

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name: **Abi Gazzard, Wiltshire Council**

Date: 30/03/2026

Application No:	PL/2026/00829
Proposal:	Erection of two of semi-detached dwellings and associated garages following earlier demolition of existing dwelling
Site Address:	5 Pretoria Road Ludgershall, SP11 9PB
Case Officer:	Alex Edge

The following AA has been sent to NE for comment. The application must not be determined until favourable comments have been received from NE, who must respond within 21 days.

Habitat Regulations Assessment - Likely Significant Effects Test

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

WCS policy CP50 (Biodiversity and Geodiversity) and the NPPF requires the Local Planning Authority to ensure protection of important habitats and species in relation to development and seeks enhancement for the benefit of biodiversity through the planning system. Whilst the application site is not adjacent to any rivers or in any respective flood zones, it is situated within the River Test catchment which drains into the Solent. 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), Portsmouth Harbour SPA, Solent and Southampton Water SPA; 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. These nutrient inputs mostly come either from agricultural sources or from wastewater from existing housing and other development.

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 ([Guidance dated June 2020](#)). Nutrients are generated by the new people in the housing (nutrients enter the water environment via wastewater discharges), and from their activities and pets. Nutrients can move to designated sites by streams, rivers or through the groundwater.

Accordingly, the Local Planning Authority considers this proposal, in combination with other developments, is likely to lead to significant effects on the European Sites and this is considered within the Appropriate Assessment (AA).

Habitat Regulations Assessment - Appropriate Assessment

Nitrogen burden

In line with Natural England's Advice on Nutrient Neutrality a calculation of the nitrogen burdens has been completed by the applicant for the proposal and approved by Wiltshire Council (see Appendix A).

This has confirmed that a nitrogen burden of 3.41kg/TN/yr (pre-2030) will result and mitigation is required to ensure there are no adverse effects on the integrity of the Solent protected sites.

Mitigation scheme

Natural England has advised that permanent land use change by converting agricultural land with higher nitrogen loading to alternative uses with lower nitrogen loading, such as for local communities and wildlife is one way of neutralising nutrient burdens from development.

A Council led strategic mitigation scheme is available to help development in Wiltshire achieve nitrogen neutrality. In 2021 the Council permanently removed an intensively managed (~120 hectare) dairy farm (a high nitrogen input use) on Council land located at Roundbarrow Farm near Pitton, east of Salisbury and will convert the land to a (low nitrogen input) nature reserve. The proposal for the long-term management of the land is to restore the land to chalk grassland, lowland meadow with some areas of natural regeneration and woodland planting for ecological connectivity. This approach has been discussed with Natural England.

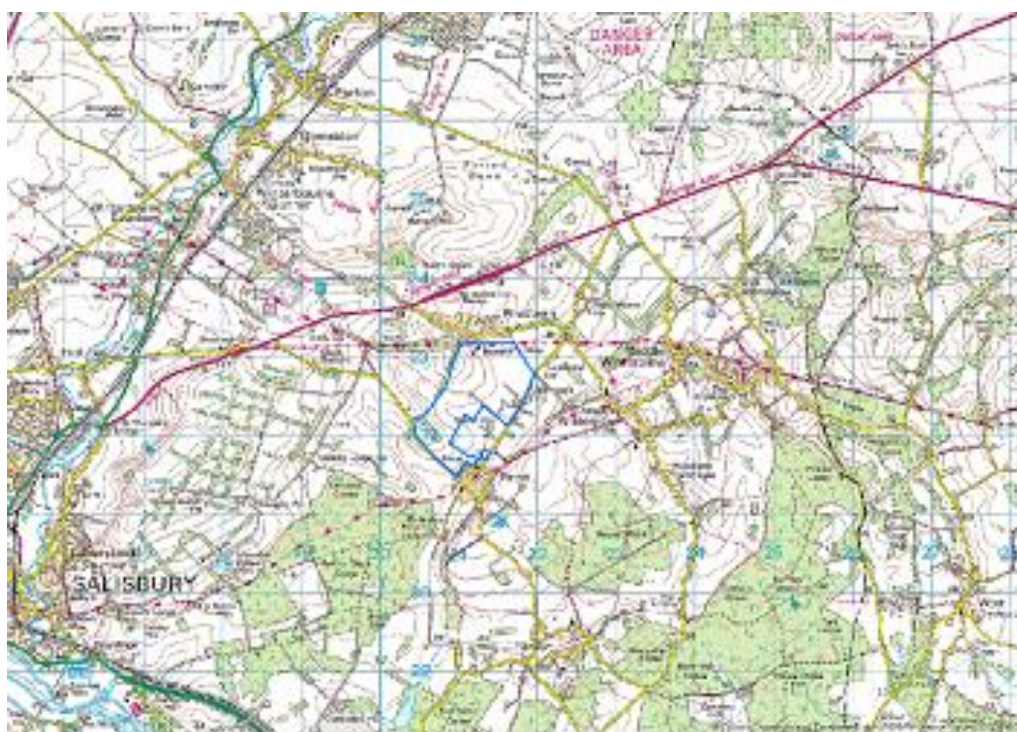


Figure 1 Round Barrow Farm in Wiltshire Council ownership

The farm is within the River Test catchment, near a tributary of the River Dunn which drains into the River Test (Figure 2). A hydrogeological assessment¹ has been undertaken of the farmland to assess its suitability as mitigation for development in Wiltshire. Based on groundwater contribution, a reduction in nutrient contributions could be realised in the River Test in less than a year following the cessation of the site as a dairy farm.

¹ Nutrient neutrality – Hydrological Appraisal for a site at Pitton in Wiltshire, H2Ogeo, Jan 2022 (20210615P1)

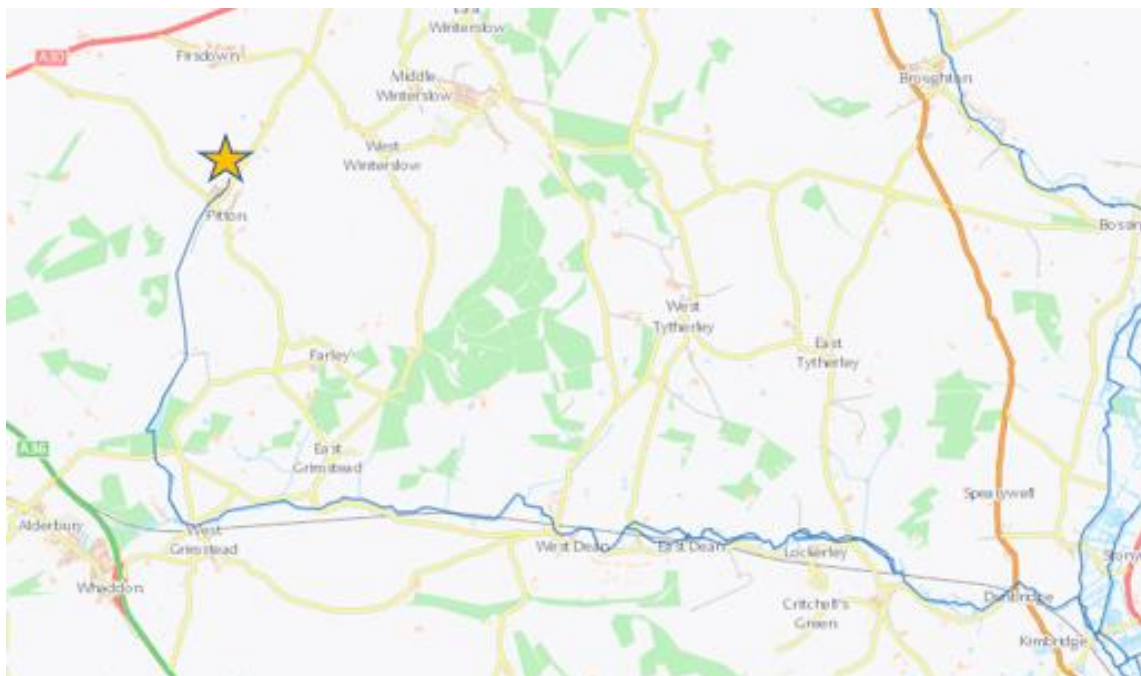


Figure 2 Location of Round Barrow Farm and Main River Designation (Environment Agency, 2021)

Natural England's Nitrogen Neutrality advice¹ includes evidence of nitrogen leaching rate for dairy farms within the Solent catchment. The leaching rate for Roundbarrow Farm is at 35.34 kg/TN/ha. Nature Reserves have a nitrogen leaching rate of 3 kg/N/yr. The applicant has agreed to use the Council led scheme to achieve nitrogen neutrality. Figure 3 shows the area of mitigation land required for this proposal.

Nitrogen budget	Area of mitigation land required
6.82 kg/N/yr	0.21 ha (6.82/32.34)

Figure 3 – Mitigation area required

The mitigation site has capacity for both existing planned developments and anticipated local plan growth in the River Test catchment. Wiltshire Council will maintain up-to-date records and tracking of the developments that are using the scheme.

Financial contributions to the mitigation scheme will be secured to cover the level of mitigation needed to achieve neutrality. This is secured by Unilateral Undertakings or Section 106 agreements at time of permission with contributions secured prior to commencement. Where a Section 106 agreement is not in place, mitigation can alternatively be secured under Section 111. Securing contributions in this way enables the Council as local planning authority to comply with the requirements of Regulation 63 of the Conservation of Habitats and Species Regulations 2017 ("the Habitats Regulations") (as amended) and Core Policy 50 (Biodiversity and Geodiversity) of the Wiltshire Core Strategy ("WCS"). **The cost of Nitrogen credits from the Council's strategic scheme to mitigate the burden would be £9,513.90 (£2790 per 1 kg/N) plus legal fees.**

It is considered that this approach delivers the required level of certainty to secure effective mitigation for the nitrogen burdens of this planning application. There will be no in combination effects with other developments, therefore conclude that there would be no adverse effect on the integrity of the above European sites as a result of the development.

Conditions:

The overnight development hereby approved shall be designed to ensure it does not exceed 110 litres per person per day water consumption levels (which includes external water usage). Within 3

months of each phase being completed and the development brought into use, a post construction stage certificate certifying that this standard has been achieved shall be submitted to the local planning authority for its written approval.

REASON: To ensure that the development will be nutrient neutral.

As well as planning obligation/s.