

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	05/02/2026, 01/04/2026, 03/08/2026
Application number:	PL/2025/10022
Proposal:	Outline application with some reserved matters for the erection of two detached dwellings and garages with access from development to the north (Access and Layout)
Site address:	Land fronting Southwest of Witt Road, Winterslow, Salisbury
Case officer:	Sarah Hill

Recommendations:

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

The Appropriate Assessment (AA) included in these comments for the New Forest protected sites must be sent to Natural England (NE) for their consideration. This will be sent when the AA for the Mottisfont Bats SAC has also been completed, but, at present, further information is required. There is a statutory 21-day response window. The application must not be approved until NE have endorsed the conclusion of the AAs.

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date)
1	Mottisfont Bats SAC	CP50, NPPF, Habs Regs	05/02/2026 -Barbastelle bat mitigation strategy	NO (01/04/2026) NO (03/08/2026)
2.	River Test	CP50, NPPF, Habs Regs	05/02/2026 -Confirmation of land use type, amended budget if appropriate -Confirmation that the applicant wishes to use the council's credit scheme	NO (01/04/2026) NO (03/08/2026)
3.	Mitigation	CP50, NPPF, Habs Regs	05/02/2026 -Ecological Parameters Plan in accordance with the BNG assessment and bat mitigation strategy	NO (01/04/2026) NO (03/08/2026)
4.	BNG	Environment Act 2021, Town and Country Planning Order 2015, CP50	05/02/2026 -Condition assessment sheets -Information regarding habitat degradation	NO (01/04/2026) Partially (03/08/2026)

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 consulting Ecology. I have reviewed the application and supporting documents against OS Maps, aerial photography of the site and surrounding area, together with GIS layers of statutory and non-statutory designated sites and existing records of protected species.

Information considered:

- Ecological Impact Assessment, LC Ecological Services, November 2025
- Statutory Biodiversity Metric, David Caplin, November 2025
- Site Layout Option & Cross Section, Trinity Rose, October 2025
- Natural England Nutrient Neutrality budget calculator for The Solent Marine Sites
- Statutory Biodiversity Metric, David Caplin, November 2025
- Ecology letter, James Genge, LC Ecological Services, March 2026
- Site Layout Option & Cross Section, Trinity Rose, June 2026
- Condition assessment sheets, uploaded 07 May 2026

The site comprises a grassland field with hedgerows, where two detached dwellings are proposed. The site borders further grassland to the south and west, with residential properties to the east and north, and woodland and agricultural fields in the wider landscape.

Thank you for re-consulting Ecology; my second comments are shown in blue. My third comments are shown in red.

COMMENTS:

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. Many of the special features of the New Forest protected sites afforded protection are vulnerable to adverse effects associated with an increase in recreation as demonstrated in Natural England's supplementary advice issued for the SPA on 19 March 2019 and for the SAC on 18 March 2019.

Following a Cabinet decision on 7 May 2024, Wiltshire Council's "Interim recreation mitigation strategy for the New Forest internationally protected sites" (Version 1.1, 21 March 2023) is being revised. Cabinet approved revised mitigation measures to manage recreational pressures on the New Forest protected sites, including the cessation of use of Community Infrastructure Levy (CIL) to fund Strategic Access Management and Monitoring (SAMM) measures for minor residential development (1-49 dwellings) and tourism / visitor accommodation within the 13.8km zone of influence. Instead, SAMM measures are to be funded by developer contributions at a rate of £612 (plus legal fees) per unit of residential or tourism accommodation. This revision applies to all development that will result in a net increase in accommodation units within the 13.8km zone of influence from the New Forest protected sites and therefore applies to this application. Evidence for the revised approach derives from the New Forest SAMM Report (Footprint Ecology, October 2023) which can be found here: [Research into recreational use of the New Forest's protected habitats - New Forest National Park Authority \(newforestnpa.gov.uk\)](https://www.newforestnpa.gov.uk/research-into-recreational-use-of-the-new-forest-protected-habitats).

The New Forest SAMM Report was commissioned by all the local planning authorities with areas lying within the 13.8km zone, in order to identify and implement a consistent strategic approach to mitigation across the zone of influence.

It will therefore be necessary for developer contributions of £612 per dwelling (plus legal fees) to be secured via s111 agreement, unilateral undertaking or s106 agreement for this application 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 applicant should be directed to the Guidance Note for Completing Agreements Under S.111 of the Local Government Act 1972.

Please note that the current contribution for New Forest protected sites mitigation is £660 per dwelling, as per the approved Wiltshire Council Fees and Charges for 2026/27 ([Fees and Charges App B.pdf](#)).

Mottisfont Special Area of Conservation (SAC)

The site lies within the 7.5km Mottisfont Bat SAC buffer and therefore may have potential to result in significant adverse impact on the special features of that site. Appropriate Assessment (AA) under Section 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) 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.

The plot of land adjoining the northern boundary has recently been developed into three dwellings (PL/2022/07116 (outline) and PL/2023/10274 (REM)); it appears that this plot might fall under the same ownership/applicant. At the outline stage, the Ecology Officer requested a bat mitigation strategy, because barbastelle bats had been recorded on-site. It is therefore likely that barbastelles also are/had been present in the current site. Barbastelle bats are the only qualifying feature for this SAC.

For the adjoining site, the Ecology Officer had recommended that a continuous 'dark bat corridor' (e.g. tree and shrub line) along the southern and western boundaries would be appropriate, but, as per recent aerial imagery, there has been an overall loss of bat habitat in the adjoining plot (loss of boundary hedgerow, grassland, scrub etc.). It is not clear whether the bat mitigation strategy was provided, as there is no copy of it available in the files for the outline and REM applications. Further, the ecology report for the current site does not make any reference to this strategy, the Mottisfont SAC, nor potential impacts of the works on barbastelle or the SAC. No bat activity surveys have been undertaken for the current application. **Further information is required to determine the impacts of the proposal on this species including, but not exclusively, a mitigation strategy.** Insufficient information has so far been submitted to enable the AA to be undertaken, which must be completed and the conclusion agreed with Natural England prior to the application being determined.

Thank you for the response letter to the above comments concerning the Mottisfont SAC, which includes details of the two barbastelle passes recorded from the adjoining site and clarifies the habitats now, and formerly, present on site.

Barbastelles are predominantly associated with woodland, but research shows that grassland, field margins, riparian areas, etc. can also form important components of their foraging landscape.

Prior to the development of the adjoining site to the north, this parcel of land is described in the consultant ecologist's letter as "*functionally compris[ing] garden with ornamental hedging*", though also later described as a "*former donkey paddock*". It is acknowledged that much of the current habitat (bare ground and young monoculture hedgerow) is not likely to be of significant value to foraging barbastelles, given that the site is also not well-connected to habitat to the north, east or south. However, as per aerial and streetview imagery, the land directly to the west

comprises grassland and a scrub border. The scrub and grassland links to woodland 50m southwest and 100m west. Further, as above, the fact remains that barbastelles were recorded commuting over the adjoining site on two of three survey occasions in 2022. In the absence of any bat activity surveys presently to demonstrate the absence of barbastelle, it can be assumed that the habitats on or within the vicinity of the site may provide some commuting value. **The assumption of presence should be used to guide on-site mitigation (e.g., appropriate habitat provisions or buffers) as well as a lighting scheme. A plan demonstrating relevant dark corridor/s is required, and will be needed to inform the Appropriate Assessment, alongside a plan showing which habitats will be retained or created.** This information has been requested below, as an Ecological Parameters Plan.

A plan showing dark corridors has not been provided. This could be marked on the revised site layout. The revised site layout appears to show that the most westerly house is now set further back from the site boundary. This amendment is welcomed, but it is unclear what this buffer will comprise (it is shown as a hatched area on the plan, but no key is provided) and whether the habitat will be isolated from the garden by, e.g., fencing. Please could the applicant confirm what habitat is proposed here and whether it will be fenced off from the property (and if so, how it will be managed)?

River Test catchment

This development falls within the River Test catchment which drains into the Solent. This region is protected by a number of international designations and the proposal has the potential for adverse effects alone or in combination to the Solent designated sites (Solent Maritime SAC, Solent and Southampton Water Special Protection Area (SPA)) with other developments through increased nitrogen in the catchment.

In line with Natural England's Advice on Nutrient Neutrality, a calculation of the nitrogen burdens of the proposal is required. A nitrogen budget has been submitted, however, the current land use is entered as "lowland". As per the government's guidance page for nutrient calculators ([Using the nutrient neutrality calculators - GOV.UK](#)), the "lowland" land type comprises "*Agricultural areas on which cattle, sheep and other grazing livestock are farmed. A holding is classified as lowland if 50% or more of its area is classified as a lowland grazing area*". However, the site does not appear to be used agriculturally/for grazing. It comprises a grassland field (with bare ground) that has been recently used as a compound for the adjoining development. **As such, confirmation/evidence of land use type is required.**

Wiltshire Council has a strategic nitrogen mitigation scheme to available to applicants located in the River Test catchment in Wiltshire.

This matter has not been addressed, also as of 03/08/2026.

Ecological Parameters Plan

An Ecological Parameters Plan (EPP) is required. The EPP must clearly identify those areas of the site which are unconstrained, those areas where sensitive design or restrictions may be required, and any areas of the site which are to be retained, remain undeveloped, enhanced, form part of the landscaping for the purposes of protecting and enhancing biodiversity and any areas to be used as compensatory habitat in line with the submitted ecology documents, including the Biodiversity Net Gain Calculator spreadsheet. The EPP will become an 'approved document' of any outline permission granted and any reserved matters application must be in compliance with the plan.

The EPP must include:

1. A scaled drawing showing existing ecological features, distinguishing between those to be retained and those which will be lost e.g. hedgerows, trees, etc.
2. Specify the minimum distance from each feature to the footprint of development e.g. to curtilage of properties, car parks, roads.
3. Specify the buffer distance from light sensitive ecological features where the increase in lux levels will be zero or, if lux contours have been modelled, show contour lines for 1, 0.5 or 0.1 lux depending on the sensitivity of ecological features
4. Identify where new habitats will be created on site, include minimum area in hectares or length in metres and habitat type
5. Identify areas where habitat enhancement will be undertaken, include minimum area in hectares or length in metres and habitat type, e.g. defunct hedgerow to be grubbed up and replanted

This matter has not been addressed, also as of 03/08/2026. An EPP may not be necessary, provided further details of the buffer (as per the revised site plan) are submitted. The buffer should be marked as a dark corridor (i.e., not to be directly illuminated, and where lux levels will remain below a suitable level) and, as above, details of the habitat creation in this buffer area, and any fencing, are required.

Other protected species and habitats

No evidence of badgers was observed, but mammal paths were noted in 2021 on the adjacent site. There are no ponds within 250m, and great crested newts are therefore not considered to be at any significant risk. However, the site provides habitats suitable for use by other protected and notable fauna such as reptiles, nesting birds, and, as above, bats.

The adjacent site had supported a feeding perch (night roost) for brown long-eared bats which would have been lost during the works; it is unclear whether a replacement roost was ultimately provided as part of the development to the north (PL/2022/07116). As mentioned above, barbastelle were also recorded using the adjacent site (as well as serotine, noctule and pipistrelle bats), and since the current site is/was similar in terms of habitats, connectivity and size, it is likely that it has been used by a similar range of commuting and foraging bats. **This should be considered within the EPP.**

A Construction Method Statement should be secured via condition, to ensure the risk posed to the aforementioned species, as well as boundary habitats, is minimised.

In line with the NPPF and with CP50, applications must ensure that no net loss of functional habitat for the benefit of wildlife in the local area will occur as a result of the proposed development. In addition, gains for biodiversity, relevant to local habitats and wildlife populations, should form part of the proposed development. **Biodiversity enhancements should therefore be secured via a condition.** The ecology report's recommendations of hedgehog-accessible garden boundaries, bird nest box and native fruiting trees are welcomed. The enhancements should also include appropriate bat roosting features, bearing in mind the loss of the feeding perch to the north, and loss of potential bat foraging and commuting habitat. Suitable habitat retention/enhancement should be reflected in the EPP, as above.

Biodiversity Net Gain

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 and map (*Ecological Impact Assessment, LC Ecological Services, November 2025; Statutory Biodiversity Metric, David Caplin, November 2025*) stating the baseline and predicted post-development biodiversity units of the site have been submitted:

The pre-development (baseline) situation is summarised below.

On-site pre-development (baseline) biodiversity value	0.83 Habitat units
	0.11 Hedgerow units
	0.00 Watercourse units
Are there any irreplaceable habitats on-site?	No
Has any habitat degradation of occurred?	Yes

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

Condition assessments: The condition assessment sheets for the baseline habitats have not been submitted. This information is a minimum requirement set out in Article 7 of The Town and Country Planning (Development Management Procedure) (England) Order 2015 and must therefore be submitted for review by the ecology team prior to determination.

Degradation: As per aerial imagery, the site has been degraded over recent years. The ecology report states: “*the site has been heavily degraded by the adjacent construction works*”. It is unclear whether this has been reflected in the BNG metric, and the relevant date has not been provided. Confirmation that the BNG baseline refers to pre-degradation habitats must be provided.

~~This matter has not been addressed.~~

Thank you for providing the condition assessment sheets, which align with the conditions shown in the metric. The condition assessment for the grassland refers to 2022 conditions. It is therefore assumed that the relevant date – with regard to the degradation of the site – is 2022. Please could the applicant confirm the full relevant date, as requested above?

IN SUMMARY: 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: wording to be provided once all issues addressed.

Sign off by WC Ecologist will only be given once ALL outstanding information has been submitted and agreed sufficient.

Ecologist	Date
-----------	------