

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jessica Cracknell
Date:	20/05/2026
Application Number:	PL/2025/09968
Proposal:	Change of use of upper floors from commercial to HMO (6 bedroom)
Site Address:	33 Catherine Street, Salisbury, SP1 2DQ
Case Officer:	Kate Clements

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	River Avon Special Area of Conservation (SAC) Hampshire Catchment	NPPF, CP50, Habs Regs	21/05/2026 A completed Natural England Nutrient Neutrality budget Calculator for the River Avon SAC: nutrient neutrality calculators in an unlocked Excel file with the correct information must be submitted. (see comments in main text)	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;
- Second Floor Plan As Existing/As Proposed. 22 December 2025. Build Architects. Project Ref. 2025/098. Drawing No. PP012;
- First Floor Plan As Existing/As Proposed. 18 February 2026. Build Architects. Project Ref. 2025/098. Drawing No. PP011. Rev. B;
- Ground Floor Plan As Existing/As Proposed. 18 February 2026. Build Architects. Project Ref. 2025/098. Drawing No. PP010. Rev. C;
- Block Plan As Proposed. 12 December 2025. Build Architects. Project Ref. 2025/098. Drawing No. PP006;
- Block Plan as Existing. 12 December 2025. Build Architects. Project Ref. 2025/098. Drawing No. PP005.

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:

- Water usage rate: The nutrient budget currently uses 110 litres per person per day. As stated on our website, 'the applicant can agree to a condition for water efficiency restricting water use to a maximum of 85 litres per person per day, or an alternative figure between 85 litres per person per day and 110 litres per person per day. Natural England require the nutrient calculator to include an additional 10 litres per person per day in the calculator. So, if you adopt the standard approach - 110 litres per person per day, then the calculator requires a figure of 120 litres per person per day to be used in the nutrient budget.' If the applicant opts for 110 litres per person per day instead of the required 120 litres, they must provide supporting evidence demonstrating how this will be implemented within the development. Please confirm if tighter water efficiency standards are being proposed and submit the necessary supporting documentation.
- Future Land Use: The nutrient budget records the future land use as 'commercial/industrial urban land'. According to the UK Gov guidance on using the nutrient neutrality calculators ([Using the nutrient neutrality calculators - GOV.UK](#)) Commercial or Industrial Urban Land is defined as: "Areas that are used for industry. These are businesses that typically manufacture, process or otherwise generate products. Included in the definition of industrial land are factories and storage facilities as well as mining and shipping operations." Based on the available information, a more appropriate land use classification within the nutrient calculator would be "Residential Urban Land".
- Sustainable Drainage Systems (SuDS): Evidence is required to demonstrate that on-site SuDS mitigation has been provided in line with [CIRIA: Using SuDS to reduce phosphorus in surface water runoff \(ciria.org\)\(opens new window\)](#). If the applicant opts for to use SuDS, they must provide supporting evidence demonstrating how this will be implemented within the development, including a SuDS schedule that sets out the different treatment drains and long term management to achieve best practice phosphorus removal.
- Confirmation of the proposed mitigation strategy is required. 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 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.

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 £3,960 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.

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 swifts, bats and hedgehogs.

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