

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jessica Cracknell
Date:	02/06/2026
Application Number:	PL/2026/02587
Proposal:	Conversion of Barn to 1no. Dwelling, Creation of Garden, Parking, Installation of Package Treatment Plant and Associated Works (Part Retrospective)
Site Address:	Netton Barn, Netton, Salisbury
Case Officer:	Hayley Clark

Recommendations:

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

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	02/06/2026 A completed River Avon SAC: nutrient neutrality calculators in an unlocked Excel file with all the information must be 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)	02/06/2026 Submission of statutory metric calculation with all the baseline habitats within the redline boundary, and associated baseline habitat plans and condition assessments. (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:

- Preliminary Ecological Appraisal and Biodiversity Net Gain Report. March 2026. Stark Ecology Ltd;
- Natural England Nutrient Neutrality budget calculator for the River Avon SAC;
- The Statutory Biodiversity Metric. 20 March 2026. V1;
- Proposed Site Plan. 20 May 2026. Birch Architects. Drawing No. 0181-02-024. Rev. A;
- Proposed Elevations. April 2026. Birch Architects. Drawing No. 0181-02-026;
- Proposed Elevations. April 2026. Birch Architects. Drawing No. 0181-02-027;
- Existing Site. 20 May 2026. Birch Architects. Drawing No. 0181-02-021. Rev. A;
- Existing Elevations. April 2026. Birch Architects. Drawing No. 0181-02-023;
- Planning, Design & Access Statement. RAW Planning. R20-008.

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 development seeks to achieve nutrient neutrality via a bespoke scheme (the installation of the package treatment plant as identified in Planning, Design & Access Statement. RAW Planning. R20-008).

A positive conclusion to the Habitats Regulations Assessment requires certainty that the development proposals will not have an adverse effect on the integrity of the European site. Currently the application does not demonstrate how the impacts of these increases in phosphorus will be mitigated. The following information is required:

- 'Package Treatment Plant User Defined' has been selected for the wastewater treatment works, but the corresponding PIA certificate for the proposed PTP has not been provided. Further details of the proposed PTP must be submitted.
- Mitigation strategy: The application does not currently demonstrate how the increase in phosphorus will be mitigated. 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. 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.

Protected Species

Stark Ecology Ltd assessed the site as having negligible potential to support roosting bats. The site is assessed as offering suitability for foraging and commuting bats. Subject to retention of key boundary features and implementation of a sensitive lighting strategy, it is likely that the functionality of the habitats within the site and their availability to bats will not be adversely affected. The proposed conversion of a barn to a dwelling will not require removal of any vegetation considered to be functionally valuable to foraging or commuting bats.

The habitat within the proposed development site and the surrounding area is suitable for roosting, foraging and commuting bats. An increase in artificial lux levels can deter bats which could result in roost abandonment and/or the severance of key foraging areas. Any new lighting should be for the purposes for safe access and security and be in accordance with the appropriate Environmental Zone standards set out by the Institute of Lighting Engineers in their publication GN01:2021, 'Guidance for the Reduction of Obtrusive Light' (ILP, 2021), and Guidance note GN08/23 "Bats and artificial lighting at night", issued by the Bat Conservation Trust and Institution of Lighting Professionals.

The adults, young, eggs and nests of all species of birds are protected by the Wildlife and Countryside Act 1981 (as amended) while they are breeding. Please be advised that works should not take place that will harm nesting birds from March to August inclusive. 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.

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.

A completed statutory metric calculation (20 March 2026. V1) 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:

- The Baseline Habitat Map redline boundary within the Preliminary Ecological Appraisal and Biodiversity Net Gain Report (March 2026. Stark Ecology Ltd) used for the BNG assessment is different from the redline boundary shown on other documents such as the Proposed Site Plan (20 May 2026. Birch Architects. Drawing No. 0181-02-024. Rev. A). The redline application boundary and site boundary used for the BNG assessment must match within all provided documentation.

The statutory metric calculation must be amended to accurately reflect all the correct baseline habitats within the redline boundary, with the associated baseline habitat plan and condition assessments and submit the updated metric and associated documents to the Local Planning Authority (LPA) for review by the ecology team prior to determination.

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 bats, swifts and hedgehog.

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. Bird/bat boxes will continue to be available for birds/bats for the lifetime of the development.

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

