

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jessica Cracknell
Date:	06/07/2026
Application Number:	PL/2026/02709
Proposal:	Conversion and change of use of existing building to facilitate the provision of two (Use Class C3) residential units, and the demolition of existing building and erection of one (Use Class C3) residential dwelling with associated works
Site Address:	47 Blue Boar Row, Salisbury, SP1 1DA
Case Officer:	Joe Richardson

Recommendations:

☐	No Comment
☐	Support
☐	No objection
☐	Condition (no objection subject to conditions)
☒	Objection - further information required
☐	Objection in principle
☒	HRA.

An Appropriate Assessment for impacts on the New Forest Protected Sites has been completed and sent to Natural England for their agreement that the HRA can be favourably concluded. There is a statutory 21-day response window. The application must not be approved until NE have endorsed the conclusion of the AA.

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date submitted)
1	Ecological Impact Assessment (EcIA): Protected Species	NPPF, CP50, Habs Regs	06/07/2026 PEA submitted was undertaken in July 2024 and is considered to be out of date. An updated PEA/Ecological Assessment must be undertaken to determine potential impacts on the habitats and protected species within the site boundary.	NO

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 your consultation on the above application. I have reviewed the submitted documents against OS maps, aerial photographs of the site and surrounding area, together with GIS layers of statutory and non-statutory designated sites and existing records of protected species.

The following submitted documentation was reviewed to inform this response:

- Natural England Nutrient Neutrality budget calculator for the River Avon SAC;
- Ecological Impact Assessment. 03 February 2025. HalpinRobbins. Report Ref. 01/054/007/01_EclA;
- Proposed Floor Plans. May 2025. Planning & Design. Drawing No. 1628/01. Rev. E;
- Proposed Phase 2 Elevations. March 2026. Planning & Design. Drawing No. 1628/02. Rev. B;
- Planning Statement. April 2026. Atlas Planning Group;
- Outline Ground Floor Plan (Part 1). 09 April 2025. Land & Building Surveyors. Drawing No. LDS/18677 FP1. Rev. C;
- Outline Ground Floor Plan (Part 2). 09 April 2025. Land & Building Surveyors. Drawing No. LDS/18677 FP2. Rev. C;
- Outline First Floor Plan (Part 1). 09 April 2025. Land & Building Surveyors. Drawing No. LDS/18677 FP3. Rev. C;
- Outline First Floor Plan (Part 2). 09 April 2025. Land & Building Surveyors. Drawing No. LDS/18677 FP4. Rev. C;
- Outline Second Floor Plan. 09 April 2025. Land & Building Surveyors. Drawing No. LDS/18677 FP5. Rev. C;
- External Elevations. 09 April 2025. Land & Building Surveyors. Drawing No. LDS/18677 EL1. Rev. C;
- External Elevations & Cross Sections. 09 April 2025. Land & Building Surveyors. Drawing No. LDS/18677 EL2. Rev. C;
- External Elevations & Cross Sections. 09 April 2025. Land & Building Surveyors. Drawing No. LDS/18677 EL3. Rev. C.

New Forest Protected Sites

The proposed development site lies within the 13.8km zone of influence for the New Forest internationally protected sites, which comprises the New Forest SPA, New Forest SAC and New Forest Ramsar site. Therefore, the application is screened into appropriate assessment under the Conservation of Habitats and Species Regulations 2017 (as amended) on account of its potential to cause adverse effects on the New Forest protected sites through increased recreational pressure which may occur alone and in-combination with other plans and projects.

In line with the Councils Interim Mitigation Strategy, the applicant has agreed to pay the SAMM payment requirements of £660 per dwelling/tourism unit (plus legal and admin fees). This will be secured via a S111 agreement at determination. Unilateral undertakings or s106 agreements are also available to ensure the necessary mitigation is secured.

This will enable the Council to conclude, subject to endorsement from Natural England, that the development proposed by means of this application will not lead to significant adverse effects on the New Forest protected sites alone or in-combination with other plans and projects.

The cost of developer contributions to mitigate the burden would be £1,980 plus legal and admin fees.

The applicant should be directed to the Guidance Note for Completing Agreements Under S111 of the Local Government Act 1972.

It is considered that this approach delivers the required level of certainty to secure effective mitigation for the recreational burdens of this planning application. There will be no in combination effects with other developments, therefore we can conclude that there would be no adverse effect on the integrity of the above European Sites as a result of the development.

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.

The submitted nutrient calculation calculated a total phosphorus budget of 0.36 kg TP/year pre 2030 and 0.11 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 – 06/07/2026
Approval of Nutrient Budget	Pre 2030 budget - 0.36 kg TP/year
	Budget approved - Yes
	Date - 06/07/2026

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.

The application must not be positively determined until the P-credits have been secured. 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 £ 15,300 (£42500 per 1 kg/TP) plus legal and admin fees.

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

The application is supported by an Ecological Impact Assessment (Assessment (03 February 2025. HalpinRobbins. Report Ref. 01/054/007/01_EcIA). The assessment is based on an Ecological Building Survey undertaken on 31 July 2024 and the report was updated to reflect changes to the proposed development.

The submitted Ecological Impact Assessment (EcIA) includes the following validity statement: *"Reports are generally valid between 12–18 months, reports between 18 months and 3 years will require an updated site walkover to see if anything has changed which may require updating survey(s). Reports more than 3 years old are unlikely to still be valid and surveys are likely to need updating."* Given that the ecological survey work was undertaken in July 2024 and more than 18 months had lapsed at the time the current application was submitted, the survey information falls outside the report's stated 12–18 month validity period. As per CIEEM's (Chartered Institute of Ecology and Environmental Management) Advice Note ([Advice-Note.pdf](#)) referred to in the Government's standing advice on protected species and development, if data was collected over 18 months ago, the results can be considered to be no longer be valid. In accordance with the

recommendations contained within the EclA, and CIEEM's guidance note, an updated site walkover is required to establish whether site conditions have changed. In carrying out its statutory function, the LPA must be reasonably sure that the proposal will not result in significant adverse effects on protected habitats or species. The updated survey work must be completed and submitted for review by the LPA's ecology team prior to determination. The results should confirm the current status of the site and may necessitate revisions to the proposed mitigation and enhancement measures, which must be updated and secured accordingly. I therefore maintain a holding objection until all the issues listed above have been suitably addressed.

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). Based on the information available the biodiversity gain planning condition is not considered to apply to this application as the development meets the following criteria and is therefore below the de minimis threshold, meaning the development:

- does not impact an onsite priority habitat (a habitat specified in a list published under section 41 of the Natural Environment and Rural Communities Act 2006); and
- impacts less than 25 square metres of onsite habitat that has biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat (as defined in the statutory metric).

Note to case officer: you should be satisfied that the proposals meet the above criteria and act accordingly. Further information will be required from the applicant prior to determination in the event the application is considered to be subject to mandatory biodiversity net gain.

Core Policy 50

Core Policy 50 of the Wiltshire Core Strategy requires all development to demonstrate no net loss of biodiversity and to seek opportunities to enhance biodiversity. The NPPF also encourages applications to deliver measurable net gains (para 186 d). It is anticipated that all developments will deliver no net loss of biodiversity. For this application, biodiversity measures should focus on delivering continued ecological functionality for birds, bats and hedgehogs.

The Ecological Impact Assessment recommends the inclusion of bee bricks/planters and universal swift bricks. All details on exact locations and specifications must be added to all working plans (see condition below) and will become an enforceable part of the planning permission to avoid oversight and to ensure consistency and enforceability. Integrated features are generally maintenance-free and seek to benefit a target species/s or group/s and should demonstrate viability in terms of position on the building, location and clustering in accordance with relevant guidance and the additional features.

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 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 therefore maintain a holding objection until all the issues listed above have been suitably addressed.

CONDITIONS: these will be added once the issues above have been addressed

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

Ecologist	Date
Jessica Cracknell	