

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jenna Buss
Date:	13/08/2025
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
x	Condition (no objection subject to conditions)
	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	Yes Updated Nutrient Neutrality Calculator received by email 1/08/2025

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 GL2113 01F. April 2023. Golby and Luck
- Fencing and Enclosures. August 2023. Persimmon
- BNG Statement and Assessment. July 2024. GE Consulting
- Natural England Nutrient Calculator -Apartments
- Natural England Nutrient Calculator- Rogers Way- received by email 01/08/2025
- Environmental Lighting Impact Assessment Report. June 2025. SHD Lighting Consultancy

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 surveys, 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.

The submitted nutrient calculations calculated a total phosphorus budget of 4.24kg TP/year pre 2030 and 1.06kg TP/year post 2030 for the Rogers Way Site and 0.68kg TP/year pre 2030 and 0.17kg TP/year post 2030 for the apartments site. Giving a total budget of 4.92kg TP/year pre 2030 and 1.23kg TP/year post 2030 for the combined sites. 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	Document reviewed – 13/08/2025
	Pre 2030 budget - 4.92 kg TP/year
Approval of Nutrient Budget	Budget approved - Yes
	Date - 13/08/2025

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.

NEXT STEPS:

- The case officer will send you the credit screening approval certificate
- Once you have received this you can apply directly via this form: [Development Application in the Hampshire Avon Catchment](#)
- You will then be emailed directly when credits are available (expected 2 weeks)
- There is then the option of securing credits via a Section 111 form which will be sent to you.

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.

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).

CONDITIONS:

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

- Planning Layout. August 2023. Persimmon
- Detailed Landscape Proposals Plan GL2113 01F. April 2023. Golby and Luck
- Fencing and Enclosures. August 2023. Persimmon
- BNG Statement and Assessment. July 2024. GE Consulting
- Natural England Nutrient Calculator -Apartments
- Natural England Nutrient Calculator- Rogers Way- received by email 01/08/2025

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

2. 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).
 - f. Timeframe for provision of compliance report to the local planning authority; to be completed by the ecologist/ECoW and to include photographic evidence.

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.

3. Prior to the commencement of any works, including vegetation removal and demolition, details of the number, design and locations of bat roosts and nesting opportunities for birds (e.g. bat and bird boxes) shall be submitted to the local authority for approval. The approved details shall be implemented before occupation of the final works.

REASON: To provide mitigation /enhancement for biodiversity.

4. 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.

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

5. 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.

INFORMATIVES:

Nesting Birds

All British birds, their nests and eggs are protected under Section 1 of the Wildlife and Countryside Act 1981 (as amended) and the Countryside and Rights of Way Act 2000 while birds are nesting, building nests and sitting on eggs. The applicant is advised to check any structure or vegetation capable of supporting breeding birds and delay removing or altering such features until after young birds have fledged. Damage to extensive areas that could contain nests/breeding birds should be undertaken outside the breeding season. This season is usually taken to be the period between 1st March and 31st August but some species are known to breed outside these limits.

Reptiles

There is a residual risk that great reptiles could occur on the application site. These species are legally protected and planning permission does not provide a defence against prosecution. In order to minimise the risk of these species occurring on the site, the developer is advised to clear vegetation during the winter, remove all waste arising from such clearance and maintain vegetation as short as possible in line with the recommendations made in (insert details of ecological report). If these species are found during the works, the applicant is advised to stop work and follow advice from an independent ecologist or the Council Landscape and Design Team (ecologyconsultations@wiltshire.gov.uk)

River Avon SAC -Hampshire Catchment

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.

Final sign off – all matters addressed:

Ecologist Jenna Buss	Date 13/08/2025
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