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Our ref: 541309
Your ref: PL/2026/00843



Joe Richardson
Case Officer
Wiltshire Council

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BY EMAIL ONLY

Dear Mr Richardson,

Planning consultation: Detailed Planning application for the Erection of 9no. dwellings including 4 Affordable Homes with associated infrastructure

Location: Land at Whitlocks, Bishopstone, Wiltshire

Thank you for your consultation on the above dated 13 February 2026.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

No Objection – Subject to securing mitigation

The application site lies within the hydrological catchment of the River Avon SAC and is located in the consultation zone for the New Forest SAC/SPA/Ramsar. European sites are afforded protection under the Conservation of Habitats and Species Regulations 2017, as amended (the 'Habitats Regulations'). In considering the European site interest, Natural England advises that you, as a competent authority under the provisions of the Habitats Regulations, should have regard for any potential impacts that a plan or project may have¹. The [Conservation objectives](#) for each European site explain how the site should be restored and/or maintained and may be helpful in assessing potential impacts.

On the basis of information provided, Natural England's advice is that this proposed development will require mitigation measures intended to avoid or reduce the likely harmful effects on a European site which cannot be taken into account when determining whether or not a plan or project is likely to have a significant effect on a site and requires an appropriate assessment (following the People Over Wind ruling by the Court of Justice of the European Union). For this reason, the proposed mitigation measures need to be formally checked and confirmed by your Authority, as the competent authority, via an Appropriate Assessment.

Habitats Regulations Assessment – Appropriate Assessment

Natural England notes that the Habitats Regulations Assessment (HRA) has not been produced by your authority, but by the applicant. As competent authority, it is your responsibility to produce the

¹ Requirements are set out within Regulations 63 and 64 of the Habitats Regulations, where a series of steps and tests are followed for plans or projects that could potentially affect a European site. The steps and tests set out within Regulations 63 and 64 are commonly referred to as the 'Habitats Regulations Assessment' process.

The Government has produced core guidance for competent authorities and developers to assist with the Habitats Regulations Assessment process. This can be found on the Defra website. <http://www.defra.gov.uk/habitats-review/implementation/process-guidance/guidance/sites/>

HRA and be accountable for its conclusions. Natural England is a statutory consultee on the Appropriate Assessment stage of the Habitats Regulations Assessment process. The following advice is provided to assist your authority to undertake an Appropriate Assessment:

River Avon SAC – Nutrient Neutrality

It is Natural England's view that there is a likely significant effect on the internationally designated sites in the River Avon catchment due to the increase in phosphorus derived from wastewater discharges from new housing within the hydrological catchment of the River Avon, this includes all applications with discharges to ground or surface waters from septic tanks and package treatment plants. Natural England therefore advises that as submitted the application could have a likely significant effect on the River Avon Special Area of Conservation (SAC). Where there is a likelihood of significant effects, or there are uncertainties, a competent authority should undertake an Appropriate Assessment, in order to assess the implications of the proposal in view of the conservation objectives for the European wildlife sites in question.

The scheme lies within the hydrological catchment of the River Avon Special Area of Conservation (SAC). The scheme therefore needs to demonstrate phosphorus neutrality in relation to its sewage discharge and nitrogen neutrality in relation to surface water discharges.

The scheme is supported by a sHRA which includes phosphorus budgets for the scheme. Please note as the Competent Authority it is your responsibility to ensure that you are confident that there is sufficient information to support the values used in the phosphorus calculation, and that the nutrient budget calculation is correct.

In order to achieve phosphorus neutrality, the scheme will install a PTP with a certified treated effluent phosphorus concentration of 0.6mg/TP/l. The scheme also relies on land use change to achieve nutrient neutrality. We note that the nutrient budget has used a water use of 95l per person per day. Natural England would have no objection to this but would require the applicant to demonstrate that the proposals can achieve 85l per person per day, plus a 10l buffer per person per day to account for increased use over time. The proposed water use limit should be appropriately secured with any permission.

New Forest SAC / SPA / Ramsar

The proposed scheme falls within the buffer zone to provide mitigation for the New Forest internationally important sites and thus would be required to provide SAMM contribution in line with the approved New Forest Mitigation strategy. Provided the necessary mitigation is secured, Natural England agrees with the Shadow HRA that the proposals will avoid any adverse impacts on the designated sites.

Priority Habitat – Coastal & Floodplain Grazing Marsh

Natural England is concerned that the scheme may result in the loss of grazed coastal floodplain grassland priority habitat in the area to the south of Broadchalke Road, which is to be used as a sewage treatment discharge field. The requirement to promote the restoration and enhancement of priority habitats and ecological networks is set out in paragraph 192 of the National Planning Policy Framework (NPPF 2024). We further note that the area includes proposed tree planting and would advise your authority to be satisfied that there would be no significant loss of species rich grassland to accommodate the planting.

Please refer to our standard advice regarding priority habitats in Annex A.

Protected Landscapes – Cranborne Chase National Landscape (NL)

Natural England recommends that the Cranborne Chase NL Team is fully consulted over any implications of the proposals on the designated landscape of the NL. Their knowledge of the location and wider landscape setting of the development should help to confirm whether or not it would impact significantly on the purposes of the designation. They will also be able to advise whether the development accords with the aims and policies set out in the NL management plan. Any decision should take full account the NL Team's advice and give the necessary weight to the relevant Cranborne Chase NL Management Plan policies.

Requirement for Construction Environmental Management Plan (CEMP)

A CEMP for the scheme to avoid and mitigate effects on ecological features should be agreed by your Authority prior to commencement of the scheme. This should have particular focus on measures to protect the riparian corridor and to ensure light spill is kept to a minimum.

Requirement for Landscape and Ecological Management Plan (LEMP)

The scheme should provide for the retention and enhancement of habitats the details of which will need to be set out in a LEMP, which should be agreed by your Authority prior to commencement of the scheme.

Further general advice on consideration of protected species and other natural environment issues is provided below at Annex A.

Should the developer wish to discuss the detail of measures to mitigate the effects described above with Natural England, we recommend that they seek advice through our Discretionary Advice Service.

Should the proposal change, please consult us again.

If you have any queries relating to the advice in this letter please contact me directly.

Yours faithfully,

Kyle Conroy
Sustainable Development Higher Officer
Wessex Area Team

Annex A – Additional advice

Natural England offers the following additional advice:

Biodiversity duty

Section 40 of the [Natural Environment and Rural Communities Act 2006 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2006/14/section/40) places a duty on the local planning authority to conserve and enhance biodiversity as part of its decision making. We refer you to the [Complying with the biodiversity duty - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/complying-with-the-biodiversity-duty) for further information.

Designated nature conservation sites

Paragraphs 193-195 of the NPPF set out the principles for determining applications impacting on Sites of Special Scientific Interest (SSSI) and habitats sites (Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). Both the direct and indirect impacts of the development should be considered.

A Habitats Regulations Assessment is needed where a proposal might affect a habitat site (see [Habitats regulations assessments: protecting a European site - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site) and Natural England must be consulted on 'appropriate assessments' (see [Appropriate assessment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/appropriate-assessment) for more information for planning authorities).

Natural England must also be consulted where development is in or likely to affect a SSSI and provides advice on potential impacts on SSSIs either via the [SSSI Impact Risk Zones \(England\) \(arcgis.com\)](https://arcgis.com) or as standard or bespoke consultation responses. Section 28G of the Wildlife and Countryside Act 1981 places a duty on all public bodies to take reasonable steps, consistent with the proper exercise of their functions, to further the conservation and enhancement of the features for which an SSSI has been notified ([Sites of special scientific interest: public body responsibilities - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/sites-of-special-scientific-interest-public-body-responsibilities)).

Protected Species

Natural England has produced [Protected species and development: advice for local planning authorities \(gov.uk\)](https://www.gov.uk/guidance/protected-species-and-development-advice-for-local-planning-authorities) (standing advice) to help planning authorities understand the impact of particular developments on protected species.

Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances. A protected species licence may be required in certain cases. We refer you to [Wildlife licences: when you need to apply - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/wildlife-licences-when-you-need-to-apply) for more information.

Local sites and priority habitats and species

The local planning authority should consider the impacts of the proposed development on any local wildlife or geodiversity site, in line with paragraphs 187, 188 and 192 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity to help nature's recovery. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local environmental records centre, wildlife trust, geoconservation groups or recording societies. Emerging [Local nature recovery strategies - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/local-nature-recovery-strategies) may also provide further useful information.

Those habitats and species which are of particular importance for nature conservation are included as 'priority habitats and species' in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest on the Magic website or as Local Wildlife Sites. We refer you to [Habitats and species of principal importance in England - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/habitats-and-species-of-principal-importance-in-england) for a list of priority habitats and species in England. You should consider priority habitats and species when applying your 'biodiversity duty' to your policy or decision making

Natural England does not routinely hold priority species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. We refer you to the [Brownfield Hub - Buglife](#) for more information and Natural England's [Open Mosaic Habitat \(Draft\) - data.gov.uk](#) (Open Mosaic Habitat inventory), which can be used as the starting point for detailed brownfield land assessments.

Biodiversity and wider environmental gains

Development should provide net gains for biodiversity in line with the NPPF paragraphs 187(d), 192 and 193. Major development (defined in the [National Planning Policy Framework \(publishing.service.gov.uk\)](#) glossary) is required by law to deliver a biodiversity gain of at least 10% from 12 February 2024 and this requirement is expected to be extended to smaller scale development in spring 2024. For nationally significant infrastructure projects (NSIPs), it is anticipated that the requirement for biodiversity net gain will be implemented from 2025.

For further information on the timetable for mandatory biodiversity net gain, we refer you to [Biodiversity Net Gain moves step closer with timetable set out - GOV.UK \(www.gov.uk\)](#). [Biodiversity net gain - GOV.UK \(www.gov.uk\)](#) provides more information on biodiversity net gain and includes a link to the draft [Biodiversity net gain - GOV.UK \(www.gov.uk\)](#) Planning Practice Guidance.

The statutory biodiversity metric should be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. We refer you to [Calculate biodiversity value with the statutory biodiversity metric - GOV.UK \(www.gov.uk\)](#) for more information. For small development sites, [The Small Sites Metric - JP040 \(naturalengland.org.uk\)](#) may be used. This is a simplified version of the statutory biodiversity metric and is designed for use where certain criteria are met.

The mitigation hierarchy as set out in paragraph 193 of the NPPF should be followed to firstly consider what existing habitats within the site can be retained or enhanced. Where on-site measures are not possible, provision off-site will need to be considered.

Where off-site delivery of biodiversity gain is proposed on a special site designated for nature (e.g. a SSSI or habitats site) prior consent or assent may be required from Natural England. More information is available on [Sites of Special Scientific Interest: managing your land](#)

Development also provides opportunities to secure wider biodiversity enhancements and environmental gains, as outlined in the NPPF (paragraphs 8, 77, 109, 125, 187, 188 and 193). Opportunities for enhancement might include incorporating features to support specific species within the design of new buildings such as swift or bat boxes or designing lighting to encourage wildlife.

[The Environmental Benefits from Nature Tool - Beta Test Version - JP038 \(naturalengland.org.uk\)](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory biodiversity metric.

[Natural environment - GOV.UK \(www.gov.uk\)](#) provides further information on biodiversity net gain, the mitigation hierarchy and wider environmental net gain.

Green Infrastructure

For evidence-based advice and tools on how to design, deliver and manage green and blue infrastructure (GI) we refer you to [Green Infrastructure Home \(naturalengland.org.uk\)](#) (the Green Infrastructure Framework). GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales.

Development should be designed to meet the 15 [GI How Principles \(naturalengland.org.uk\)](#). The GI Standards can be used to inform the quality, quantity and type of GI to be provided. Major development should have a GI plan including a long-term delivery and management plan. Relevant aspects of local

authority GI strategies should be delivered where appropriate.

The [Green Infrastructure Map \(naturalengland.org.uk\)](https://naturalengland.org.uk/green-infrastructure-map) and [GI Mapping Analysis \(naturalengland.org.uk\)](https://naturalengland.org.uk/gi-mapping-analysis) are GI mapping resources that can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision.

Access and Recreation:

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths, together with the creation of new footpaths and bridleways should be considered. Links to urban fringe areas should also be explored to strengthen access networks, reduce fragmentation, and promote wider green infrastructure.