alternative mitigation strategy must be submitted for review and the Council's ecology team consulted. Any alternative mitigation scheme would be subject to a bespoke Appropriate Assessment.

Once the required legal agreements have been drawn up, in order to secure the mitigation within the planning process, the Water Efficiency Condition and Informative, as set out below, must be applied to any permission given this application.

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 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). Based on the information available the biodiversity gain planning condition is not considered to apply to this application as the application for planning permission was made before 12 February 2024

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.

Compliance with Wiltshire Core Policy 50

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). The site currently comprises areas of hardstanding. In order to align both CP50 and NPPF, significant enhancement of natural features within the site and particularly around boundaries, will be required. This should be presented in the form of a detailed Landscaping and Ecological Enhancement Plan. Please see condition below.

Summary

I am happy to lift any remaining ecological objections, if the following ecological conditions are added to any permission you are minded to grant this application.

CONDITIONS:

1. **Hampshire Avon Phosphorous Mitigation**

   The development hereby permitted shall not commence until evidence of compliance to the Wiltshire Council River Avon Special Area of Conservation Mitigation scheme, or an alternative approved mitigation package addressing the additional nutrient input arising from the development, has been submitted to, and approved in writing by the Local Planning Authority.

   REASON: To accord with the Conservation of Habitats and Species Regulations 2017, and Wiltshire Core Strategy Core Policy 69.

2. Compliance with permitted documents

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

- Lighting design detailed in the Stonehenge Hotel External Lighting Report by The Engineering Practice, October 2020

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

3. Construction Environment Management Plan (CEMP)

Prior to the commencement of works, including demolition, ground works/excavation, site clearance, vegetation clearance and boundary treatment works, a Construction Environmental Management Plan (CEMP) shall be submitted to the local planning authority for approval in writing. The Plan shall provide details of the avoidance, mitigation and protective measures to be implemented before and during the construction phase, including but not necessarily limited to, the following:

a. Identification of ecological protection areas/buffer zones and tree root protection areas and details of physical means of protection, e.g. exclusion fencing.
b. Working method statements for protected/priority species, such as nesting birds and reptiles.
c. Mitigation strategies already agreed with the local planning authority prior to determination, such as for great crested newts, dormice or bats; this should comprise the pre-construction/construction related elements of strategies only.
d. Work schedules for activities with specific timing requirements in order to avoid/reduce potential harm to ecological receptors; including details of when a licensed ecologist and/or ecological clerk of works (ECoW) shall be present on site.
e. Key personnel, responsibilities and contact details (including Site Manager and ecologist/ECoW).

Development shall be carried out in strict accordance with the approved CEMP.

REASON: To ensure adequate protection and mitigation for ecological receptors prior to and during construction, and that works are undertaken in line with current best practice and industry standards and are supervised by a suitably licensed and competent professional ecological consultant where applicable.

4. Detailed Landscaping and Ecological Enhancement Plan

Prior to the start of construction, a detailed Landscaping and Ecological Enhancement Plan for the site will be submitted to the LPA for review and approval by their Ecologists. The site is currently almost devoid of vegetation, being mostly hard standing with some limited areas of poor quality amenity grassland. The plan will detail all planting and indicate the type, number and location of features to enhance the site for biodiversity, such as bat and bird boxes, insect hotels, etc., as well as areas of new habitat created.

REASON: To ensure enhancement of the local habitat for a range of wildlife species.

5. Landscape and Ecological Management Plan (LEMP)

Prior to the start of construction, a Landscape and Ecology Management Plan (LEMP) shall be submitted to and approved in writing by the Local Planning Authority. The LEMP will include long term objectives

and targets, management responsibilities and maintenance schedules for each ecological feature within the development, together with a mechanism for monitoring success of the management prescriptions, incorporating review and necessary adaptive management in order to attain targets.

The LEMP shall be implemented in full and for the lifetime of the development in accordance with the approved details.

REASON:
To ensure the long-term management of landscape and ecological features retained and created by the development, for the benefit of visual amenity and biodiversity for the lifetime of the scheme.

6. Water Efficiency in River Avon and River Test Catchments

The residential 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). Within 3 months of each phase being completed and the housing being 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.

INFORMATIVE:

Hampshire Avon Phosphorus Mitigation

Evidence of compliance to the Wiltshire Council River Avon Special Area of Conservation Mitigation Scheme means the certificate of allocation of credits and confirmation of financial contribution to the scheme.

An alternative mitigation package must be approved by the local planning authority and Natural England with evidence of allocation to the scheme.

Sign off by WC Ecologist to be given once all outstanding information has been submitted and agreed sufficient.

Ecologist	Date
Fiona Elphick, Senior Ecologist	**29/5/2025**