

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	09/03/2026, 08/05/2026
Application number:	PL/2025/09697
Proposal:	Erection of a dwelling
Site address:	Birdbush Park, Ludwell, SP7 9HH
Case officer:	Joe Richardson

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	09/03/2026 -PTP specification -PIA certificate -Location plan of PTP	08/05/2026 YES -Natural England Nutrient Neutrality budget calculator for the River Avon SAC, uploaded 13/04/2026
b)	BNG	Environment Act 2021, Town and Country Planning Order 2015, CP50	09/03/2026 -Condition assessment sheets -Habitats map with correct redline boundary	08/05/2026 YES -Existing and proposed habitats maps, Arbtech, January 2026 -Condition assessment sheets

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:

- Preliminary Ecological Appraisal Report, Collington Winter Environmental, June 2025
- Natural England Nutrient Neutrality budget calculator for the River Avon SAC, [superseded with document uploaded 23/03/2026, and then 13/04/2026](#)

- Proposed elevations, block plan and location plan, 2671/3B
- Planning, Design and Access Statement, Lone Wolf Planning Ltd, undated
- Biodiversity Net Gain Statement, Lone Wolf Planning Ltd, undated
- Biodiversity Net Gain Report, Going Group, June 2025
- Statutory Biodiversity Metric, Somerled Mcdonald, January 2026
- [Existing and proposed habitats maps, Arbtech, January 2026](#)
- [Condition assessment sheets](#)

The site comprises a plot of grassland with an entrance driveway as well as individual trees where it is proposed to construct one dwelling. The site is neighboured by residential properties to the northeast, southeast and southwest, with further grassland to the northwest.

[Thank you for re-consulting Ecology; please see my further comments in blue.](#)

COMMENTS:

River Avon Special Area of Conservation (SAC) Hampshire Catchment

This development falls within the Hampshire 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 (AA) 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 budget has been submitted. 'Package Treatment Plant User Defined' has been selected for the wastewater treatment works, but details of the PTP, including a PIA certificate for the proposed PTP, have not been provided. **Further details of the proposed PTP (PIA certificate, specifications and location plan) must be submitted** to allow full assessment of the submitted budget.

[Thank you for submitting a revised budget, confirming connection to mains. Following further discussion regarding the inputted values/land use types, the finalised nutrient calculation estimates a total phosphorus budget of 0.11 kg TP/year pre 2030 and 0.02 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 13/04/2026
Approval of Nutrient Budget	Pre 2030 budget - 0.11 kg TP/year Budget approved - Yes

	Date - 08/05/2026
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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 £4,675 (£42,500 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).

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.*

Protected species and habitats

The site contains heavily managed grassland with a mix of native and non-native ornamental trees. None of the trees were found to have features potentially suitable for use by roosting bats. However, the site may support some foraging/commuting bats, with a hedgerow at the boundary (outside of the site ownership) and some trees within the plot. It is noted that there is currently no street lighting on the adjacent road, though the site may already be subject to a low level of urban light spill from the surrounding properties. Any new lighting must be wildlife-sensitive and avoid illuminating boundary features.

The trees may be used by nesting birds. The adults, young, eggs and nests of all species of birds are protected by the Wildlife and Countryside Act 1981 (as amended) while they are breeding. Please be advised that works should not take place that will harm nesting birds (such as vegetation clearance or building demolition) from March to August inclusive. 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.

There are no waterbodies within 250m of the site, and the short sward grassland is unlikely to offer any significant opportunities for amphibians or reptiles.

No signs of badgers were observed, though it is noted that there is a historical badger record <30m from the red line boundary, and the habitats in the wider area are suitable for use by badgers (arable). The ecology report details a number of precautionary measures for badgers that must be adhered to.

As recommended in the ecology report, biodiversity enhancements, such as bird and bat boxes, should be incorporated into the development, in line with the NPPF and CP50. This should be secured via a condition. Any new plantings should be designed to be wildlife-friendly and comprise of native species, and the site should continue to remain permeable to wildlife such as hedgehogs.

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 completed statutory metric calculation and statements (*Biodiversity Net Gain Statement, Lone Wolf Planning Ltd, undated; Biodiversity Net Gain Report, Going Group, June 2025; Statutory Biodiversity Metric, Somerled Mcdonald, January 2026*) have been submitted. It is noted that the BNG statement by Lone Wolf Planning Ltd refers to the site as being 'very small', and refers to the submission of a 'simplified' metric. However, the full statutory biodiversity metric calculation tool has been submitted rather than a small sites metric, and as such, is reviewed as follows:

The pre-development (baseline) values are summarised below.

On-site pre-development (baseline) biodiversity value	1.93 Habitat units
	0.00 Hedgerow units
	0.00 Watercourse units
Are there any irreplaceable habitats on-site?	No
Has any habitat degradation of occurred?	No

The following issue must be addressed in the baseline prior to determination:

- The **condition assessment sheets** for the baseline habitats have not been submitted. This information is required for review by the ecology team prior to determination.
- A **map/plan** showing a clear red-line boundary and on-site baseline habitats is required. This information is a minimum requirement set out in Article 7 of The Town and Country Planning (Development Management Procedure) (England) Order 2015. Whilst Appendix 7 of the ecology report includes a map, it currently does not cover the entire site; the redline application boundary and site boundary used for the BNG assessment must match.

Thank you for providing the above documents, which align with the submitted metric and provide sufficient supporting information for the baseline calculations. I am satisfied that the above concern has been addressed.

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. Further to some on-site BNG, the submitted metric indicates 0.25 biodiversity units or less will be required to meet the 10% BNG requirement. In these circumstances, statutory credits may be bought without providing evidence that insufficient off-site options are available in England. For further information please refer to guidance on Statutory Biodiversity Credits on the GOV.UK website (<https://www.gov.uk/guidance/statutory-biodiversity-credits>) under 'How to prove statutory credits are needed'.

~~IN SUMMARY: Insufficient information has been submitted. In carrying out its statutory function, the LPA must be reasonably sure that the proposal will not result in significant adverse effects on protected sites. The information outlined above must therefore be submitted and reviewed by the LPA's ecology team prior to determination of the application. I therefore maintain a holding objection until all the issues listed above have been suitably addressed.~~

CONDITIONS:

1. Compliance with submitted documents

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

- Section 4 (Mitigation) of Preliminary Ecological Appraisal Report, Collington Winter Environmental, June 2025
- Existing and proposed habitats maps, Arbtech, January 2026

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

2. Enhancements for Biodiversity

Prior to the commencement of any works, including vegetation removal and demolition, details of the number, design and locations of ecological enhancements – such as bird and bat 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.

3. 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

Informative – Artificial Lighting

The habitat within the proposed development site and the surrounding area is suitable for foraging and commuting bats. An increase in artificial lux levels can deter bats which could result in roost abandonment and/or the severance of key foraging areas. This will likely result in a

significant negative impact upon the health of bat populations across the region. Artificial light at night can have a substantial adverse effect on biodiversity. Any new lighting should be for the purposes for safe access and security and be in accordance with the appropriate Environmental Zone standards set out by the Institute of Lighting Engineers in their publication GN01:2021, 'Guidance for the Reduction of Obtrusive Light' (ILP, 2021), and Guidance note GN08-18 "Bats and artificial lighting in the UK", issued by the Bat Conservation Trust and Institution of Lighting Professionals.

Plus legal agreement securing phosphorus mitigation.

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

Ecologist Abi Gazzard	Date 08/05/2026
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