

Date: 03 July 2026
Our ref: 547947
Your ref: PL/2024/09976



Joe Richardson
Case Officer
Wiltshire Council

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

Dear Mr Richardson,

Planning consultation: Outline planning permission with all matters reserved apart from details of access from Southampton Road, for a residential development of up to 28 dwellings, along with associated public open space, landscaping and biodiversity enhancements and a car park to serve the community allotments

Location: Land off Southampton Road and Junction Road, Alderbury, Wiltshire

Thank you for your consultation on the above dated 01 May 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.

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

New Forest Protected Sites

The 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 recreation mitigation strategy (2022). We note that recreation impacts on the New Forest have been incorrectly screened out of assessment in the submitted shadow HRA. In order to avoid any adverse impacts on the designated sites, the required mitigation as per the strategy must be secured with any permission.

Nutrient Neutrality

The scheme lies within the hydrological catchment of the River Test which drains to the Solent international sites and will be connected to a wastewater treatment works that discharges to the River Avon 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 nutrient neutrality assessment which includes both phosphorus and nitrogen budgets. 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.

Nitrogen Budget – Further information required

There is a minor discrepancy in the total area of the site used in the revised NNAMS (4.9 ha) and the total area of the site as set out in the BNG assessment (4.98 ha). It is important that the calculations

are both accurate and consistent and we recommend that Authority seek clarity on the which figure is correct.

The nitrogen budget for the onsite land use change has used “Greenspace” as the proposed land use for the area of retained lowland meadow. Greenspace has a very low nutrient export rate that would preclude future grazing from the site and thereby reduce management options for the retained areas of priority grassland habitats resulting in further long-term harmful effects. In order to avoid such impacts, the retained meadow areas should be classified in the NNAMS as continuing as a “Lowland Grazing” landuse, which would allow the ongoing management of the retained habitats to include appropriate levels of grazing.

Phosphorus Budget – further information required

To achieve phosphorus neutrality the scheme proposes to purchase credits from the upgrade of a septic tank at Gray Manor Hotel with a more efficient package treatment plant. I can confirm that Natural England has no objection to the principle of this approach, however further information on the suitability of the septic tank to provide nutrient mitigation for the development is required. In particular, the following matters need to be addressed:

- The septic tank to be upgraded for phosphorus mitigation should not meet the published small-scale thresholds.
- Only septic tanks that discharge to water or have good hydrological connectivity should be used to mitigate discharges from the WWTWs. Please note septic tanks that discharge to water will need to use the default PTP discharge rates rather than the default septic tank rate as proposed in the nutrient statement.
- The septic tank upgraded to mitigate impacts on the River Avon SAC must also lie upstream of the Petersfinger WWTWs discharge point.

The phosphorus credits generated by the proposed upgrade should also be agreed with Natural England.

In determining the application your Authority should also be mindful of the need to secure the mitigation measures including:

- Ensuring that the proposed new development is required to limit water use to 110 l per person per day.
- That prior to the commencement of the development that the existing third-party septic tank is upgraded to the model of PTP specified. Please note that any proposed change to the model of the PTP used will affect the nutrient calculations and so would need to be agreed with your authority.
- That a suitable maintenance plan for the new PTP is in place.
- That any future replacement PTP is required to achieve the same effluent phosphorus concentration or better.

The final agreed nutrient mitigation measures should be appropriately secured by any permission.

Lowland Meadow Priority Habitat

The submitted detailed grassland assessment (Lippitt Associates May 2025) classifies 2.066ha of the site as lowland meadow (species rich neutral grassland) priority habitat (Section 41 NERC Act), which represents approximately 48% of grassland habitats on site. Species rich neutral grasslands are now a rare habitat in the UK with most examples surviving as isolated fragmented small stands. In combination with the 0.4ha of purple moor grass and rush pasture priority habitat and mosaic of scrub, trees and other neutral grassland the proposed development site is clearly of high ecological value. The modified scheme has sought to reduce adverse impacts to the site by reducing the development footprint and the total number of housing units. Nevertheless, the scheme as proposed will still result in the loss of a significant area of lowland priority habitat (>2 ha). Further, the layout will result in the fragmentation and isolation of the retained habitats leaving small areas of retained high-quality grassland surrounded by development making appropriate long-term management (e.g. grazing) extremely difficult, while recreational pressures and secondary impacts associated with changes in the

hydrology of the site will lead to further deterioration. It is therefore highly likely that the smaller retained areas to the south of the proposed development footprint will also decline significantly in quality over time. Based on the findings of the grassland assessment it is clear that the current scheme would cause significant harm to existing biodiversity interests.

In determining the application your Authority should be mindful of National Planning Policy Framework paragraph (NPPF) 193 a) which states, “If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused”.

With regard to the availability of alternatives, we note that the scheme is for a relatively modest number of dwellings and that the vast majority of housing development are sited on locations that would not cause significant harm to biodiversity interests. In this case alternative adjacent land is available within the blue line ownership boundary that would appear to have no significant harmful impacts to biodiversity. If such an approach were taken the biodiverse meadow subject to the current application could be maintained and enhanced in its entirety as a local nature reserve. Such an approach would be in conformity with NPPF paragraph 193 and provide substantive ecological and community benefits, in stark contrast to the current proposals.

In order to compensate for the loss of a significant proportion of the meadow the scheme proposes to translocate “suitable lowland meadow turves and / or soils from the affected donor site”. In addition, the grassland interests of the neighbouring field will be enhanced through habitat creation measures (use of green hay and reseeded). Such an approach will not compensate for the loss of an old species rich pasture with varying hydrological characteristics across the site creating grassland community transitions from drier species rich neutral grassland to seasonally damp rush pastures. Further, no information is provided on the suitability of the land for attempting to create new neutral grassland. Given the land’s current agricultural use, it is likely that the soils will have elevated nutrient levels, most notably high phosphorus indices. In such circumstances it is likely to take several years of appropriate management to reduce the field’s soil fertility to a level where a neutral grassland translocation, or habitat creation could realistically be attempted. Natural England therefore advises such compensation measures should be seen as an absolute last resort with the development delayed until such time as the soils in the compensation field are demonstrated to be of sufficiently low fertility to give the compensation scheme the best chances of success. Notwithstanding this advice if your Authority is minded to grant the current scheme the compensatory measures of the loss of the priority grasslands should be agreed with the Wiltshire Council’s ecologists and measures put in place to ensure the compensatory habitats are maintained in appropriate management in perpetuity.

Given the harm to priority habitats that will inevitably result from the proposals and given the opportunities for avoiding losses by meeting the need for additional housing elsewhere, including potentially on adjacent alternative land within the same ownership, **Natural England recommends that the current application be refused.**

Protected Species

The submitted documentation demonstrates that the site supports a diverse range of protected species including dormice, bats and reptiles. This is unsurprising given the known habitats on site and connectivity to valuable off site habitats.

Dormice

The proposed mitigation to retain and enhance woody corridors is welcome. These features should be appropriately managed to enhance the existing habitat for dormice on site and considerations to predation, notably from cats, should be provided. It is noted that the proposed scheme will result in the loss of scrub habitat, which may be suitable dormice habitat. The loss of scrub habitat has not been considered in the mitigation strategy and therefore the scheme will likely lead to a net loss of dormice habitat. Further information should be provided on the loss of dormice habitat compared with the proposed enhancements to ensure no adverse impact on the local dormice population.

Bats

The submitted information demonstrates that the site is used by at least 8 bat species, including

barbastelle bats (Annex II species) likely linked with the Mottisfont Bats SAC, as well as species considered threatened in the UK (e.g. serotine). The information only provides an indication of what species are present on site and detailed survey information is not provided. It is therefore difficult to determine the level of commuting and foraging bat activity on site. It is advised that further information is provided in order to assess the potential impacts and proposed mitigation.

Reptiles

The site is identified as suitable for reptiles with basking and foraging opportunities present. The reptile survey found that populations of slow worms and grass snakes are present across the site. Mitigation is proposed by fencing during construction and translocation to areas outside of the fencing within the red line boundary. The proposals will likely reduce the abundance of suitable reptile habitat and therefore further information is requested to demonstrate that the location, size and habitats of the receptor site can provide sufficient carrying capacity for the local reptile population.

Invertebrate surveys

The submitted mitigation strategy recognises that the site supports a range of invertebrates and pollinators. This is supported by the grassland assessment which showed an abundant and diverse invertebrate population during the botanical survey. Given the mosaic of habitats on site and range of fauna present, and that the scheme is proposing to lose lowland meadow priority habitat, it is recommended that an invertebrate survey is undertaken to more fully understand the importance of the invertebrate population and the impacts of the proposals.

Other Protected Species

Natural England has produced [standing advice](#)¹ to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. The final protected species mitigation strategy should be agreed by your Authority's Ecology Team.

Lighting Strategy

Any permission should ensure construction lighting is avoided and that any necessary lighting during the operational phase avoids light spill on the key habitat receptors including buffers. If any lighting is required then a lighting strategy for the scheme should be agreed by your Authority prior to the commencement of the scheme.

Landscape and Ecological Management Plan (LEMP)

The scheme provides 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.

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. The CEMP should detail how hedgerows and trees will be protected, ensure no impacts on the quality of water courses or bodies and how dust will be controlled during construction.

Should the developer wish to discuss any of the 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

¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

Annex A – Natural England general advice

Wider landscapes

Paragraph 187 of the NPPF highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry-stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape and Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Guidelines for Landscape and Visual Impact Assessment \(GLVIA3\) - Landscape Institute](#) for further guidance.

Biodiversity duty

Section 40 of the [Natural Environment and Rural Communities Act 2006 \(legislation.gov.uk\)](#) 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 \(www.gov.uk\)](#) 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 \(www.gov.uk\)](#) and Natural England must be consulted on 'appropriate assessments' (see [Appropriate assessment - GOV.UK \(www.gov.uk\)](#) 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 \(England\) \(arccis.com\)](#) 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 \(www.gov.uk\)](#)).

Protected Species

Natural England has produced [Protected species and development: advice for local planning authorities \(gov.uk\)](#) (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 \(www.gov.uk\)](#) for more information.

Ancient woodland, ancient and veteran trees

The local planning authority should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 193 of the NPPF. Natural England and the Forestry Commission have produced Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK (www.gov.uk) (standing advice) for planning authorities. It should be considered when determining relevant planning applications.

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/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/priority-habitats-and-species) 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](https://www.buglife.org.uk/) for more information and Natural England's [Open Mosaic Habitat \(Draft\) - data.gov.uk](https://data.gov.uk/open-mosaic-habitat) (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 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/national-planning-policy-framework) glossary) is required by law to deliver a biodiversity gain of at least 10% from 12 February 2024 and this requirement was 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 2026.

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 \(www.gov.uk\)](https://www.gov.uk/biodiversity-net-gain-moves-step-closer-with-timetable-set-out). [Biodiversity net gain - GOV.UK \(www.gov.uk\)](https://www.gov.uk/biodiversity-net-gain) provides more information on biodiversity net gain and includes a link to the draft [Biodiversity net gain - GOV.UK \(www.gov.uk\)](https://www.gov.uk/biodiversity-net-gain) 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 \(www.gov.uk\)](https://www.gov.uk/calculate-biodiversity-value) for more information. For small development sites, [The Small Sites Metric - JP040 \(naturalengland.org.uk\)](https://naturalengland.org.uk/the-small-sites-metric) 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](https://www.gov.uk/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 \(naturalengland.org.uk\)](https://naturalengland.org.uk/the-environmental-benefits-from-nature-tool-beta-test-version) 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 \(www.gov.uk\)](https://www.gov.uk/natural-environment) provides further information on biodiversity net gain, the mitigation hierarchy and wider environmental net gain.