

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	16/12/2025
Application number:	PL/2025/08667
Proposal:	Application under Section 77 of the Conservation of Habitats and Species Regulations (2017) for the phosphorus mitigation associated with the approved prior approvals for the change of use at Renshaw Barns of commercial units to residential
Site address:	Buildings 1 & 3, Renshaw Barns, Netton, Salisbury, SP4 6FA
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

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date)
	Phosphorus neutrality	Habs Regs	16/12/2025 -The location plan of the proposed PTP	

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:

- Cover letter, Atlas Planning Group, October 2025
- Nutrient Calculator River Avon SAC

The site comprises three buildings. The application relates to prior approval developments of the conversion of commercial buildings to two dwellings (referred to as Building 1 and Building 3). A previous application (PL/2025/04561) for the conversion of Building 2 was approved, subject to nutrient-related mitigation.

COMMENTS:

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 (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.

It is noted that the development seeks to install a Graf one 2 Clean PTP at the site, though the location is unclear. **The applicant must provide a map showing the location of the PTP and, ideally, the HRA shadow assessment used for PL/2025/04561.** If the proposed PTP is offsite (i.e., the same tank proposed under PL/2025/04561), there must be a mechanism in place to secure this offsite mitigation in perpetuity.

The PIA certificate has been provided and the PTP has been incorporated into a submitted nutrient budget. The applicant wishes to use credits to cover the remaining nutrient burden, which was calculated as a total phosphorus budget of 0.41 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, uploaded 29/10/2025
Approval of Nutrient Budget	Budget – 0.41kg TP/year
	Budget approved - Yes
	Date – 16/12/2025

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.

These comments assume that this application qualifies for and will be proceeding with the Council-led scheme.

The mitigation fee and administration charge for the scheme can be paid by a section 111 agreement. It is also possible to pay the mitigation fee through a section 106 agreement or unilateral undertaking.

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.

If the application does not qualify for the Council-led scheme, or the applicant decides not to proceed with the scheme, details of an alternative mitigation strategy must be submitted for review and the Council's ecology team consulted. Any alternative mitigation scheme would be subject to a bespoke Appropriate Assessment.

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) requiring applications to deliver 10% BNG unless exempt. Based on the information available the biodiversity gain planning condition is not considered to apply to this application as it relates to development for which planning permission is granted by a development order (i.e., permitted development subject to prior approval). In any case, the development is 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.

DRAFT CONDITIONS:

1. Compliance with submitted documents

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

- Cover letter, Atlas Planning Group, October 2025
- Nutrient Calculator River Avon SAC
- **PTP location plan (to be provided)**

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

2. River Avon Phosphorus Mitigation

The development hereby permitted shall not commence until evidence of compliance to the Wiltshire Council River Avon Special Area of Conservation Mitigation scheme, or an alternative approved mitigation package addressing the additional nutrient input arising from the development, has been submitted to, and approved in writing by the Local Planning Authority.

Reason: To accord with the Conservation of Habitats and Species Regulations 2017, and Wiltshire Core Strategy Core Policy 69.

3. Water Efficiency in River Avon Catchments

The overnight development hereby approved shall be designed to ensure it does not exceed 110 litres per person per day water consumption levels (which includes external water usage) and a water efficiency assessment should be submitted. Before the development is brought into use, a water efficiency report certifying that this standard has been achieved shall be submitted to the local planning authority for its written approval.

REASON: To ensure compliance with the prevailing mitigation strategy for nutrient neutrality in the water catchment within which this development is located.

A water efficiency calculation will be needed to discharge this condition. For guidance on how to do this and what is required, please refer to the following document: '*The Building Regulations 2010 – Sanitation, hot water safety and water efficiency*', Appendix A (p36-44).

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/504207/BR_PDF_AD_G_2015_with_2016_amendments.pdf

4. PTP

The proposed package treatment plant and drainage field shall be installed, maintained and operated in accordance with the submitted specification and details hereby approved. Any subsequent replacements shall have an equivalent or improved performance specification. The package treatment plant and drainage field shall be installed, connected and available for use before the development is occupied and they shall be maintained and operated thereafter for the lifetime of the development.

REASON: To provide ongoing and adequate nutrient mitigation for the nutrient neutrality water catchment for the life of the development and to ensure that any future package treatment plant is of an equivalent or improved standard.

INFORMATIVE – River Avon Hampshire Catchment

Evidence of compliance to the Wiltshire Council River Avon Special Area of Conservation Mitigation Scheme means the certificate of allocation of credits and confirmation of financial contribution to the scheme. An alternative mitigation package must be approved by the local planning authority and Natural England with evidence of allocation to the scheme.

INFORMATIVE – Non-mains Drainage

A non-mains sewerage system is proposed. The area in which the development is located is within close proximity to the River Avon and may experience flooding and ground water conditions of concern. Primary responsibility for ensuring sewage systems for new developments are adequate lies with the Building Control Department. We would recommend you satisfy yourself that a non-mains sewerage system is appropriate and practicable in the circumstances taking into account ground water conditions throughout the year. For further guidance see the National Planning Practice Guidance "Water supply, wastewater and water quality". Any installation of a Package Treatment Plant needs to meet approval of Environment Agency's requirements under their permitting role.

INFORMATIVE – Nesting birds

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.

Note to case officer: It is acknowledged that this is not a full application, and some of the condition wording may need to be amended to reflect this.

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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