

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	27/03/2026
Application number:	PL/2026/00829
Proposal:	Erection of two of semi-detached dwellings and associated garages following earlier demolition of existing dwelling
Site address:	5 Pretoria Road Ludgershall, SP11 9PB
Case officer:	Alex Edge

Recommendations:

☐	No Comment
☐	Support
☐	No objection
☒	Condition (no objection subject to conditions)
☐	Objection - further information required
☐	Objection in principle
☒	HRA required. Appropriate Assessment with a positive conclusion has been sent to Natural England, who must agree the conclusion (within 21 days) prior to the application being permitted.

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:

- Natural England Nutrient Neutrality budget calculator for the Solent Marine Sites
- Preliminary Ecological Appraisal, Arbtech, September 2025
- Biodiversity Net Gain Assessment, Arbtech, October 2025
- Statutory Biodiversity Metric, Zenobia – Jay Hatch, October 2025
- Proposed Plans & Elevations, 1532/02, October 2020
- Existing & Proposed Site Plan, 1532/01, October 2020

The site comprises a former detached dwelling (now demolished) proposed for replacement with two semi-detached dwellings. The site is surrounded by residential properties in all directions, with farmland ~130m east and south.

COMMENTS:

Salisbury Plain Special Protection Area (SPA) 6.4km buffer

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 January 2026 Natural England (NE) confirmed that the 2026 strategic AA for Salisbury Plain SPA continues to be supported by NE.

River Test catchment

This development falls within the River Test catchment which drains into the Solent. This region is protected by a number of international designations and the proposal has the potential for adverse effects alone or in combination to the Solent designated sites (Solent Maritime SAC, Solent and Southampton Water Special Protection Area (SPA)) with other developments through increased nitrogen in the catchment. 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.

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 in line with Natural England's advice. However, I have amended the number of additional dwellings from '2' to '1', given that 1 dwelling already existed on the site. As such, the development will result in a nitrogen burden of 3.41 kg/N/yr pre-2030, and mitigation is required.

Wiltshire Council has a strategic nitrogen mitigation scheme available to applicants located in the River Test catchment in Wiltshire. We can confirm that this option would be applicable for this proposal. The cost of Nitrogen credits from the Council's strategic scheme to mitigate the burden would be £9,513.90 (£2790 per 1 kg/N) plus legal fees.

The purchase of nitrogen credits prior to the commencement of development must be secured by planning obligations. Where a Section 106 agreement is not in place, mitigation can alternatively be secured under Section 111. In such cases, the credits must be purchased upon the granting of planning permission by completion of S111 process. The applicant should be directed to the Guidance Note for Completing Agreements Under S.111 of the Local Government Act 1972.

The AA concludes no adverse effects on the SAC site, subject to the contribution listed above. This AA has been sent to Natural England (30/03/2026) and the application must not be determined until they have agreed with the LPA's conclusion.

Should the developer wish to use the strategic scheme, please contact nutrientscheme@wiltshire.gov.uk for further information. Alternatively, a bespoke scheme of mitigation can be submitted provided this has been agreed with Natural England. Alternative strategic mitigation sites are available in the Solent. The latest information on mitigation options is available on the Partnership for South Hampshire website ([Potential Nutrient Mitigation Schemes - Partnership for South Hampshire](#)).

The developer may also wish to explore the potential use of SuDS in reducing the site's nutrient burden [NB. The SuDS would have to be a betterment of the existing situation. Currently, surface water infiltrates the grounds via permeable surfaces, thus, the addition of permeable SuDS surfaces (e.g., permeable paving) would not provide a betterment. An example of a betterment would include a retention pond or rain garden].

Protected species

The Preliminary Ecological Appraisal notes that the site formerly contained garden habitat, but that has been cleared and it now comprises ruderal habitat with one felled tree. The loss of the

tree could have resulted in a loss of bat roosting features. In line with the NPPF and CP50, as well as the report's recommendations, site enhancements should include new bat roosting provisions. The report also recommends the planting of fruit trees, a swift nest box and sparrow terrace, and mammal gaps under fencing. Currently, no biodiversity enhancements are shown on the plans. As such, a condition securing enhancements for wildlife should be applied.

It is considered that there is a low risk that reptiles or great crested newts could be present, and the precautionary measures detailed within the ecology report (including sensitive site clearance) must be adhered to.

Biodiversity Net Gain

Under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) this application is required to deliver 10% Biodiversity Net Gain (BNG). The Biodiversity Gain Plan condition will automatically apply if approval is forthcoming.

A statutory metric calculation, condition assessments and maps (*Biodiversity Net Gain Assessment, Arbtech, October 2025; Statutory Biodiversity Metric, Zenobia – Jay Hatch, October 2025*) detailing the baseline and predicted post-development biodiversity units of the site have been submitted and reports the following values:

On-site pre-development (baseline) biodiversity value	0.43 Habitat units
	0.00 Hedgerow units
	0.00 Watercourse units
Are there any irreplaceable habitats on-site?	No
Has any habitat degradation of occurred?	Yes – the site has been cleared between 2020-2024, so the baseline has been estimated using aerial imagery.

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.

The submitted metric indicates 0.44 biodiversity units are required to meet the 10% BNG requirement and that on-site BNG is not achievable. All land located outside the redline application boundary of the development site is considered off-site. All off-site biodiversity gains sites must be registered on the national biodiversity gains site register. Guidance on how to register a biodiversity gains site, and/or allocate off-site gains to your development (e.g., through the purchase of biodiversity units) can be found here: [Make off-site biodiversity gains as a developer - GOV.UK](#). In order for the Biodiversity Gain Plan condition to be discharged, all off-site gains must be shown on the Biodiversity Gain Plan as allocated to this development on the national biodiversity gains site register.

CONDITIONS:

1. Compliance with submitted documents

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

- Mitigation and enhancements detailed in the 'Preliminary Ecological Appraisal, Arbtech, September 2025'
- 'Biodiversity Net Gain Assessment, Arbtech, October 2025'

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

2. Ecological enhancements

Prior to the commencement of any works, including vegetation removal and demolition, details of the number, design and locations of ecological enhancements – such as opportunities for bats, nesting birds and invertebrates (e.g., bat and bird boxes; insect blocks) – 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.

3. Water Efficiency in 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

As well as planning obligation securing nitrogen mitigation/credits.

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

Ecologist	Date
Abi Gazzard	30/03/2026