

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jenna Buss
Date:	07/07/2026
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)
☐	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	Yes Reptile Mitigation Strategy
	BNG Metric 10FE	Environment Act, CP50, Town and Country Planning	Resubmission of the 10FE metric with the baseline amended	Yes Updated 10FE Metric

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

Updated Documentation Submitted and Reviewed

- Ecological Appraisal. May 2026. The Landmark Practice
- Reptile Mitigation Strategy. June 2026. The Landmark Practice
- Sarum Academy-Muga 6 masts option D93234 Rev B. January 2026. Kingfisher Sport
- Ecology Note. June 2026. The Landmark Practice
- Bat Box and Bee Brick suggested locations. April 2026. Footprint Architects
- Proposed Site Overview 75CC13-FTP-ZZ-ZZ-DR-A-08-0003 P05. May 2026. Footprint Architects
- Proposed Site Overview 75CC13-FTP-ZZ-ZZ-DR-A 08-0005 P04. May 2026. Footprint Architects
- Proposed Site Plan 75CC13-FTP-ZZ-ZZ-DR-A 08-0007 P04. May 2026. Footprint Ecology.
- Habitat Management and monitoring Plan. May 2026. The Landmark Practice
- Construction Environment Management Plan SE PLN 01. October 2023. Morgan Sindall
- CEMP B. December 2025. The Landmark Practice
- Statutory Biodiversity Metric 8FE. June 2026. The Landmark Practice
- Statutory Biodiversity Metric 10FE. June 2026. The Landmark Practice
- Statutory Biodiversity Metric While Site Metric. June 2026. The Landmark Practice

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 10FE 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.

Section 5.49 of the updated ecology survey states that '*it is unlikely that any population of reptile present on site would be significant enough in population size or density to be of Significant ecological value*'. However, significant populations of reptiles exist directly adjacent with suitable habitat connectivity to allow for movement of reptiles into the 10FE area. We therefore do not accept this assessment. Although the Reptile Mitigation Strategy suggests that reptile fencing is in place, reducing movement onto site, this has been inconsistently managed providing frequent opportunity for reptiles to disperse.

It is therefore anticipated that reptiles will represent a significant constraint to the 10FE phase of the development. Whilst we welcome the submission of the Reptile Mitigation Strategy, this and the proposed plans for 10FE should not be approved at this time. Reptile surveys will be required to inform the development as the results of these surveys will likely influence the final design.

The parcel of land proposed for 10FE will need to be secured to ensure no works are carried out on site, including routine management works until such a time that a reptile survey and mitigation strategy are submitted to and agreed by the LPA.

The delay in the 10FE development is noted. The reptile surveys should therefore be secured within the reserved matters for this proposal. The surveys will be required to establish population estimates within this area as part of the reserved matters and a full mitigation strategy submitted and agreed with the LPA prior to commencement of any works for phase 10FE.

Bats

Roosting

The updated Ecological Appraisal states that prior to their removal, all trees will be subject to an updated preliminary roosts assessment which will be included within the CEMP as outlined in 5.19 of CEMP B which is welcomed.

In addition, the two trees assigned PRF-1 will be subject to soft felling techniques under the supervision of a suitably qualified ecologist.

A building proposed for demolition supported potential roost features for bats. One emergence survey was undertaken in May 2026. No evidence of bats roosting within the building was identified and no bats were seen to emerge during the survey. This building has been scoped out of further consideration for roosting bats.

From aerial photographs it is evident that buildings existed at the location of the proposed science block. These buildings were not included in any ecology assessment, particularly in relation to bat roosting potential. From the recent 2026 aerial imagery, these buildings appear to have been removed. It is unclear when these buildings were removed or if they held potential to support roosting bats.

It is noted that bat boxes will be included in the new science building on site which is welcomed and should be secured with the permission.

Foraging/Commuting

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.

Lighting proposals are detailed within Sarum Academy-Muga 6 masts option D93234 Rev B. January 2026. Kingfisher Sport, which demonstrate significant light spill into the adjacent habitat directly north and along the western boundary. It is unclear to what extent this differs to the existing, however light spill into the northern parcel also occurs. It is unclear how this proposed lighting scheme follows best practice in regards to Guidance note GN08/23. Insufficient information to demonstrate that *implementation of a sensitive lighting scheme along commuting / boundary features to minimise impacts resulting from artificial lighting, based best practice guidance (ILP/BCT, 2023)* as outlined within the ecology report has been implemented.

No other protected or notable species or habitat were recorded on site, however a number of reasonable avoidance measures and precautionary working practices are included within the CEMP B which are welcomed. An updated CEMP would be required for future development within the 10FE.

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, [the Phased Biodiversity Gain Plan Forms have been submitted for the two phases which is welcomed.](#)

[Updated 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. June 2026. TLP demonstrates that a 10% gain will not be achieved for area habitats with a unit deficit of 0.32.](#)

On-site pre-development (baseline) biodiversity value	14.76 Habitat units
	0.11 Hedgerow units
	0.00 Watercourse units
Are there any irreplaceable habitats on-site?	No
Has any habitat <u>degradation</u> of occurred?	Unknown – removal of existing buildings may not be considered degradation if only undertaken on existing hard standing.

[2nd Phase-10FE Statutory metric. June 2026. TLP demonstrates that a 10% gain is likely to be achievable. However, this is likely to change to reflect the mitigation strategy required for reptiles.](#)

On-site pre-development (baseline) biodiversity value	6.74 Habitat units
	0.00 Hedgerow units
	0.00 Watercourse units

Are there any irreplaceable habitats on-site?	No
Has any habitat <u>degradation</u> of occurred?	No

The whole site metric, June 2026. TLP demonstrates that a 10% gain is likely to be achievable. However, this will require updating once the proposals in 10FE are amended post surveys.

On-site pre-development (baseline) biodiversity value	21.49 Habitat units
	0.11 Hedgerow units
	0.00 Watercourse units
Are there any irreplaceable habitats on-site?	No
Has any habitat <u>degradation</u> of occurred?	No

Although the 8FE metric does not demonstrate a 10% gain and therefore phase 1 will not meet BNG requirements, the overall site metric confirms the required net gain can be achieved.

The scheme design may change in light of the reptile survey results, however, it is anticipated that 10% net gain in area habitat will still be achievable and overall gain across the phases can be achieved. If phase 2 should not progress, the BNG shortfall within 8FE will be required to be met, this must be included within the HMMP.

A Habitat Management and Monitoring Plan (HMMP) has been submitted in support of this application. However, it currently includes both 8FE and 10FE phases. At present due to the consideration of reptiles within the 10FE proposal, the LPA cannot secure the HMMP for both phases at this time. A separate HMMP for each phase will be required to secure management of the 8FE and 10FE phase independently.

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.

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:
 - Bat Box and Bee Brick suggested locations. April 2026. Footprint Architects
 - Proposed Site Plan 75CC13-FTP-ZZ-ZZ-DR-A 08-0007 P04. May 2026. Footprint Ecology.
 - Construction Environment Management Plan SE PLN 01. October 2023. Morgan Sindall
 - CEMP B. December 2025. The Landmark Practice
 - Statutory Biodiversity Metric 8FE. June 2026. The Landmark Practice

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), for Phase 1 (8FE) is 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. Flood lighting will not be installed within the application site until details of proposed new lighting demonstrates that boundary features remain unlit and lighting plans are 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.

REASON: To avoid illumination of habitat used by bats.

4. No development in relation to phase 2 (10FE) shall commence on site (including any vegetation removal or works to existing structures), until a Reptile Mitigation Strategy relating has been submitted to, and approved in writing by the Local Planning Authority. This strategy must be informed by surveys and shall include all precautionary measures to be implemented during the construction period, details of the proposed habitat creation and management and any translocation strategy required to ensure the protection of reptile species known to be present within the site.

REASON: To ensure adequate protection, mitigation and compensation for protected

5. Prior to the commencement of works for 10FE, 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.

Reptiles

There is a residual risk that reptiles could occur on the application site. These species are legally protected and planning permission does not provide a defence against prosecution. In order to minimise the risk of these species occurring on the site, the developer is advised to clear vegetation during the winter, remove all waste arising from such clearance and maintain vegetation as short as possible. If these species are found during the works, the applicant is advised to stop work and follow advice from an independent ecologist or the Council Landscape and Design Team (ecologyconsultations@wiltshire.gov.uk) /

Final sign off – all matters addressed:

Ecologist Jenna Buss	Date 09/07/2026
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