

Council Planning Consultation Response

ECOLOGY

Officer name:	Elizabeth Burrows, Senior Ecologist
Date:	04/08/2026
Application No:	PL/2025/06176
Proposal:	Change of use from a lawned habitat area and the creation of a water feature that is enhancing the wildlife habitat of a garden that contains has a mixture of lawn, wildflower area, woodland and riparian habitats.
Site Address:	Manor Farm, Allington, Devizes, SN10 3NN
Case Officer:	Helena Carney

Recommendations:

☐	No Comment
☐	Support
☐	No objection
☐	Condition (no objection subject to conditions)
☒	Objection - further information required
☐	Objection in principle
☒	HRA required: River Avon (Hampshire catchment) SAC

Appropriate Assessment with a positive conclusion must be completed and sent to Natural England, who must agree the conclusion (within 21 days) prior to this application being permitted.

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed
1	River Avon (Hampshire catchment) SAC	CP50, NPPF 193. a and b, Habitats Regulations	Impact assessment on qualifying species of the River Avon SAC.	
2	Impacts on protected sites and notable habitats.	CP50, W&C Act.	Impact assessment on qualifying species and features of the River Avon SAC, SSSI and Priority Habitat Rivers.	

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.

Information considered:

- Mr R Oram, Manor Farm, Allington Catchment Impact Report V01. (Smart Land Management and Ecology, 08/04/2025).

Habitats Regulations Assessment: River Avon (Hampshire catchment) Special Area of Conservation

The Environment Agency comments highlight that the River Gog is a chalk headwater which feeds into the River Avon (Hampshire Avon) Special Area of Conservation. Mapping shows the Gog is fed by via various upstream tributaries then connects to the River Avon Site of Special Scientific Interest (SSSI) which lies

approximately 4.5km to the south. This then leads into the River Avon: Hampshire Catchment Special Area of Conservation.

I note that the EA have raised a 'objection in principle' which includes sighting concerns that the sluice represents a barrier to the movement of qualifying fish species of the SAC (salmonids, lamprey and bullhead). Image 5 in the Catchment Impact Report demonstrates that the sluice is very likely to represent a barrier to the movement of fish species when it is closed.

The Catchment Impact Report does not identify the hydrological connection of the River Gog to the River Avon SAC or consider the impact of the development on the qualifying species of the River Avon SAC. Consequently, the report does not provide the information required to assess the impact of the development and sluice on the movement of the SACs qualifying species up and down stream.

The development is hydrologically connected to the statutorily designated River Avon (Hampshire catchment) Special Area of Conservation and therefore has 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.

Insufficient information has so far been submitted to enable the AA to be undertaken, which must be reach a positive conclusion and the conclusion agreed with Natural England prior to the application being determined.

Core Policy 50

The submitted report and site visit photos show The Gog natural either side of the pond to be natural or near and indicating that the section impacted by the pond may have been representative of the Priority Habitat 'Rivers' the definition of which encompasses all natural and near-natural running waters. As such the pond may have resulted in the loss of up to 35m of this priority habitat. The submitted Catchment Impact Report does not consider the impacts on the Priority Habitat Rivers or the protected or notable species it may support.

The Gog is hydrologically connected to the River Avon Site of Special Scientific Interest (SSSI) and River Avon SAC. The submitted Catchment Impact Report does not consider the impacts on the qualifying features of these designated sites.

The Catchment Report submitted in support of this application contains insufficient information to determine potential impacts on the following habitats and protected/ notable species: qualifying features of the River Avon SAC, SSS, Priority

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. An ecological impact assessment must therefore be submitted and reviewed by the LPA's ecology team prior to determination of the application.

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.

CONDITIONS:

To be provided once the information requested has been submitted.

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

Ecologist	Date

