

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	01/04/2026, 30/06/2026, 28/09/2026
Application number:	PL/2026/01754
Proposal:	Permission in Principle for erection of a single detached dwelling
Site address:	Land between Long Craggs and Bower House, Church Street, Bowerchalke, Salisbury
Case officer:	Sarah Hill

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date)
a)	River Avon SAC	Habitat Regulations, NPPF, Wiltshire CP50	01/04/2026 -Nutrient budget -Mitigation	No (30/06/2026) Yes (28/09/2026) Provided a PTP is installed as appropriate

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 consulting Ecology. I have reviewed the application and supporting documents against OS Maps, aerial photography of the site and surrounding area, together with GIS layers of statutory and non-statutory designated sites and existing records of protected species. My second comments are shown in blue; third in red.

The site comprises an area of land between dwellings to the north, south and west. No plans or ecological information, further to a location plan, have been submitted. As per aerial imagery, the site appears to contain scrub, trees, hedgerow and grassland. The application form states that this plot was previously used as an allotment.

This application seeks permission in principle to erect one dwelling.

COMMENTS:

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.

Paragraph 1A of regulation 70 of the Conservation of Habitats and Species Regulations 2017 states that the assessment provisions apply to "granting permission in principle under section 59A of the TCPA 1990 (Development orders: permission in principle)". This makes it clear that the LPA must make an Appropriate Assessment (AA) of the implications of the proposal before any Permission in Principle is authorised. Further information can be found within the Government's [guidance for applications for permission in principle](#).

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 an increase in phosphorus will be mitigated.

A completed River Avon SAC nutrient neutrality calculator has not been submitted. The approved calculation is required 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.

Please note that conditions to ensure no adverse impacts on European sites cannot be imposed for this type of application (Permission in Principle).

Thank you for providing a nutrient budget and nutrient statement. The submitted nutrient budget calculates a total phosphorus budget of 0.05 kg TP/year. However, the following issues must be addressed:

- PTP:
 - It is proposed to install a PTP. However, the specification, location and PIA certificate of this PTP have not been provided (please note, the link provided in the nutrient statement does not open).
 - When considering the feasibility of a PTP, we also need to know:
 - Whether the PTP will discharge into a watercourse or drainage field
 - If the latter, whether a suitable drainage field can be installed
 - There can be no built structure on top of a drainage field, and the drainage field must be located a certain distance from the proposed dwelling and any neighbouring dwellings. The PTP itself must also be a set distance away from the dwellings. These requirements are set out in the Building Regulations 2010 'Drainage and waste disposal'. Demonstration that it will be possible to achieve this is needed.
- Land use:
 - In the "nutrients from current land use" tab, the rainfall should be entered as 1,000-1,100mm. Please see the map of average rainfall values from UK CEH ([NRFA station catchment information](#))
 - In the "nutrients from future land use" tab, residential urban land is entered as 0.04ha. There is a shortfall of 0.02ha, as the total site area is 0.06.
- SuDS:
 - The budget includes SuDS comprising permeable paving and a soakaway to offset some of the nutrient burden. However, the specifications, measurements and locations of these features have not been provided. Furthermore, as the site is currently comprises green space, the addition of, e.g., permeable paving does not represent a nutrient benefit from development. This section of the budget should therefore be left blank, unless it can be demonstrated that SuDS will be included within the development that serve as a betterment of the current scenario.

The nutrient statement indicates that credits will be sought. It is unclear whether the applicant wishes to use the council-led scheme – confirmation is needed. Mitigation (including the

provision of an appropriate PTP and/or purchase of credits) will need to be secured through an appropriate legal agreement if permission in principle is granted, and the contribution secured prior to commencement of development, which could potentially be triggered at the technical details consent stage. Legal advice should be sought.

Thank you for providing an updated nutrient budget. The points above, in relation to SuDS and the land use tabs, have been sufficiently addressed. The submitted nutrient calculation calculated a total phosphorus budget of 0.16 kg TP/year.

The PTP specifications and PIA certificate have now been provided. However, the PTP location and drainage field details have not been submitted, as the final scheme remains unconfirmed at the PiP stage – full details must be submitted at the technical details consent submission. Considering the size of the site (0.07 ha), distance between neighbouring buildings, and low number of dwellings proposed (1), the risk of not being able to install a PTP appears low, but it is advised that Drainage is consulted on this matter.

Provided a PTP can be installed, the nutrient budget has been approved by Wiltshire Council. A Council-led scheme of phosphorus credits will be available for development which meets certain criteria at a fixed cost per kilogram of phosphorus. Council-issued phosphorus credits are currently available in the relevant sub-catchment at the time of writing. The cost of phosphorus credits from the Council's strategic scheme to mitigate the burden would be £6,800 (£42500 per 1 kg/TP) plus legal and admin fees.

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.

As noted above in blue, mitigation will need to be secured through an appropriate legal agreement at the permission in principle stage. This is because there must be certainty that any adverse effects on the integrity of the European site would be avoided. Therefore, there must be a mechanism through which to secure the necessary mitigation, at PiP, that enables the AA to draw a positive conclusion, at PiP (please see appeal ref: APP/Y3940/W/24/3358035). Mitigation must be secured through a legal agreement such as a s106 or unilateral undertaking, and the trigger for delivery could be the associated technical details consent. Legal advice should be sought.

Where an applicant chooses to progress without securing Council mitigation (i.e., Council credits) at permission, a legal agreement will still be required (in place of Grampian conditions that would be used for a full application), and a bespoke AA must be prepared and sent to NE, and the application must not be determined until NE have endorsed the AA.

Protected species and habitats

The site and surrounding area may be suitable for use by bats, badgers, nesting birds, amphibians and reptiles. Bowerchalke SSSI lies 460m southeast.

Core Policy 50 of the Wiltshire Core Strategy requires all development to demonstrate:

- i. No net loss of local biodiversity resource and
- ii. Secure the integrity of local ecological networks

The scope of permission in principle is generally limited to location, land use and amount of development. At the technical details consent stage, evidence to demonstrate that there will be no net loss of local biodiversity resource, and that the integrity of ecological networks will be maintained, must be submitted for review by the LPA's ecology team. Ecological information submitted at that stage should consider the presence of protected and priority species and habitats, and any relevant mitigation as well as enhancements.

Biodiversity Net Gain

The grant of permission in principle is not a grant of planning permission, and so the mandatory biodiversity gain requirement does not apply at this stage. The subsequent technical details consent will be subject to the biodiversity gain condition. Please note that applications subject to the biodiversity gain condition must be accompanied by minimum information set out in [Article 7 of The Town and Country Planning \(Development Management Procedure\) \(England\) Order 2015](#), which includes:

- [the completed metric calculation tool](#) showing the calculations of the pre-development biodiversity value of the onsite habitat on the date of application (or proposed earlier date) including the publication date of the biodiversity metric used to calculate that value;
- a description of any [irreplaceable habitat](#) (as set out in [column 1 of the Schedule to the Biodiversity Gain Requirements \(Irreplaceable Habitat\) Regulations 2024](#)) on the land to which the application relates, that exists on the date of application, (or an earlier date); and
- plan(s), drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application (or earlier proposed date), including any irreplaceable habitat (if applicable).

Note: this is a summary, please refer to Paragraph: 011 [Biodiversity net gain - GOV.UK](#) for full details.

If the applicant considers that the development would not be subject to the biodiversity gain condition, Schedule 7A of the Town and Country Planning Act 1990 the applicant must provide a statement as part of the planning application setting out the reasons why they believe this is the case. Submission of a completed metric calculation tool may be necessary to evidence the statement.

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

Ecologist Abi Gazzard	Date 28/09/2026
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