

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	26/02/2026, 20/03/2026
Application number:	PL/2025/08963
Proposal:	Erection of two storeys to rear wing of approved care home to provide 4 new care bedrooms
Site address:	Breamar Lodge, 18-20 Stratford Road, Salisbury, SP1 3JH
Case officer:	Mary Rose Scott

Recommendations:

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

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date)
a)	Phosphorus neutrality	Habitat Regs	26/02/2026 -Evidence supporting inputted average occupancy rate -Clarification of SuDS, and updated nutrient budget as required	YES (20/03/2026) Amended nutrient budget and confirmation that applicant wishes to use council credit scheme
b)	Enhancements	CP50, NPPF	26/02/2026 -Amendment of plans to show specifications of proposed enhancement OR confirmation that a pre-commencement biodiversity enhancement condition will be used	YES (20/03/2026) Enhancement condition recommended (see end of document)

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 consulting Ecology. I have reviewed the application and supporting documents against OS Maps, aerial photography of the site and surrounding area, together with GIS layers of statutory and non-statutory designated sites and existing records of protected species.

Information considered:

- Proposed Site Plan, WLA, October 2025
- Existing Site Plan, WLA, October 2025
- Proposed Elevations Sheet 1, WLA, February 2026

- Preliminary Ecological Appraisal, Ecosupport, February 2026
- Ecological Briefing Note, Tyler Grange, April 2019
- Ecological Assessment, Tyler Grange, July 2022
- Small Sites Metric (Statutory Biodiversity Metric), Henrike Johannsen, October 2025
- [Natural England Nutrient Neutrality budget calculator for the River Avon SAC](#)

The site comprises a care home where it is proposed to add an extension of 4 bedrooms/units. The site is neighboured by a park to the northeast, athletics ground to the southwest and buildings in other directions.

[Thank you for re-consulting Ecology; my second comments are shown in blue.](#)

COMMENTS:

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. Many of the special features of the New Forest protected sites afforded protection are vulnerable to adverse effects associated with an increase in recreation as demonstrated in Natural England's supplementary advice issued for the SPA on 19 March 2019 and for the SAC on 18 March 2019.

A test of likely significance has been carried out by the relevant Competent Authority (Wiltshire Council). The proposal is not considered to comprise typical residential or tourism development, and no new dwellings are proposed. The addition of 4 units within an established care home – at the outer edge of the 13.8km zone – is not likely to result in significant additional recreational pressure on the protected sites. Overall, given the nature of the development, there is no mechanism for adverse effect, and the Habitat Regulation Assessment (HRA) has concluded that the application is not likely to have significant impacts on the New Forest SPA, New Forest SAC and New Forest Ramsar site, and the proposal is screened out of Appropriate Assessment. Wiltshire Council's "Interim recreation mitigation strategy for the New Forest internationally protected sites" (Version 1.1, 21 March 2023) therefore does not apply to this proposal.

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.

Thank you for providing a nutrient budget. However, the following issues were identified:

- The nutrient budget uses an average occupancy rate of 0.75. The Natural England nutrient budget calculator uses an average occupancy rate of 2.4 people per dwelling as standard. It is understood that the current proposal concerns individual units within a care home. However, insufficient evidence has been provided to support the use of a different rate (0.75). Please can the applicant provide such information?
- The budget includes SuDS comprising permeable paving to offset some of the nutrient burden. However, this is a continuation of the current situation, rather than a nutrient benefit from development by the incorporation of the SuDS. This section of the budget should therefore be left blank, unless it can be demonstrated that SuDS will be included within the development that serve as a betterment of the current scenario.

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.

Thank you for addressing the points above and amending the nutrient budget as appropriate. A statement has been provided which confirms that the occupancy of each unit is restricted to 1 resident, as per CQC registration; an average occupancy rate of 1 is therefore considered acceptable in the updated nutrient budget. The submitted nutrient calculation estimates a total phosphorus budget of 0.17 kg TP/year pre 2030 and 0.05 kg TP/year post 2030. 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 – Natural England Nutrient Neutrality budget calculator for the River Avon SAC, uploaded 04/03/2026
Approval of Nutrient Budget	Pre 2030 budget - 0.17 kg TP/year Budget approved - Yes Date - 20/03/2026

Council-issued phosphorus credits are expected to be available; however, to ensure that adequate mitigation is secured and deliverable for this development, the necessary credits must be secured as part of the permission.

Where Council mitigation is secured with the permission, 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.

In the absence of a legal agreement the mitigation fee and administration charge for the scheme can be paid by a section 111. The administration fee must be paid on the granting of permission, the mitigation fee is payable prior to commencement of development.

The cost of phosphorus credits from the Council's strategic scheme to mitigate the burden would be £7,225 (£42500 per 1 kg/TP) plus legal fees.

Where an applicant chooses to progress without securing mitigation at permission stage, nutrient neutrality must be secured, before any development can lawfully commence, via a planning obligation (Grampian condition or legal agreement).

Protected species

The habitats to be impacted by the works comprise newly planted ornamentals, hardstanding and the existing building. The building was assessed for its bat roosting potential, and found to have no suitable gaps, and no evidence of bats was found internally or externally. Overall, the building is considered to have negligible potential for roosting bats. The PEA's recommendation of sensitive lighting during construction should be adhered to.

The PEA also suggests the inclusion of an integrated bat brick. This enhancement is welcomed and is in line with CP50 and the NPFF. Whilst the bat brick is indicated on the Proposed Elevations Sheet, the specifications of the brick are not shown. Please could this plan be amended to include the design specifications of the bat brick, so that said plan is enforceable and can be included within a compliance condition? Alternatively, a pre-commencement enhancement condition can be applied. [The applicant has confirmed agreement to proceed with a pre-commencement enhancement condition.](#)

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).

A completed small sites statutory metric calculation confirming the baseline units of the site has been submitted. The pre-development (baseline) situation is summarised below.

On-site pre-development (baseline) biodiversity value	0.21 Habitat units
	0.00 Hedgerow units
	0.00 Watercourse units
Are there any irreplaceable habitats on-site?	No
Has any habitat degradation occurred?	No

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.

CONDITIONS:

1. Compliance with submitted documents

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

- Section 3 of the Ecological Assessment, Tyler Grange, July 2022
- Proposed Elevations Sheet 1, WLA, February 2026

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

2. Water Efficiency in Hampshire Avon and River Test Catchments

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

3. Biodiversity enhancements

Prior to the commencement of any works, including vegetation removal and demolition, details of the number, design and locations of opportunities for wildlife (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.

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.

And phosphorus mitigation (council credits) secured at permission.

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

Ecologist Abi Gazzard	Date 20/03/2026
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