

Date: 04 June 2026
Our ref: 540761
Your ref: PL/2026/00589



Georgina Wright
Case Officer
Wiltshire Council

Customer Services
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BY EMAIL ONLY

Dear Ms Wright,

Planning consultation: 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 additional car parking area; a new sports pitch; and associated works required to facilitate further expansion of the school from an 8FE to a 10FE school.

Location: Sarum Academy, Westwood Road, Bemerton Heath, Salisbury, SP2 9HS

Thank you for your consultation on the above dated 26 March 2026.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Protected Species – Bats

It is noted that although the Ecology Appraisal recognises that Annex II bats are present in the landscape, no bat activity surveys have been provided. We agree that Annex II species are likely to be present and in the absence of bat surveys the mitigation measures should apply the precautionary principle to ensure the scheme maintains and enhances the commuting corridors and foraging opportunities of the site.

Further, in relation to the two trees with roosting potential proposed for removal, we agree with the county ecologist that these trees should be assessed by a qualified ecologist prior to felling.

Protected Species – Reptiles

The habitats on site have been assessed to be suitable for common reptiles, including slow worm and common lizard. Despite no on site reptile surveys, the submitted documents state that the existing habitats and proposed enhancements provide sufficient capacity for reptiles. It is noted that significant populations of slow worms and common lizards were identified in the planning application to the north (PL/2023/05287) and that mitigation included translocation. Therefore, it is our view that the abundance of suitable habitat for reptiles in this locality has been reduced and that the proposals will reduce the carrying capacity further.

Therefore, further information is required to assess the impacts of the proposals on protected reptile species. We agree that reptiles are present on site and in the absence of reptile surveys a precautionary approach should be taken to mitigation. In order to assess the impacts of the proposals on reptiles a mitigation strategy should be provided and agreed with your authority's ecology team to ensure the legal protection of reptiles.

Other Protected Species

Natural England has produced [standing advice](https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals)¹ to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. The final protected species mitigation strategy should be agreed by your Authority's Ecology Team.

Lighting Strategy

Any permission should ensure construction lighting is avoided and that any necessary lighting during the operational phase does not increase light spill on core bat habitat. Your authority should be satisfied that the sports pitch to be upgraded at 8FE does not increase light spill when compared with the existing scenario. We recommend that this is clearly demonstrated by the submission of lux contour plans for the existing and proposed scenarios. We note and welcome that the proposed sports pitch at 10FE is not to be lit.

Landscape and Ecological Management Plan (LEMP)

The scheme provides for the retention and enhancement of habitats the details of which will need to be set out in a LEMP, which should be agreed by your Authority prior to commencement of the scheme.

Construction Environmental Management Plan (CEMP)

A CEMP for the scheme to avoid and mitigate effects on ecological features should be agreed by your Authority prior to commencement of the scheme. The CEMP should detail how hedgerows, trees and woodland will be protected and how dust will be controlled during construction.

Should the developer wish to discuss any of the above with Natural England, we recommend that they seek advice through our Discretionary Advice Service.

Should the proposal change, please consult us again.

If you have any queries relating to the advice in this letter please contact me directly.

Yours faithfully,

Kyle Conroy
Sustainable Development Higher Officer
Wessex Area Team

¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

Annex A – Additional advice

Natural England offers the following additional advice:

Wider landscapes

Paragraph 187 of the NPPF highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry-stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape and Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Guidelines for Landscape and Visual Impact Assessment \(GLVIA3\) - Landscape Institute](#) for further guidance.

Biodiversity duty

Section 40 of the [Natural Environment and Rural Communities Act 2006 \(legislation.gov.uk\)](#) places a duty on the local planning authority to conserve and enhance biodiversity as part of its decision making. We refer you to the [Complying with the biodiversity duty - GOV.UK \(www.gov.uk\)](#) for further information.

Designated nature conservation sites

Paragraphs 193-195 of the NPPF set out the principles for determining applications impacting on Sites of Special Scientific Interest (SSSI) and habitats sites (Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Both the direct and indirect impacts of the development should be considered. A Habitats Regulations Assessment is needed where a proposal might affect a habitat site (see [Habitats regulations assessments: protecting a European site - GOV.UK \(www.gov.uk\)](#) and Natural England must be consulted on 'appropriate assessments' (see [Appropriate assessment - GOV.UK \(www.gov.uk\)](#) for more information for planning authorities).

Natural England must also be consulted where development is in or likely to affect a SSSI and provides advice on potential impacts on SSSIs either via the [SSSI Impact Risk Zones \(England\) \(arcgis.com\)](#) or as standard or bespoke consultation responses. Section 28G of the Wildlife and Countryside Act 1981 places a duty on all public bodies to take reasonable steps, consistent with the proper exercise of their functions, to further the conservation and enhancement of the features for which an SSSI has been notified ([Sites of special scientific interest: public body responsibilities - GOV.UK \(www.gov.uk\)](#)).

Protected Species

Natural England has produced [Protected species and development: advice for local planning authorities \(gov.uk\)](#) (standing advice) to help planning authorities understand the impact of particular developments on protected species.

Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances. A protected species licence may be required in certain cases. We refer you to [Wildlife licences: when you need to apply - GOV.UK \(www.gov.uk\)](#) for more information.

Local sites and priority habitats and species

The local planning authority should consider the impacts of the proposed development on any local wildlife or geodiversity site, in line with paragraphs 187, 188 and 192 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity to help nature's recovery. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local environmental records centre, wildlife trust, geoconservation groups or recording societies. Emerging [Local nature recovery strategies - GOV.UK \(www.gov.uk\)](#) may also provide further useful information.

Those habitats and species which are of particular importance for nature conservation are included as 'priority habitats and species' in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of

Special Scientific Interest on the Magic website or as Local Wildlife Sites. We refer you to [Habitats and species of principal importance in England - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/habitats-and-species-of-principal-importance-in-england) for a list of priority habitats and species in England. You should consider priority habitats and species when applying your 'biodiversity duty' to your policy or decision making

Natural England does not routinely hold priority species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. We refer you to the [Brownfield Hub - Buglife](https://www.brownfieldhub.org.uk/) for more information and Natural England's [Open Mosaic Habitat \(Draft\) - data.gov.uk](https://data.gov.uk/dataset/open-mosaic-habitat-inventory) (Open Mosaic Habitat inventory), which can be used as the starting point for detailed brownfield land assessments.

Biodiversity and wider environmental gains

Development should provide net gains for biodiversity in line with the NPPF paragraphs 187(d), 192 and 193. Major development (defined in the [National Planning Policy Framework \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/115122/nppf-2019.pdf) glossary) is required by law to deliver a biodiversity gain of at least 10% from 12 February 2024 and this requirement was extended to smaller scale development in Spring 2024. For nationally significant infrastructure projects (NSIPs), it is anticipated that the requirement for biodiversity net gain will be implemented from 2026.

For further information on the timetable for mandatory biodiversity net gain, we refer you to [Biodiversity Net Gain moves step closer with timetable set out - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/biodiversity-net-gain-moves-step-closer-with-timetable-set-out). [Biodiversity net gain - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/biodiversity-net-gain) provides more information on biodiversity net gain and includes a link to the draft [Biodiversity net gain - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/biodiversity-net-gain) Planning Practice Guidance.

The statutory biodiversity metric should be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. We refer you to [Calculate biodiversity value with the statutory biodiversity metric - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/calculate-biodiversity-value-with-the-statutory-biodiversity-metric) for more information. For small development sites, [The Small Sites Metric - JP040 \(naturalengland.org.uk\)](https://naturalengland.org.uk/jp040) may be used. This is a simplified version of the statutory biodiversity metric and is designed for use where certain criteria are met.

The mitigation hierarchy as set out in paragraph 193 of the NPPF should be followed to firstly consider what existing habitats within the site can be retained or enhanced. Where on-site measures are not possible, provision off-site will need to be considered.

Where off-site delivery of biodiversity gain is proposed on a special site designated for nature (e.g. a SSSI or habitats site) prior consent or assent may be required from Natural England. More information is available on [Sites of Special Scientific Interest: managing your land](https://naturalengland.org.uk/jp038)

Development also provides opportunities to secure wider biodiversity enhancements and environmental gains, as outlined in the NPPF (paragraphs 8, 77, 109, 125, 187, 188 and 193). Opportunities for enhancement might include incorporating features to support specific species within the design of new buildings such as swift or bat boxes or designing lighting to encourage wildlife.

[The Environmental Benefits from Nature Tool - Beta Test Version - JP038 \(naturalengland.org.uk\)](https://naturalengland.org.uk/jp038) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory biodiversity metric.

[Natural environment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/natural-environment) provides further information on biodiversity net gain, the mitigation hierarchy and wider environmental net gain.