

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jenna Buss
Date:	18/05/2026
Application number:	PL/2026/00589
Proposal:	Hybrid application: full planning permission is sought for erection of a new detached classroom block to the northwest of the main school building; a weather protected link to the existing main building; a new artificial turf pitch with flood lights; and associated works required to expand the school from a 6FE to an 8FE school. Outline planning permission (for access, scale and layout, with all other matters reserved) for erection of a new detached classroom block on the existing car park; additional and replaced car parking areas; a new sports pitch; and associated works required to further expand the school from an 8FE to a 10FE school.
Site address:	Sarum Academy, Westwood Road, Bemerton Heath, Salisbury, SP2 9HS
Case officer:	Georgina Wright

Recommendations:

	No Comment
	Support
	No objection
	Condition (no objection subject to conditions)
x	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	Reptile Mitigation	C&W Act, CP50, NPPF	Detailed reptile mitigation strategy	
2	BNG Metric 10FE	Environment Act, CP50, Town and Country Planning	Resubmission of the 10FE and overall metrics with the baseline amended	

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:

- Ecological Appraisal. December 2025. The Landmark Practice
- Proposed Site Phasing Plan (Phase 1 and 2) ZZ-ZZ-DR-A-08-0008 PO2. January 2026. Footprint Architects
- Proposed Site Plan-Sheet 2 ZZ-ZZ-DR-A-08-0014 PO1
- BNG Strategy- Site Wide 75CC13-TLP-XX-XX-DR-L-1101. February 2026. The Landmark Practice
- Tree Protection Plan C042502.TPP. December 2025. Arbor-Call
- BNG Strategy-10FE 75CC13-TLP-XX-XX-DR-L-11003. November 2025. The Landmark Practice
- 8FE Tree Strategy Plan 75CC13-TLP-XX-XX-DR-L-30002. February 2026. The Landmark Practice
- BNG Strategy-8FE 75CC13-TLP-XX-XX-DR-L-1102. February 2026. The Landmark Practice
- Proposed Site Plan-Sheet 2 75CC13-FTP-ZZ-ZZ-DR-A 08-0014. February 2026. Footprint Architects
- Boundaries Plan 75CC13-TLP-XX-XX-DR-L-11004. January 2026. The Landmark Practice
- Proposed Site Overview (Phase 1 and 2) 75CC13-FTP-ZZ-ZZ-DR-A 08-0004. February 2026. Footprint Architect
- Existing Site Overview 75CC13-FTP-ZZ-ZZ-DR-A 08-0002. February 2026. Footprint Ecology
- Environmental Management Plan (EMP) Part 3. October 2023. Morgan Sindall
- Biodiversity Net Gain. December 2025. The Landmark Practice
- Statutory Biodiversity Metric 10FE. December 2025. TLP
- Statutory Biodiversity Metric 8FE. December 2025. TLP
- Statutory metric Entire Site. December 2025. TLP

Protected and Notable Species/Habitats

Reptiles

The application site was assessed as providing suitable habitat for commuting and hibernating common reptile species, particularly within the unmanaged scrub and tussocky grassland habitats located to the north, including the 10FE grassland. Common lizard (*Zootoca vivipara*) were recorded following mowing of the grassland to facilitate survey access.

It is also noted that the adjacent planning application (PL/2023/05287) identified significant populations of common lizard and slow worm (*Anguis fragilis*) within habitats directly adjoining the application site. A reptile translocation scheme is currently being implemented at that site to address the high population numbers recorded. This, in combination with the proposed development, has reduced the carrying capacity of the surrounding area.

Given that reptiles have been confirmed within the application site, and that adjoining habitats support locally significant populations, it is highly likely that the site itself supports a substantial population of common reptile species. However, no site-specific reptile surveys have been undertaken to robustly confirm population size or distribution. In light of the site's proximity to known populations and the presence of suitable habitat, a precautionary approach must be applied, and the site should be assumed to support a significant reptile population.

Whilst it is acknowledged that the proposals include measures to enhance edge habitats surrounding the playing fields, it is evident that a considerable proportion of habitat currently suitable for reptiles will be lost as a result of the development. Furthermore, there is potential for direct impacts on reptiles during construction, particularly in relation to the creation of the sports pitch and associated infrastructure.

In view of the above, a comprehensive Reptile Mitigation Strategy is required to accompany the application. The proposed development will result in a reduction in available habitat and overall carrying capacity, and it cannot be assumed that displacement into the wider landscape is feasible given the constraints posed by the adjacent site, which already supports significant reptile populations.

Accordingly, further ecological information is required at this stage to adequately assess impacts and to ensure that reptiles are appropriately safeguarded in accordance with relevant legislation and planning policy.

Bats

Two trees proposed for removal have been rated as PRF-I. Prior to removal, these trees will be subject to an updated roost assessment which will be detailed within the CEMP and secured by condition.

With regards to foraging and commuting bats, the existing complex is well lit and includes flood lighting on the existing sports pitch which is due to be upgraded as part of this proposal. This new lighting specification must be in accordance with the appropriate Environmental Zone standards set out by the Institution of Lighting Professionals (ILP) Guidance Notes on the Avoidance of Obtrusive Light (GN 01/2021) and Guidance note GN08/23 "Bats and artificial lighting at night", issued by the Bat Conservation Trust and Institution of Lighting Professionals.

The pitch at 10FE will not be lit which is welcomed. It is considered that although there will be a loss of current habitat to create the sports pitch, the proposed enhancements along the margins will ensure there is likely no significant impact on foraging and commuting bats as a result of the development.

No other protected or notable species or habitat were recorded on site, however a number of reasonable avoidance measures and precautionary working practices were outlined within the ecologist report which must be implemented within the CEMP which can 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.

A test of likely significance has been carried out by the relevant Competent Authority (Wiltshire Council) as required by Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended). This concluded that given the scale and nature of the development there is no mechanism for adverse effect. **The HRA has concluded that the application is not likely to have significant impacts on the SAC and subsequently the application is screened out of Appropriate Assessment**

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.

In view of the hybrid nature of this application with phased proposals, the Phase Biodiversity Gain Plan Form will be required to be submitted should permission be granted. Please see guidance [Phase gain plan form ODT.odt](#) for further information.

Completed statutory metric calculations confirming the baseline and predicted post- development biodiversity units of the site have been submitted for each phase as well as the overall net gain for the site;

1st Phase - 8FE Statutory Metric. December 2025. TLP demonstrates that a 10% gain can be achieved for both area and linear habitats.

2nd Phase-10FE Statutory metric. December 2025. TLP demonstrates that a 10% gain is likely to be achievable, please see further information required to assess the baseline below.

Overall Net Gain Statutory metric. December 2025. TLP demonstrates that a 10% gain is likely to be achievable, however this will require updating once the baseline in 10FE is amended, see comments below.

Information in the completed on-site baseline habitat tabs is accepted as accurate for the 8FE metric based on the information submitted. The pre-development (baseline) situation for phase 1 8FE is summarised below.

On-site pre-development (baseline) biodiversity value	12.73 Habitat units
	0.11 Hedgerow units
	Watercourse units
Are there any habitats on-site?	No
Has any habitat degradation occurred?	No

For the whole site metric and 10FE the baseline is not currently acceptable. The following issues must be addressed in the baseline prior to determination:

there are a number of errors that will require amendment prior to determination in 10FE which will also impact the Overall Net Gain calculation as identified below:

- The submitted 10FE metric is currently incomplete, with the baseline showing a metric error where no area has been stipulated for the urban trees in cell H20;
- The broad assessment of modified grassland for the 10FE grassland area requires justification. The area does not appear to be managed and could meet the requirements of other neutral grassland. We would advise that this is reviewed and quadrat data supplied together with a species list for the site with full justification for the current UK Hab definition.
- There are net losses of Medium distinctiveness *area habitats* in 1 broad habitat group, and too few gains at higher distinctiveness categories to offset these losses. The broad habitat group concerned is:
 - Woodland and forest, which loses 0.00099 BU, from “Woodland and forest - Other woodland; broadleaved” (0.15 BU pre-intervention, and 0.15 BU post-intervention, so a loss of 0.00099 BU)

Once the amendments within 10FE and the overall site metric have been completed. It should be noted that permission must secure the phasing of the proposed works as outlined within the hybrid application with the phased Biodiversity Gain Plan submitted for each phase.

The proposed BNG is considered 'significant' due to:

- the scale and nature of the application (major);
- units required (3.51 units), and
- the BNG proposed (including medium and high distinctiveness habitats of other neutral grassland and traditional orchards).

A Habitat Management and Monitoring Plan (HMMP) will be required, and should be secured via condition should permission be granted.

In order for the council to fulfil its BNG monitoring responsibilities, a Biodiversity Net Gain On-site 30 year Monitoring Fee must be secured through a Section 111, Section 106 or Unilateral Undertaking at the time of permission with contributions secured prior to commencement. The applicant should be directed to the Guidance Note for Completing Agreements Under S.111 of the Local Government Act 1972. Where the applicant elects to use the S111 process the fee must be paid and S111 signed by both the applicant and the council on the granting of planning permission.

In order for the council to fulfil its monitoring obligations, the BNG monitoring fee would be £6,200 plus legal fees payable on commencement of development.

DRAFT CONDITIONS:

The following conditions are likely to be required to support this application once the additional information above has been submitted in support of the application. The following are not exhaustive and are dependent on the additional information provided.

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

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

2.No development shall commence on site until a Habitat Management and Monitoring Plan (the HMMP), prepared in accordance with the statutory Biodiversity Gain Plan and including:

- a non-technical summary;
- the roles and responsibilities of the people or organisation(s) delivering the HMMP;
- the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the statutory Biodiversity Gain Plan and schedule for implementation;
- the management measures to maintain habitat in accordance with the statutory Biodiversity Gain Plan for a period of 30 years from the completion of development; and
- the monitoring methodology and specification of a Monitoring Pack (to include but not exclusively up to date Management Actions Logs, Habitat Condition Assessment Reports, metric calculation; and corresponding post intervention Habitat Map) which shall be submitted to the Local Planning Authority in years 2 (two) 5 (five) 10 (ten) 15 (fifteen) 20 (twenty) and 30 (thirty) of the Maintenance Period,

has been submitted to, and approved in writing by, the local planning authority.

The created and/or enhanced habitat shall be managed and maintained in accordance with the statutory HMMP at all times thereafter.

REASON: To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990.

3. 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.

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.

Final sign off – all matters addressed:

Ecologist Jenna Buss	Date
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