

Council Planning Consultation Response

ECOLOGY

Officer name:	Elizabeth Burrows
Date:	15/07/2026, 12/08/2026 ECO2 (red text)
Application No:	PL/2026/01659
Proposal:	Change of use of an existing Barn which is to be demolished and replaced with a 4 bedroom dwelling of the same size and mass.
Site Address:	Allenmead House, 30 Woodland Road, Patney, Devizes, SN10 3RG
Case Officer:	Lucy Rutter-Dowd

Recommendations:

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

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.

Information considered:

- Proposed Site Plan and Landscaping. (Erigo Passivhaus Ltd, 6 March 2026).
- ~~Nutrient Calculation~~
- Preliminary Ecological Appraisal Report. (Stark Ecology, June 2026).
- Amended Nutrient Neutrality Budget Calculator River Avon submitted 5 August 2026.
- Water Efficiency Calculations (Erigo Passivhaus).

COMMENTS:

Habitats Regulations Assessment

Salisbury Plain 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.

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 submitted nutrient calculation (Nutrient Calculator 12th May 2026) calculated a total phosphorus budget of 0.21 kg TP/year pre 2030 and 0.04 kg TP/year post 2030. The budget has been approved by Wiltshire Council.~~ **The Amended Nutrient Neutrality Budget Calculator for the River Avon, submitted on 5 August 2026, uses a water consumption rate of 67.5 litres/person/day, which is below the minimum level accepted by Natural England. The minimum water use is 85 litres/person/day, and when the required additional allowance of 10 litres/person/day is applied, the calculator should use a value of 95 litres/person/day. Water Efficiency Calculations indicating reduced water usage is achievable has been submitted therefor to progress the application, I have amended the calculator to reflect the lowest accepted water consumption figure. The revised calculation (Nutrient Neutrality Budget Calculator River Avon WC edits 12082026) results in a total phosphorus budget of 0.16 kg TP/year pre-2030 and 0.03 kg TP/year post-2030.**

Wiltshire Council has reviewed and approved this revised nutrient budget.

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 – Nutrient Calculator 12th May 2026 Nutrient Neutrality Budget Calculator River Avon WC edits 12082026 and Proposed Site Plan and Landscaping. (Erigo Passivhaus Ltd, 6 March 2026)
Approval of Nutrient Budget	Pre 2030 budget – 0.21 0.16kg TP/year Budget approved - Yes Date - 15/07/2026 12/08/2026

Council-issued phosphorus credits are expected to be available; however, to ensure that adequate mitigation is secured and deliverable for this development, the necessary credits must be secured as part of the permission.

Where Council mitigation is secured with the permission, 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.

The applicant has confirmed that they will be securing credits with the permission. The application must not be positively determined until the P-credits have been secured. These comments assume the development will be mitigated using the council scheme. Please re-consult ecology if this is not the case.

In the absence of a legal agreement the mitigation fee and administration charge for the scheme can be paid by a section 111. The administration fee must be paid on the granting of permission, the mitigation fee is payable prior to commencement of development.

The cost of phosphorus credits from the Council's strategic scheme to mitigate the burden would be ~~£8,925.00~~ **£6,800** (£42500 per 1 kg/TP) plus legal and admin fees (£446.25).

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.

[Development Application in the Hampshire Avon Catchment](#)

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 application is for self and Custom Build Development, meaning development which:
 - o consists of no more than 9 dwellings;
 - o is carried out on a site which has an area no larger than 0.5 hectares; and
 - o consists exclusively of dwellings which are self-build or custom housebuilding (as defined in section 1(A1) of the Self-build and Custom Housebuilding Act 2015).

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.

CONDITIONS:

The following, or similarly worded, conditions are recommend:

Water efficiency

The overnight development hereby approved shall be designed to ensure it does not exceed **85** 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

Sign off by WC Ecologist will only be given once ALL outstanding information has been submitted and agreed sufficient.

Ecologist	Date
Elizabeth Burrows	15/07/2026 , 12/08/2026