

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jessica Cracknell
Date:	28/07/2026
Application Number:	PL/2026/02691
Proposal:	Temporary rural workers dwelling, associated parking & associated works - retrospective.
Site Address:	Land at White Hill, known as Houndwood Farm, While Hill, Pitton Road, Salisbury, SP5 1DY
Case Officer:	Amy Houldsworth

Recommendations:

☐	No Comment
☐	Support
☐	No objection
☐	Condition (no objection subject to conditions)
☒	Objection - further information required
☐	Objection in principle
☒	HRA.

An Appropriate Assessment for impacts on the New Forest Protected Sites has been completed and sent to Natural England for their agreement that the HRA can be favourably concluded. There is a statutory 21-day response window. The application must not be approved until NE have endorsed the conclusion of the AA.

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date submitted)
1	River Test Catchment <i>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.</i>	NPPF, CP50, Habs Regs	28/07/2026 A completed Natural England Nutrient Neutrality budget Calculator for the River Test Catchment: nutrient neutrality calculators in an unlocked Excel file must be submitted. (see comments in main text)	NO
2	Ecological Impact Assessment (EclA)	Habs Regs, WCA, NPPF, CP50	28/07/2026 An Ecological Assessment has not been submitted in support of this application, assessing the potential impacts on protected habitats and species.	NO

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.

Thank you for your consultation on the above application. I have reviewed the submitted documents against OS maps, aerial photographs of the site and surrounding area, together with GIS layers of statutory and non-statutory designated sites and existing records of protected species.

The following submitted documentation was reviewed to inform this response:

- Natural England Nutrient Neutrality budget calculator for the The Solent Marine Sites;
- Nutrient Statement. 02 July 2026. Holbury Consultancy Service;
- Landscaping Plan. 01 July 2026. Woolley & Wallis. CC/FIE/04;
- Proposed Block Plan. 01 July 2026. Woolley & Wallis. CC/FIE/02;
- Caravan Elevations and Plan. 21 April 2026. Sophie Wilmot;
- Planning, Design & Access Statement. July 2026. Woolley & Wallis.

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 £ 660 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.

River Test Catchment

Solent Protected Sites - 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.

This development falls within the catchment of the River Test which drains into the Solent Protected Sites and has potential to cause adverse effects alone or in combination with other developments through discharge of nitrogen 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.

Nitrogen budget

In line with Natural England's Advice on Nutrient Neutrality, a calculation of the nitrogen burdens of the proposal is required. Natural England has issued guidance and a calculator tool to be used by applicants and this is available here: [Solent: nutrient neutrality calculator - GOV.UK](#)

The development seeks to achieve nutrient neutrality via a bespoke mitigation scheme. 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. A nitrogen budget has been submitted. The nitrogen budget is NOT in line with Natural England's advice. The following issues must be addressed in the submitted budget:

- **The wastewater treatment works has been entered as 'Septic Tank user defined', however the supporting Nutrient Statement states "the mobile home will be served by a Marsh Ensign 6PE Sewage Treatment Plant (STP) that has been installed and is operational and functional." Therefore, the nutrient calculation should be amended to reflect the proposed PTP with the associated PIA certificate in Appendix 1 of the Nutrient Statement.**

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 nitrogen 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.

Until a mitigation scheme has been agreed, it is unlikely that an Appropriate Assessment for this development could conclude with sufficient certainty that there will be no adverse effects on the Solent SACs and SPAs, alone and in-combination with other plans and projects.

Protected Species

An Ecological Assessment has not been submitted in support of this application. In carrying out its statutory function, the LPA must be reasonably sure that the proposal will not result in significant adverse effects on protected habitats or species. The information outlined above must therefore be submitted and reviewed by the LPA's ecology team prior to determination of the application.

It is noted within the Planning, Design & Access Statement that 'Ellendale Ecology have inspected the site and undertaken a walkover survey'. As outlined within the Statement "*The findings confirm that the land is of low ecological value and no notable or protected species were identified during the survey or within historic records.*" The results of the surveys must be submitted to the Local Planning Authority in order for the LPA's ecology team to fully assess the ecological baseline and determine whether the potential impacts of the proposed development on protected habitats and species have been adequately addressed.

Biodiversity Net Gain

From 12 February 2024 Biodiversity Net Gain (BNG) became mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Based on the information available the biodiversity gain planning condition is not considered to apply to this application as the planning application relates to development to which section 73A of the Town and Country Planning Act 1990 (planning permission for development already carried out) applies.

Note to case officer: you should be satisfied that the proposals meet the above criteria and act accordingly. Further information will be required from the applicant prior to determination in the event the application is considered to be subject to mandatory biodiversity net gain.

Core Policy 50

Core Policy 50 of the Wiltshire Core Strategy requires all development to demonstrate no net loss of biodiversity and to seek opportunities to enhance biodiversity. The NPPF also encourages applications to deliver measurable net gains (para 186 d). 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 birds, bats, and hedgehogs.

To provide increased opportunities for biodiversity/fauna/animals it is expected that new developments will provide integral features to benefit biodiversity such as for birds, bats and invertebrates. Integral features must seek to benefit a target species/s or group/s and demonstrate viability in terms of position on building, location and clustering in accordance with relevant guidance.

Insufficient information has been submitted. In carrying out its statutory function, the LPA must be reasonably sure that the proposal will not result in significant adverse effects on protected habitats or species. The information outlined above must therefore be submitted and reviewed by the LPA's ecology team prior to determination of the application. I therefore maintain a holding objection until all the issues listed above have been suitably addressed.

CONDITIONS: these will be added once the issues above have been addressed

Final sign off – all matters addressed:

Ecologist	Date