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By email

Date: 9 July 2026

Dear Sir / Madam,

Subject: Planning Statement / Covering Letter- Section 73 Application for Site 3, Trenchard Lines, Upavon. (Amendment of conditions 10 and 11 on application number PL/2022/09191).

This Planning Statement / covering letter has been prepared to accompany a Section 73 application to enable the variation of conditions 10 and 11 of planning permission PL/2022/09191 on Site 3, Trenchard Lines. The variation is intended to enable the occupation of the permitted building prior to the completion of improvements to the Wastewater Treatment Works, (WwTW), serving the site, as their implementation has been delayed. The letter sets out the background to the request and explains the approach being taken to ensure Nutrient Neutrality.

You may recall that planning permission for the demolition of an existing building and the development of a new block of Single Living Accommodation, (SLA), on the above site was granted on 22 July 2024 – application number PL/2022/09191. A Section 73 application to amend Condition 7 of the planning permission was subsequently submitted and was approved on 29 April 2025 – application number PL/2025/01636. As the proposed development of SLA on site 3 (and on the nearby Site 1) would create additional bedspaces, there was a need to ensure that it did not result in an increase in nutrients entering the River Avon, a Special Area of Conservation (SAC), and the application proposed improvements to the WwTW that serves the Trenchard Lines site. Condition 10 of application number PL/2022/09191 requires that no new residential bed spaces be occupied until the upgrade of the WwTW is completed. Condition 11 includes the requirement that 3 months of monitoring data be submitted and approved by the LPA prior to the first occupation of the building.

The final design and construction of the SLA building permitted on Site 3 has progressed significantly and completion is anticipated in July 2026.

The design of the WwTW has proceeded in parallel with the construction of the approved building. Confirmation was received in November 2024 that the proposed works would be Permitted Development

under the provisions of the General Permitted Development Order 2015 (as amended) – your ref. ENQ/2024/01454.

Unfortunately, the tender exercise for the RIBA Stage 4 design resulted in significant changes from the RIBA Stage 3 exercise and means that the work needs to be retendered. As a result, completion of the improvements to the WwTW is now scheduled for December 2027. There is therefore a 'gap' of around 18 months between the completion of the SLA building and the completion of the WwTW upgrade and the Defence Infrastructure Organisation, (DIO), are concerned that, in the interim:

1. Service personnel will continue to occupy lower quality accommodation despite more modern accommodation being available; and
2. The building will need to be maintained, despite not being occupied – a waste of scarce resources.

DIO have therefore explored a number of options for bringing the SLA building on Site 3 into use before the WwTW upgrades are complete, while continuing to ensure that there is no adverse impact on the SAC.

Pre-Application Request

A request for pre-application advice on the proposed approach was submitted in April 2026 - ENQ/2026/00769.

The identified solution required DIO to cease using five existing SLA buildings for accommodation purposes until the improvements to the WwTW have been completed and monitoring has confirmed that the WwTW is operating successfully. The identified buildings provided a total of 39 bedspaces, ten fewer than the proposed building on Site 3 will provide; the balance of ten bedspaces would be accounted for by an excess of 10 bedspaces previously taken out of service as part of enabling the construction and occupation of SLA on Site 2. (The proposed methodology is set out in greater detail, below).

A meeting with the case officer, Julie Mitchell, subsequently took place on 28 May 2026. The case officer confirmed that the principle of taking lower quality bedspaces out of use to enable the occupation of the SLA block on Site 3 was likely to be acceptable. The main point of discussion centred on the use of the ten 'excess' bedspaces previously identified, as part of the Nutrient Neutrality calculation. It might be acceptable but would require further consideration by the LPA's specialist consultees and a more straight forward solution would be to identify a further 10 bedspaces to 'balance' those proposed to be occupied on Site 3.

Following the meeting, DIO have worked with the SLA managers on site to try and identify 10 additional bedspaces that could be removed from service. Number 8 York Road has subsequently been identified and contains 2 bedspaces: those have been reflected in the calculations, below. Unfortunately, it has not proved possible to identify any further buildings.

Proposed Nutrient Neutrality Solution

As indicated above, DIO now propose to cease using six existing SLA buildings for accommodation purposes until the improvements to the WwTW have been completed and monitoring has confirmed that the WwTW is operating successfully. (The buildings are identified on the plan, below). The buildings currently provide a total of 41 bedspaces, as shown in Table 1, below.

Figure 1: Location of Identified SLA Buildings

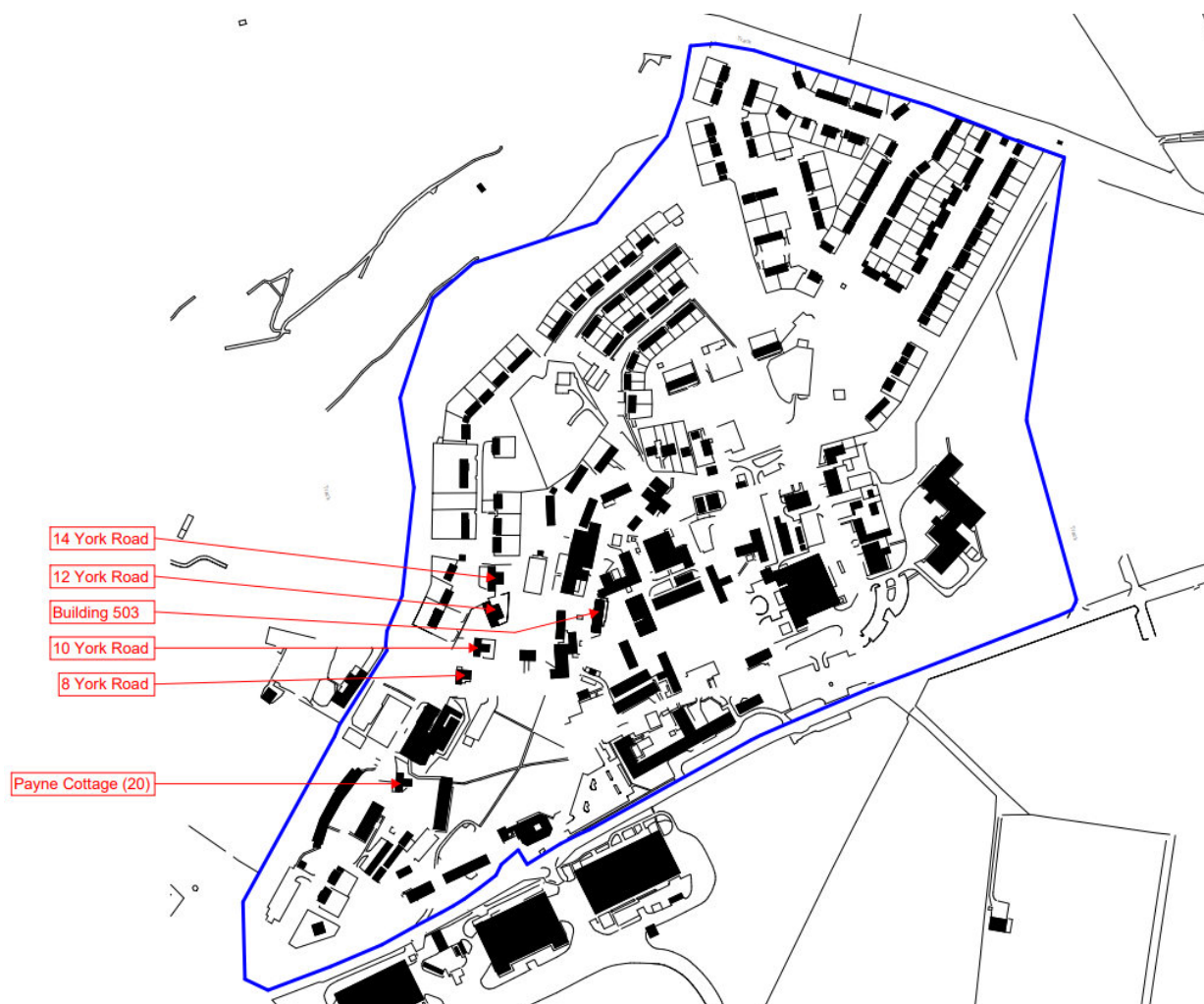


Table 1: Bedspaces Proposed To Be Removed

Building Number / Address	Bedspaces
Building No. 503	23
Payne Cottage	2
8 York Road	2
10 York Road	4
12 York Road	5
14 York Road	5
Total Bedspaces	41

The SLA building being constructed on Site 3 contains a total of 49 bedspaces and there is therefore a need to identify a minimum of 8 further bedspaces that can be removed from service in order to ensure no likely impact on the River Avon.

A similar exercise of identifying lower quality accommodation that could be taken out of service was undertaken in 2024 in order to facilitate the construction of SLA buildings on Site 2 – see application PL/2023/10827. At that time, a number of existing SLA buildings were identified to be taken permanently out of SLA use and DIO entered into a Unilateral Undertaking to ensure that the buildings were not subsequently reused for SLA purposes. (The majority of them have subsequently been demolished to facilitate the construction of the approved developments on Site 1 and Site 3). Table 2, below, shows the buildings that were removed from SLA use at that time and shows that the changes resulted in a net loss of 10 bedspaces on the Trenchard Lines site, i.e., ten above what was necessary to simply 'balance' the SLA proposed on Site 2. This 'excess' arose due to the need to demolish entire buildings to enable the approved developments on sites 1 and 3 and the unsuitability of Building 29 for continued SLA use.

Table 2: Bedspaces Removed To Facilitate Development & Occupation of Site 2

Proposed Development	Bedspaces Removed From use	Bedspaces Created	Net Change	Note
Vacation of Building 29 (on Site 1)	9	0	-9	No longer used for accommodation purposes.
Vacation of Building 30 (on Site 1)	9	0	-9	Now demolished to enable approved development.
Vacation of Building 31 (on Site 1)	7	0	-7	Now demolished to enable approved development.
Vacation of Building 394 (on Site 3)	19	0	-19	Now demolished to enable approved development.
Demolition of Buildings 184 and 399 (on Site 2)	48	0	-48	Now demolished to enable approved development.
Construction of new SLA on Site 2	0	82	+82	Now occupied
Total	-92	+82	-10	

The reduction in the number of SLA bedspaces at Trenchard Lines, associated with the construction and occupation of the SLA on Site 2, has taken place relatively recently and post-dates the advice from Natural England regarding Nutrient Neutrality: everything being equal, it has likely resulted in a reduction in the nutrients flowing from the site compared to the original 'baseline'. Having regard to the timing, the applicant believes that it should be taken into account when considering whether the proposed changes set out in Table 1, above, and the variation of the planning conditions would impact the Nutrient Neutrality of the site.

The permitted SLA building on Site 3 will create 49 bedspaces. Taking into account the bedspaces removed from SLA use to facilitate the development and occupation of Site 2 and the bedspaces now proposed to be removed from service, there would be a net decrease of 2 bedspaces compared to the baseline position following the occupation of the permitted building on Site 3 (and therefore no increase in nutrients entering the SAC). This is shown in Table 3, below:

Table 3: Overall Change in Bedspace Numbers

Proposed Development	Net Change in Bedspaces Numbers
Bedspaces Proposed To Be Removed (Table 1)	-41
Net Change from Site 2 (Table 2)	-10
Approved Site 3 Bedspaces	+49
Total Net Change	-2

Proposed Rewording of Planning Conditions

It is proposed that Conditions 10 and 11 of application number PL//2022/09191 be amended as follows.

Condition 10 would be amended to read:

'The Single Living Accommodation building hereby permitted shall not be occupied or brought into use until either:

- a) None of the existing SLA buildings identified on Plan number XXXXX are used for SLA purposes; or
- b) The scheme for Enhanced Biological Phosphorous Removal, designed to meet an annual average TP permit of 0.3 mg/l, has been constructed and brought into use at the MOD Wastewater Treatment Works serving the site (as shown identified on the location plan numbered Z9A5615Y19-HLM-00-00-DR-A-000006 P01) and detailed in the Trenchard Lines Planning Report Nutrient Neutrality Mitigation. Document Ref: Z9A5615Y19-ARC-XX-XX-RP-J-000059. Revision 3 (Arcadis, April 2023). The approved EBPR scheme shall thereafter be maintained for the lifetime of the development hereby approved.

REASON To ensure that the proposed development achieves nutrient neutrality having regard to the location of the site within the catchment of the River Avon SAC.'

Condition 11 would be amended to read:

'The following details shall be submitted to and approved in writing by the Local Planning Authority prior to any reuse for SLA purposes of any of the buildings identified on Plan number XXXXX:

- Confirmation that the installation of Enhanced Biological Phosphorous Removal has been completed in accordance with the approved mitigation scheme and brought into use;
- Confirmation of the Environment Agency permit with Total Phosphorous (TP) limit at the Wastewater Treatment Works; and
- A minimum of 3 months monitoring data for the Waste Water Treatment Works confirming it is operating within the Total Phosphorus (TP) limit of the EA permit.

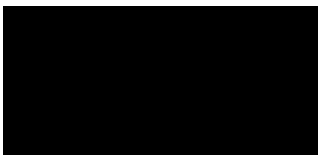
REASON: To ensure that the proposed development achieves nutrient neutrality having regard to the location of the site within the catchment of the River Avon SAC.'

The application is supported by a (draft) Unilateral Undertaking that will ensure the identified buildings will not be used for SLA purposes until the necessary improvement of the WwTW has taken place and the WwTW has been shown to be operating satisfactorily. (At that time, the additional treatment capacity created at the WwTW will mean that the buildings could revert to SLA use, if required, without having an adverse impact on the River Avon SAC). In the interim, the buildings will be used for alternative purposes by MOD and maintained appropriately.

In summary, the proposed variation of the two planning conditions would not alter the scale, form or use of the approved development. The sole purpose of the proposed amendments is to provide an alternative mechanism for demonstrating Nutrient Neutrality by ensuring that occupation of the bedspaces in the approved building would not result in an increase in the number of occupied bedspaces on the Trenchard Lines site, compared to the baseline figure. (The proposal will actually result in a net reduction of 2 bedspaces). There will be no increase in nutrients entering the River Avon SAC arising from the proposal and it would therefore have no adverse effect on the integrity of the SAC.

Should you have any questions regarding this request for pre-application advice, please do not hesitate to contact me.

Yours faithfully,



Rob Sanderson
Associate Technical Director

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