

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jessica Cracknell
Date:	13/04/2026
Application Number:	PL/2025/08565
Proposal:	Change of use of land from residential to camp site, the siting of 5 moveable camping pods and the conversion of an existing ancillary residential building to a holiday let.
Site Address:	Kamatan Acres, Larkhill Road, Durrington, Salisbury, SP4 8BH
Case Officer:	Joe Leesam

Recommendations:

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

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date submitted)
1	Habitat Regulations Assessment: River Avon Special Area of Conservation (SAC) Hampshire Catchment	NPPF, CP50, WCA, Habs Regs	13/04/2026 A completed River Avon SAC: nutrient neutrality calculators in an unlocked Excel file with the correct information submitted (see comments in main text)	NO
2	Biodiversity Net Gain (BNG)	Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021)	13/04/2026 Submission of statutory metric calculation with the correct baseline habitats, condition assessments and associated baseline habitat plans.	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;
- Biodiversity Net Gain Assessment. 15 January 2026. Eclipse Ecology. Report Ref. P280.1.0. Version. Final;
- The Statutory Biodiversity Metric. 14 January 2026;
- The Statutory Biodiversity Metric -Technical Annex 1: Condition Assessment Sheets and Methodology;
- Proposed Site Plan. Larkham Design Ltd. Drawing Ref. 1010/PL/02;
- Proposed Plan & Elevations. Larkham Design Ltd. Drawing Ref. 1010/PL/01;
- Existing Plan & Elevations. Larkham Design Ltd. Drawing Ref. 1010/Ex/02;
- Existing Location Plan & Site Plan. Larkham Design Ltd. Drawing Ref. 1010/Ex/01;
- Planning Statement. October 2025. Atlas Planning Group;

Salisbury Plain Special Protection Area (SPA)

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 strategic AA for Salisbury Plain SPA continues to be supported by NE until end of December 2026.

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 nutrient calculation has been submitted however the following issues were identified:

- **Average occupancy:** In the wastewater tab, the average occupancy is entered as 2. This must be corrected to 2.4 persons per dwelling for the conversion of an existing ancillary residential building, in line with Natural England's guidance;
- **Average occupancy (camping pods):** submission of a supporting statement providing clear evidence and justification for the proposed reduction in occupancy levels for the camping pods;
- **The Wastewater Treatment Works** is recorded as 'Amesbury STW' in the provided nutrient calculation. The application site falls into the 'Ratfyn STW' catchment;
- **The Current Land Use tab** has not been filled out;
- **The Future Land use tab** has not been filled out.

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. 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](#).

The application must submit their own mitigation strategy showing the development will achieve nutrient neutrality. Further details of the proposed mitigation strategy is required, to enable an Appropriate Assessment to be concluded favourably.

The calculation must be amended to address these issues, or suitable justification provided, and resubmitted to the Council for approval. The calculation must be approved by the council to enable the AA to be undertaken, which must be completed, and the conclusion agreed with Natural England prior to the application being determined.

Guidance on completing the phosphorus budget is available on our website ([Phosphorus and nitrogen mitigation - Wiltshire Council](#)). This webpage also contains information on the options available for developments to achieve nutrient neutrality.

The Council, as competent authority needs to have certainty that the development proposals will not have an adverse effect on the integrity of the European site.

Biodiversity Net Gain (BNG)

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.

A completed statutory metric calculation (14 January 2026) confirming the baseline and predicted post-development biodiversity units of the site has been submitted (including the condition assessment sheets and maps).

The following issues must be addressed in the baseline prior to determination:

- **Appendix 1 Pre-Development Habitat Map (Biodiversity Net Gain Assessment. 15 January 2026. Eclipse Ecology. Report Ref. P280.1.0. Version. Final) records 'sparsely vegetated land' within the baseline habitats, the Statutory Biodiversity Metric (14 January 2026) does not include this baseline habitat. To ensure accuracy and compliance, the baseline habitat types recorded within the statutory biodiversity metric and any accompanying habitat maps/documentation must align and, where necessary, amended to reflect the habitats actually present on site.**
- **The Statutory Biodiversity Metric (14 January 2026) records 'bare ground' and 'introduced shrub' within the baseline habitats, Appendix 1 Pre-Development Habitat Map (Biodiversity Net Gain Assessment. 15 January 2026. Eclipse Ecology. Report Ref. P280.1.0. Version. Final) does not include these habitats within the baseline habitat. To ensure accuracy and compliance, the baseline habitat types recorded within the statutory biodiversity metric and any accompanying habitat maps/documentation must align and, where necessary, amended to reflect the habitats actually present on site.**
- **The condition assessment sheets for *all* the baseline habitats have not been submitted, including the 'line of trees' habitat. This information is a minimum requirement set out in Article 7 of The Town and Country Planning (Development Management Procedure) (England) Order 2015 and must therefore be submitted for review by the ecology team prior to determination.**

The Biodiversity Gain Plan condition will require the submission of a Biodiversity Gain Plan demonstrating how the biodiversity objective (10% biodiversity net gain) will be met. The development can only legally commence once the Biodiversity Gain Plan condition has been discharged.

The Biodiversity Gain Plan must be accompanied by a completed Biodiversity Metric with the following issues addressed:

- **The Proposed Site Plan (Larkham Design Ltd. Drawing Ref. 1010/PL/02) does not align with Appendix 2 Post-Development Habitat Map (Biodiversity Net Gain Assessment. 15 January 2026. Eclipse Ecology. Report Ref. P280.1.0. Version. Final). All submitted documentation must align, with the same recorded habitats reflected across all documentation.**

Confirmation of how the development will achieve BNG is a post-determination matter however consideration should be given to how any proposed BNG will be secured.

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.

All details on exact locations and specifications must be added to all working plans 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. Bird/bat boxes will continue to be available for birds/bats for the lifetime of the development. See condition below.

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