

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	03/06/2026
Application number:	PL/2026/02268
Proposal:	Erection of two detached dwellings with new access and associated works
Site address:	Land West of North Lodge, 128 High Street, Codford St Peter, BA12 0NJ
Case officer:	Jemma Foster

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)	No net loss of local biodiversity resource and ecological networks	CP50, NPPF, Habs Regs	03/06/2026 -Compensatory measures for the loss of priority habitat	
b)	Protected species – bats	CP50, NPPF, Habs Regs	03/06/2026 -Confirmation of lighting plans (if any) and need for bat activity surveys	
c)	BNG	Environment Act 2021, Town and Country Planning Order 2015, CP50	03/06/2026 -Clarification of pre-degradation habitat condition	

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:

- Design and Access Statement, April 2026, Rev C
- Existing Site Plan, GBL, January 2023
- Proposed Site Plan, GBL, January 2023, Rev G (April 2026)

- Update Preliminary Ecological Appraisal, Seasons Ecology, November 2025
- Construction Environmental Management Plan, Seasons Ecology, March 2026
- Biodiversity Enhancement Plan, Seasons Ecology, March 2026
- Natural England Nutrient Neutrality budget calculator for the River Avon SAC
- Nutrient Neutrality Assessment and Mitigation Strategy, SWEL, July 2025
- Statutory Biodiversity Metric, Harley Evenett, March 2026
- Baseline BNG Habitat Plan and Post-development BNG Habitat Plan
- Biodiversity Net Gain Statement, Seasons Ecology, March 2026

The site comprises a plot of land with tall ruderals, trees, shrubs and brash piles. It is proposed to construct two detached dwellings. Similar applications were previously withdrawn (PL/2023/07301 and PL/2024/08861) for drainage related reasons, though there were ecology objections outstanding (relating to ecological survey, lighting and nutrient mitigation). The plot immediately to the northwest has permission for the construction of one dwelling (PL/2021/10103) and, as with the current site, is within an area of deciduous woodland priority habitat.

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 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 and assessment have been submitted, as well as details of the proposed PTP and drainage field. Please note that the site falls within a Nitrate Vulnerable Zone and should have been marked as such in the calculator. However, this change would not alter the final nutrient budget calculation. The submitted nutrient calculation estimates a total phosphorus budget of 0.30 kg TP/year. 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 07/04/2026
Approval of Nutrient Budget	Budget - 0.30 kg TP/year
	Budget approved - Yes
	Date - 28/05/2026

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 £12,750 (£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).

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 and notable species and habitats

Habitats

Preliminary ecological appraisals were conducted in June 2024 and November 2025. The site is dominated by tall herbs and ruderals, with scattered trees primarily along the boundaries.

The site lies within an area listed as deciduous woodland priority habitat on Natural England's Priority Habitat Inventory. Whilst the ecology report notes that the site is not currently wooded, the arboricultural report and photographs make clear that the site has been cleared and a number of trees have been felled. The BNG baseline map notes that woodland was cleared in 2022 and 2023.

Paragraph 192 of the NPPF states that plans should:

"promote the conservation, restoration and enhancement of priority habitats".

Wiltshire's CP50 states:

"Development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value"

Compensatory woodland/tree planting would be expected for development involving the clearance of deciduous woodland priority habitat. With the previous applications (PL/2023/07301 and PL/2024/08861), at least 14 further trees were shown as retained on the proposed site plan. It is unclear why these trees have since been removed from the plans/felled. **The plans should be amended to include compensatory measures for the loss of priority habitat.**

Bats

The updated preliminary ecological appraisal reports no potential roosting features. The site, however, does offer foraging and commuting opportunities, and may have previously offered roosting opportunities within the now-cleared wooded area/s. As the plot is currently unlit and falls within a parcel of deciduous woodland priority habitat, the ecology report recognises that bat activity surveys may be necessary. **Please could the applicant therefore confirm whether any new external lighting is proposed, and if so, what the lighting plans entail, and whether any bat surveys have been/will be undertaken?**

The Biodiversity Enhancement Plan report's recommendation of integrated bat boxes is welcomed and is in line with CP50. **Said report should be secured via a compliance condition.** However, as above, compensatory planting for the loss of priority habitat should also be incorporated into the development, and the Biodiversity Enhancement Plan may require updating.

Nesting birds

The site contains habitats suitable for use 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. Structures or vegetation capable of supporting breeding birds should be checked prior to commencement, and any removal or altering of such features should be delayed until after young birds have fledged.

Reptiles and amphibians

There is one pond present within 500m of the site. This pond is 270m to the southwest and was found to have "average" suitability for great crested newts (GCN). However, this pond is

separated from the site via a major road (A36). It is thus considered unlikely that the works will adversely affect GCN, though **the precautionary measures outlined in Section 6.4 of the ecology report as well as the Construction Environmental Management Plan must be adhered to as per a compliance 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 statutory metric calculation, condition assessments and maps ('*Statutory Biodiversity Metric, Harley Evenett, March 2026*'; '*Baseline BNG Habitat Plan and Post-development BNG Habitat Plan*'; '*Biodiversity Net Gain Statement, Seasons Ecology, March 2026*') confirming the baseline and predicted post-development biodiversity units of the site have been submitted.

The pre-development (baseline) situation is summarised below.

On-site pre-development (baseline) biodiversity value	0.57 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 – woodland was cleared in 2022 and 2023. It is unclear whether the habitat condition is taken as pre-degradation.

The on-site pre-development habitat is logged as woodland. However, it is unclear whether its condition – listed as poor – has considered the 'pre-degradation' state of the woodland. Table 1 of the BNG Statement appears to refer to the condition criteria in relation to the current status of the site (e.g., with reference to the age distribution criterion, "*the woodland **now** presents only young shrub*"). Where there is insufficient evidence about the biodiversity value of the onsite habitat immediately before the degradation, the pre-development biodiversity value of the onsite habitat must be taken to be the highest biodiversity value of the habitat which is reasonably supported by any available evidence relating to it. **As such, clarification is required with regard to the condition entered for the woodland unit.**

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 or priority habitats or species. The information outlined above must therefore be submitted and reviewed by the LPA's ecology team prior to determination of the application. I maintain a holding objection until all the issues listed above have been suitably addressed.

CONDITIONS: wording to be provided once above issues addressed

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

Ecologist	Date
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