

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jenna Buss
Date:	30/04/2026
Application number:	PL/2026/00843
Proposal:	Detailed Planning application for the Erection of 9no. dwellings including 4 Affordable Homes with associated infrastructure
Site address:	Land at Whitlocks, Bishopstone, 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	Nutrient Neutrality	Habitat Regulations	Amended nutrient Neutrality calculator	
2	BNG	Town and Country Planning Act Environment Act	Clarification of the baseline habitats and resubmission of the metric	

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:

- Shadow Habitat Regulation Assessment Screening Report and Appropriate Assessment. February 2026. Nutrient Neutral
- Statutory Biodiversity Metric. January 2026. Paula Richings
- BNG Development Plan
- Landscape masterplan DWG-1835-01. January 2026. W H Landscape
- BNG Baseline Map

- Ecological Appraisal. January 2026. Enims
- Reptile Survey Report. October 2024. Enims
- Proposed Site Plan PL02 B. January 2026. DMW Architects
- Natural England Nutrient Neutrality Calculator for the River Avon SAC

Protected and Notable Species/Habitats

The buildings on site were assessed to have negligible potential to support roosting bats. However, the site is considered to be functionally linked to the wider environment providing good foraging and commuting routes for bats along the boundaries within the woody habitats. Although no surveys have been carried out to date, records for a number of bat species exist in close proximity and therefore the suggested lighting in accordance with Guidance note 08/23: Bats and Artificial Lighting in the UK, is welcomed and should be secured by condition.

Pre commencement surveys for badger are also welcomed and should be included within a CEMP.

The proposed southern parcel lies within Natural England Priority habitat of Coastal and Floodplain Grazing Marsh. This habitat is characterised by ditches of standing water which support rare assemblages of plants and invertebrates and breeding waders. The BNG assessment has assessed the baseline of this habitat as modified grassland, however the species lists have not been provided and it is unclear the extent to which the area was surveyed.

At present, it would appear that the site does not support this priority habitat, however, there are opportunities to enhance the existing habitat within the site by creating ditches or ponds in the area in accordance with BNG, however it appears that the proposal currently consists of neutral grassland and trees. We would advise that in support of the priority habitat designation and CP50 that the species lists for this parcel is submitted in support of the application and that proposals within this area are amended to align with the floodplain grazing marsh characteristics. This would align with Wiltshire Councils LNRS.

It is anticipated that all developments will deliver no net loss of biodiversity. For this application, biodiversity measures should focus on delivering continued ecological functionality for: Swifts/bats/hedgehog/reptiles (delete as appropriate)

It is currently expected that all new developments will provide the ratio of 1:1 feature to building in line with *BS 42021:2022 Integral nest boxes – Selection and installation for new developments*.

All details on exact locations and specifications must be added to all working plans to avoid oversight and to ensure consistency and enforceability. Integrated features are generally maintenance-free and seek to benefit a target species/s or group/s and should demonstrate viability in terms of position on the building, location and clustering in accordance with relevant guidance and the additional features.

Reptile Surveys

Reptile surveys were carried out in September/October 2024. No evidence of reptiles were identified during the surveys however the surveys were not carried out in accordance with best practice. Part of the survey was undertaken outside of the optimum survey window and it would appear surveys were carried out immediately after setting out the refugia with no details provided on the 'bedding in' time.

Reptiles may therefore be present at the site but are unlikely to occur in large numbers due to the lack of any records. The proposed precautionary working method statement is welcomed and

should be secured by condition through a CEMP. It is noted that habitat will be retained on site that would support reptiles post development which is welcomed.

SSSI

The LPA have a duty to consult NE prior to determining a planning application that is in or likely to affect a SSSI (Schedule 4 (w) of The Town and Country Planning (Development Management Procedure) (England) Order 2015 and section 28i of The Wildlife and Countryside Act 1981).

This application lies in close proximity to Throope Down and Knighton Downs and Woods SSSIs

However, given the scale and nature of the proposed works, it is concluded that there is no mechanism for potential effect in this instance.

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.

A nutrient calculation has been submitted however the following issues were identified:

- The proposed PTP is not included on the list of certified PTPs ([List of Certified Small Wastewater Treatment Systems Up to 50PT](#)) accepted by NE. It would appear that this PTP also uses chemical dosing which would require a management and monitoring plan to be submitted in support of its use.
- Water use is proposed to be 95l/p/d, information on how this will be achieved must be submitted in support of the application
- Amendment of current land use as it appears to be used for grazing/agriculture rather than commercial/industrial.
- The proposed SUDS should be amended as discharging to ground is a like for like as the surface water already discharges to ground

The calculation must be amended to address these issues, or suitable justification provided, and resubmitted to the Council for approval. 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.

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.

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.

In line with the Councils Interim Mitigation Strategy, the applicant has agreed to pay the SAMM payment requirements of £660 per dwelling/tourism unit (plus legal and admin fees). This will be

secured via a S111 agreement at determination. Unilateral undertakings or s106 agreements are also available 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 cost of developer contributions to mitigate the burden would be £5940 plus legal and admin fees.

The applicant should be directed to the Guidance Note for Completing Agreements Under S111 of the Local Government Act 1972.

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

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.

A completed statutory metric calculation (Statutory Biodiversity Metric. January 2026. Paula Richings) confirming the baseline and predicted post- development biodiversity units of the site has been submitted (including the condition assessment sheets (if applicable) and maps).

The following issues must be addressed in the baseline prior to determination:

- The metric has not identified any linear features within the baseline, however the Landscape Masterplan states 'existing hedgerow to be enhanced as needed' Clarification is therefore required as to the linear habitat types present on site. Landscape drawings and the metric must align

An area of broad leaved woodland is proposed to be retained within the residential curtilage. Any habitat within the residential curtilage cannot be secured and must be included on the metric as vegetated garden post development. This must be amended prior to submission of the Gain Plan.

As highlighted above, the southern parcel lies within priority habitat of Coastal and Flood Plain Grazing Marsh. The proposed BNG within this parcel does not reflect this habitat type and we would advise this is amended to support this habitat type post development.

Please note that the proposed BNG is currently considered 'significant' due to:

- i. the scale and nature of the application (major) and;
- ii. the BNG proposed (including medium and distinctiveness habitats of neutral grassland, broadleaved woodland and mixed scrub).

A Habitat Management and Monitoring Plan (HMMP) will be required, and should be secured via condition at agreement.

In order for the council to fulfil its BNG monitoring responsibilities, a Biodiversity Net Gain On-site 30 year Monitoring Fee must be secured through a Section 111, Section 106 or Unilateral Undertaking at the time of permission with contributions secured prior to commencement. The

applicant should be directed to the Guidance Note for Completing Agreements Under S.111 of the Local Government Act 1972. Where the applicant elects to use the S111 process the fee must be paid and S111 signed by both the applicant and the council on the granting of planning permission.

In order for the council to fulfil its monitoring obligations, the BNG monitoring fee would be 12,000 plus legal fees payable on commencement of development.

DRAFT CONDITIONS:

The following conditions are likely to be required to support this application once the additional information above has been submitted in support of the application. The following are not exhaustive and are dependent on the additional information provided.

Prior to the commencement of works, including demolition, ground works/excavation, site clearance, vegetation clearance and boundary treatment works, a Construction Environmental Management Plan (CEMP) shall be submitted to the local planning authority for approval in writing. The Plan shall provide details of the avoidance, mitigation and protective measures to be implemented before and during the construction phase, including but not necessarily limited to, the following:

- a) Identification of ecological protection areas/buffer zones and tree root protection areas and details of physical means of protection, e.g. exclusion fencing.
- b) Working method statements for protected/priority species, such as nesting birds and reptiles.
- c) Mitigation strategies already agreed with the local planning authority prior to determination, such as for great crested newts, dormice or bats; this should comprise the pre-construction/construction related elements of strategies only.
- d) Work schedules for activities with specific timing requirements in order to avoid/reduce potential harm to ecological receptors; including details of when a licensed ecologist and/or ecological clerk of works (ECow) shall be present on site.
- e) Key personnel, responsibilities and contact details (including Site Manager and ecologist/ECow).

Development shall be carried out in strict accordance with the approved CEMP.

licensed REASON: To ensure adequate protection and mitigation for ecological receptors prior to and during construction, and that works are undertaken in line with current best practice and industry standards and are supervised by a suitably and competent professional ecological consultant where applicable CEMP

HMMP

All lighting provided on site shall be in accordance with the appropriate Environmental Zone standards set out by the Institute of Lighting Engineers in their publication GN01:2021, 'Guidance for the Reduction of Obtrusive Light' (ILP, 2021), and Guidance note GN08/23 "Bats and artificial lighting at night", issued by the Bat Conservation Trust and Institution of Lighting Professionals.

REASON: In the interests of the amenities of the area and to minimize impacts on biodiversity caused by light spillage to areas above and outside the development site.

The proposed package treatment plant and drainage field shall be installed, maintained and operated in accordance with the submitted specification and details hereby approved. Any subsequent replacements shall have an equivalent or improved performance specification. The package treatment plant and drainage field shall be installed, connected and available for use before the development is occupied and they shall be maintained and operated thereafter for the lifetime of the development.

REASON: To provide ongoing and adequate nutrient mitigation for the nutrient neutrality water catchment for the life of the development and to ensure that any future package treatment plant is of an equivalent or improved standard.

No development shall commence on site until a Habitat Management and Monitoring Plan (the HMMP), prepared in accordance with the statutory Biodiversity Gain Plan and including:

- a non-technical summary;
- the roles and responsibilities of the people or organisation(s) delivering the HMMP;
- the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the statutory Biodiversity Gain Plan and schedule for implementation;
- the management measures to maintain habitat in accordance with the statutory Biodiversity Gain Plan for a period of 30 years from the completion of development; and
- the monitoring methodology and specification of a Monitoring Pack (to include but not exclusively up to date Management Actions Logs, Habitat Condition Assessment Reports, metric calculation; and corresponding post intervention Habitat Map)

which shall be submitted to the Local Planning Authority in years 2 (two) 5 (five) 10 (ten) 15 (fifteen) 20 (twenty) and 30 (thirty) of the Maintenance Period,
has been submitted to, and approved in writing by, the local planning authority.
The created and/or enhanced habitat shall be managed and maintained in accordance with the statutory HMMP at all times thereafter.
REASON: To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990.

INFORMATIVES:

Nesting Birds

All British birds, their nests and eggs are protected under Section 1 of the Wildlife and Countryside Act 1981 (as amended) and the Countryside and Rights of Way Act 2000 while birds are nesting, building nests and sitting on eggs. The applicant is advised to check any structure or vegetation capable of supporting breeding birds and delay removing or altering such features until after young birds have fledged. Damage to extensive areas that could contain nests/breeding birds should be undertaken outside the breeding season. This season is usually taken to be the period between 1st March and 31st August but some species are known to breed outside these limits.

Bats

There is a low risk that bats may occur at the development site. Many species of bat depend on buildings for roosting, with each having its own preferred type of roost. Most species roost in crevices such as under ridge tiles, behind roofing felt or in cavity walls and are therefore not often seen in the roof space. Bat roosts are protected all times by the Conservation of Habitats and Species 2017 (as amended) even when bats are temporarily absent because, being creatures of habit, they usually return to the same roost site every year. Planning permission for development does not provide a defence against prosecution under this legislation or substitute for the need to obtain a bat licence if an offence is likely. If bats or evidence of bats is found during the works, the applicant is advised to stop work and follow advice from an independent ecologist or the applicant is advised to follow the advice of a professional ecologist or to contact Natural England's Batline through the internet.

Final sign off – all matters addressed:

Ecologist Jenna Buss	Date
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