

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jenna Buss
Date:	20/01/2026
Application number:	PL/2024/09976
Proposal:	Outline planning permission with all matters reserved apart from details of access from Southampton Road, for a residential development of up to 47 dwellings, along with associated public open space, landscaping and biodiversity enhancements and a car park to serve the community allotments
Site address:	Land off Southampton Road and Junction Road, Alderbury, Wiltshire
Case officer:	Joe Richardson

Recommendations:

	No Comment
	Support
	No objection
	Condition (no objection subject to conditions)
x	Objection - further information required
	Objection in principle
	HRA completed/required

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date)
1	Ecology	Habitat Regulations, NPPF, CP50	- Ecological parameters plan outlining habitats to be lost, those retained, created and enhanced. - Dormouse Mitigation Strategy-habitat retention/creation mapping - Bat Impact assessment and updated Mitigation Strategy - Reptile mitigation strategy detailed on the ecological parameters plan - Demonstration of no net loss of priority habitats under CP50 and detailed mitigation proposals	
2	River Avon Hampshire Catchment – Nutrient Neutrality	Habitat Regulations	- Excel spreadsheets of the nutrient burden - Demonstration that mitigation strategy has been secured	
3	River Test- Nutrient Neutrality	Habitat Regulations	- Excel Spreadsheet of proposed Surface Water burden - Demonstration that mitigation strategy has been secured	

4	BNG	Environment Act 2021	• Updated BNG mapping to support the botanical surveys • Condition assessment sheets for habitats excluding those submitted in the botanical assessments • Assessment of habitat loss in line with the dormouse mitigation strategy • Updated metric to address metric errors due to loss of baseline habitat of very high distinctiveness.	
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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.

I have reviewed the application and supporting documents against OS Maps and aerial photography of the site and surrounding area, together with GIS layers of statutory and non-statutory sites and existing records of protected species.

The following submitted documentation was reviewed to inform this response:

- Preliminary Ecological Appraisal. November 2023. CWS
- BNG Assessment. November 2024. CEC Ltd
- Nutrient Neutral Assessment. October 2024. Nutrient Neutral
- The Statutory Biodiversity Metric. July 2024. Somerset Wildlife Trust Consultancy
- Soft Landscape Strategy (1 of 4) 22-125-01. Nov 2023. BEA Landscape Design Ltd
- Soft Landscape Strategy (2 of 4) 22-125-02. Nov 2023. BEA Landscape Design Ltd
- Soft Landscape Strategy (3 of 4) 22-125-03. Nov 2023. BEA Landscape Design Ltd
- Soft Landscape Strategy (4 of 4) 22-125-04. Nov 2023. BEA Landscape Design Ltd

Additional information submitted and reviewed January 2026.

- Reptile Survey Report and Mitigation Strategy. July 2025. Cotswold Wildlife Surveys
- Bat Mitigation Strategy. September 2025. Cotswold Wildlife Surveys
- Hazel Dormouse Mitigation Strategy. July 2025. Cotswold Wildlife Surveys
- Ecological Impact Assessment. September 2025. Cotswold Wildlife Surveys
- Notice of Planning Permission. December 2025. Test Valley Borough Council
- Grassland Assessment. May 2025. Leppitt Associates
- BNG Assessment. August 2025. Andy Warren

Protected and Notable Species/Habitats

We note the proposal to create a residential development of up to 47 dwellings along with associated public open space, landscaping and biodiversity enhancements and a car park to serve the community allotments at land off Southampton Road and Junction Road Aldebury.

The site sits adjacent to priority Ancient Woodland habitat and the County Wildlife Site (CWS) of Ivy Church Copse to which the site is functionally linked. Aldebury Canal another County Wildlife Site lies to the south-east and although not adjacent to this site, is also functionally linked by a network of mature hedgerows.

Additional surveys undertaken identified areas of lowland meadow, a Habitat of Principal Importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006, which is proposed to be lost to development.

Dormice

Dormice have been confirmed on site and are subject to strict protection under the Conservation of Habitats and Species Regulations 2017 (as amended). They are therefore a material consideration within the planning process, and sufficient, appropriate mitigation measures must be submitted to demonstrate that the species will not be adversely affected by the proposed development.

The intention to retain boundary features and elements of woodland and habitat that support dormice is welcomed. However, the extent of habitat loss and retention remains unclear. Mixed scrub and bramble scrub will be lost to the development and the creation of hedgerow although welcome will be poor condition and/or ornamental in nature, as outlined within the BNG. An ecological parameters plan is required to clearly demonstrate areas to be lost and retained to demonstrate that the species will not be adversely affected by the proposals.

Although increased predation risk is acknowledged within the submitted EIA report, it is not addressed in the dormouse mitigation strategy. Targeted habitat enhancement or creation at key locations should be incorporated to maintain ecological connectivity and support safe movement of dormice across the site.

Further information is required in the form of an updated parameters plan detailing the habitats to be lost and retained, along with specific planting or enhancement measures that demonstrate the retention of the green infrastructure network for dormice to ensure no net loss of dormouse habitat.

A lighting strategy must also be provided to ensure that key habitat features are preserved as dark foraging and commuting corridors for this species.

All proposed habitat creation and enhancement should include species appropriate planting and be supported by a detailed landscape management plan to ensure retention of suitable habitat in perpetuity.

Bats

A range of bat species was recorded on site, including serotine, Leisler's, common and soprano pipistrelle, barbastelle, Natterer's, noctule and Daubenton's. Bats and their roosts are strictly protected under the Conservation of Habitats and Species Regulations 2017 (as amended) and are therefore a material consideration in the planning process.

The submitted information does not include the details of the bat activity surveys including transect maps of the survey routes undertaken. It would appear that the surveys of the veteran

trees did not include full emergence surveys and were starting points for transect surveys and therefore do not conform to best practice. Only limited assessment of potential impacts is provided. Given the number of species using the site for foraging and commuting, and the ecological connectivity between the adjacent County Wildlife Sites, a more robust assessment is required.

The submitted bat mitigation strategy does not address the implications of losing the lowland meadow habitat, which is likely to support high invertebrate abundance and therefore important for foraging bats. Further consideration should be included in the impact assessment and mitigation strategy.

The GLTA findings are acknowledged, and it is noted that no suitable roost features were identified in trees other than the veteran oaks on the northern boundary, which are to be retained.

The proposed mitigation measures—including hedgerow retention, design measures to reduce lighting impacts, and the installation of bat boxes—are welcomed. Enhancements to the wet woodland are also noted; however, details of these enhancements and their locations must be provided and shown on an ecological parameters plan to provide quantifiable evidence of these enhancement measures.

A sitewide lighting strategy is also required to ensure that dark, continuous foraging and commuting routes are maintained post construction.

Reptiles

Reptile surveys identified robust populations of slow worm and grass snake, indicating likely breeding populations. However, age and sex data were not provided.

The proposed mitigation strategy includes fencing and translocation but omits the central wooded area where a footpath is proposed. Additionally, no details have been supplied regarding the receptor site, including its location, size, or suitability assessment.

Further information is therefore required, including full details of the receptor site, management proposals for retained green infrastructure, and opportunities for habitat enhancement for these species which should be included on an ecological parameters plan.

Botanical Surveys

We welcome the botanical surveys of the site which were undertaken in May 2025 prior to mowing. The surveys concluded the site is floristically diverse with a complex mosaic of sward types with the inclusion of purple moor grass and rush pasture habitat and lowland meadow, both of which are priority habitats. The surveys concluded that 1.106ha of lowland meadow is in good condition and 0.96ha in poor condition, the majority of these priority habitats are proposed to be lost to development.

The current proposal as outlined within the Ecological Impact Assessment is to offset the loss of these priority habitats by enhancing retained grassland together with the purchase of offsite habitat credits under BNG.

However, the high conservation value of lowland meadows is reflected in its designation as a Habitat of Principal Importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. The proposed loss of these habitats and limited details of the

mitigation strategy is cause for concern combined with no information on the justification of this loss demonstrating that the mitigation hierarchy has not been adhered to.

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

Insufficient information to demonstrate no net loss of these priority habitats has been submitted.

Evidence demonstrating no net loss of this local biodiversity resource and retention of these priority habitats must be secured. Additional information as detailed below must be submitted and reviewed by the LPA's ecology team prior to a planning permission being given.

- Detailed mitigation strategy to demonstrate no net loss of these habitats
- Detailed mapping to show the priority habitats to be lost, retained, and areas to be enhanced
- Detailed landscaping plan to demonstrate how these habitats will be retained and managed in perpetuity and isolated from potential impacts from recreational pressures.

We would also advise that advice from Natural England is sought in relation to these proposals and the proposed loss of these priority habitats prior to the submission of the additional information requested above.

Habitat Regulations Assessment: River Avon Special Area of Conservation (SAC) Hampshire Catchment

The foul water discharge of this application will enter 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 Assessment has been submitted in support of the application, however the following issues were identified: The development seeks to achieve nutrient neutrality via a bespoke scheme involving the upgrade of a septic tank at Gray Manor Hotel, Cholderton to a PTP system, details of which have not been provided. This method of mitigation is agreeable in principle. However, 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 fully demonstrate how the impacts of these increases in phosphorus will be mitigated. Additional information is therefore required and this should include;

- Details of the proposed PTP system upgrade

- The location of the upgrade demonstrating the locations is within the River Avon Hampshire catchment.
- Evidence of a legal agreement between the owners of the upgrades and the applicant linking the mitigation to this proposal specifically or evidence of the purchase of the nutrient credits created and demonstration of how nutrient neutrality will be met.
- Details of the proposed monitoring methods to ensure the retention of the mitigation in perpetuity.

For the council to fulfil its monitoring responsibilities. A nutrient monitoring contribution will be required and secured via a separate legal agreement.

The nutrient assessment must be amended to address these issues. 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.

Solent Maritime Special Area of Conservation (SAC), Chichester and Langstone Harbours Special Protection Area (SPA) and Ramsar site, Portsmouth Harbour SPA and Ramsar site, Solent and Southampton Water SPA and Ramsar site

The site sits within the River Test Catchment and although foul water will discharge into the Salisbury Petersfinger WWTW in the Avon Hampshire Catchment, surface water will drain into the Test Catchment.

This region is protected by a number of international designations including the Solent Maritime Special Area of Conservation (SAC), Chichester and Langstone Harbours Special Protection Area (SPA) and Ramsar site, Portsmouth Harbour SPA and Ramsar site, Solent and Southampton Water SPA and Ramsar site; as well as the nationally designated Sites of Special Scientific Interest (SSSIs) that underpin these international designations.

The Solent water environment is one of the most important for wildlife in the United Kingdom. It is protected under the Water Environment Regulations and the Conservation of Habitats and Species Regulations 2017 (as amended) as well as through national legislation for many parts of the coastline and adjacent maritime areas. Natural England has confirmed high levels of nitrogen and phosphorus are entering this water environment and that there is sound evidence that this eutrophication is causing excessive growth of plants and algae which reduces oxygen and light levels and is leading to negative effects on the special features for which the European sites are designated. Natural England currently advises that every permission for new dwellings in the [River Test Catchment Area](#) could result in increased nutrients entering the Solent area ([NE776 Edition 5 Nutrient Neutrality and Nutrient Mitigation.pdf](#)) from the increase in waste water and land use change. Accordingly, the Local Planning Authority considers this proposal is likely to lead to significant effects on the European Sites and an Appropriate Assessment (AA) is required.

A bespoke nutrient mitigation strategy to address the increased nitrate burdens is proposed and aligns with the mitigation strategy in place for the Hampshire Avon catchment. Therefore please

see the comments above which are also pertinent to the Solent and must be addressed prior to determination.

BNG

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.

An updated statutory metric calculation (BNG Assessment. August 2025. Andy Warren) confirming the baseline and predicted post- development biodiversity units of the site has been submitted.

On-site pre-development (baseline) biodiversity value	58.71 Habitat units
	8.73 Hedgerow units
	4.64 Watercourse units
Are there any irreplaceable habitats on-site?	Yes
Has any habitat degradation occurred?	No

The current baseline is not accepted. Condition assessment sheets have not been submitted in support of the application, excepting those included within the botanical survey report. This information is a minimum requirement set out in Article 7 of The Town and Country Planning (Development Management Procedure) (England) Order 2015 and must therefore be submitted for review by the ecology team prior to determination.

The BNG mapping has also not been updated and does not reflect the changes in habitat assessment since the additional botanical surveys were carried out.

The updated metric submitted also demonstrates the following metric errors which must be addressed prior to determination, these include;

- there is a net loss of very high distinctiveness area habitat (lowland meadow) and the BNG trading rules do not permit any net loss of very high distinctiveness area habitats.
- There are net losses of medium distinctiveness area habitats in 1 broad habitat group and too few gains at higher distinctiveness categories to offset these losses. The broad habitat group concerned is grassland which loses 7.05BU from other neutral grassland
- There are too many net losses of low distinctiveness area habitats and too few gains at higher distinctiveness categories to offset these losses. The net change of low distinctiveness area habitats is 0.052BU
- There are too many net losses of medium distinctiveness hedgerows and too few gains at higher distinctiveness categories to offset these losses. The net change of medium distinctiveness hedgerows is -0.16BU

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. Many of the special features of the New Forest protected sites afforded protection are vulnerable to adverse effects associated with an increase in recreation as demonstrated in Natural England's supplementary advice issued for the SPA on 19 March 2019 and for the SAC on 18 March 2019.

Following a Cabinet decision on 7 May 2024, Wiltshire Council's "Interim recreation mitigation strategy for the New Forest internationally protected sites" (Version 1.1, 21 March 2023) is being revised. Cabinet approved revised mitigation measures to manage recreational pressures on the New Forest protected sites, including the cessation of use of Community Infrastructure Levy (CIL) to fund Strategic Access Management and Monitoring (SAMM) measures for minor residential development (1-49 dwellings) and tourism / visitor accommodation within the 13.8km zone of influence. Instead, SAMM measures are to be funded by developer contributions at a rate of £600 (plus legal and admin fees) per unit of residential or tourism accommodation. This revision applies to all development that will result in a net increase in accommodation units within the 13.8km zone of influence from the New Forest protected sites and therefore applies to this application. Evidence for the revised approach derives from the New Forest SAMM Report (Footprint Ecology, October 2023) which can be found here: [Research into recreational use of the New Forest's protected habitats - New Forest National Park Authority \(newforestnpa.gov.uk\)](https://www.newforestnpa.gov.uk/research-into-recreational-use-of-the-new-forest-protected-habitats). The New Forest SAMM Report was commissioned by all the local planning authorities with areas lying within the 13.8km zone, in order to identify and implement a consistent strategic approach to mitigation across the zone of influence.

It will therefore be necessary for developer contributions of £600 per dwelling / tourism unit (plus legal and admin fees) to be secured via s111 agreement, unilateral undertaking or s106 agreement for this application 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 applicant should be directed to the Guidance Note for Completing Agreements Under S.111 of the Local Government Act 1972.

Final sign off – all matters addressed:

Ecologist Jenna Buss	Date
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