

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jenna Buss
Date:	30/04/2026 02/09/2026
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	No
2	BNG	Town and Country Planning Act Environment Act	Clarification of the baseline habitats and resubmission of the metric	Yes Statutory Biodiversity Metric. May 2026. Paula Richings

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. May 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 E. June 2026. DMW Architects](#)
- [Nutrient Neutral Response to ecologist comments on proposed development at Bishopstone. June 2026. Nutrient Neutral](#)
- [Habitat Management and Monitoring Plan. June 2026. ENIMS Ltd](#)
- [Botanical Survey and Assessment of meadow at Bishopstone. May 2026. Ilex Ecology](#)
- [Post Development Habitats EC1973-DR-PH-05](#)
- [Baseline Habitats EC1973-DR-BH-04](#)

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.

Nesting birds may also be impacted by the proposals, measures to minimise these impacts must be included within the CEMP to be secured by condition. Opportunities for nesting birds within the building design in the form of bird boxes has also been proposed within the ecology report which should be included within the building design and 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 Botanical Survey of the meadow at Bishopstone is welcomed with the grassland assessed as Coastal and Floodplain Grazing Marsh in poor condition.](#)

[The grassland is proposed to be enhanced with the inclusion of a shallow scrape in the southern area to provide surface water features characteristic of this habitat type. This is welcomed and the details of the management and monitoring of this habitat parcel will be required within the HMMP which can be secured by condition.](#)

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 as no reptiles were identified. 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 budget calculation has been submitted, which is welcomed; however, the Council requires the completed Excel calculator rather than a PDF version appended to the Nutrient Neutrality Assessment.

It is noted that the post-development surface water runoff calculation uses the Modified Rational Method (MRM). However, it is unclear why the same methodology has not been applied to the existing baseline runoff, as this may result in an inconsistent comparison between the pre- and post-development scenarios. Applying different methodologies could affect the accuracy of the calculated nutrient reduction and may not represent a like-for-like assessment.

While it is acknowledged that post-development runoff may sometimes be modelled in greater detail to reflect proposed SuDS performance, no justification has been provided to support this approach in the submitted calculation. The applicant should therefore clarify:

- Why the MRM has not been applied to the baseline scenario;
- Whether this approach accords with the relevant Natural England calculator guidance; and
- Whether the methodology has been agreed with Natural England

This information is required to ensure that the nutrient burden has been calculated robustly and can be relied upon in the determination of the application.

In addition, Wiltshire Council would not accept the reliance on a water efficiency figure of 85 l/person/day or 95l/p/d with the 10% buffer solely as a future design aspiration where the nutrient neutrality calculations have been informed by a reduced wastewater burden. Whilst the applicant states that the development will be designed to achieve this standard through the specification of water-efficient fixtures and fittings, insufficient information has been provided at this stage to demonstrate how the target will be achieved in practice, whether it is realistically deliverable across all dwellings, and how the calculated nutrient burden can therefore be relied upon.

The Council requires additional information prior to determination setting out the proposed water efficiency strategy, including the measures to be incorporated into the development and evidence demonstrating that the stated consumption rate can be achieved. Furthermore, any water efficiency measures relied upon to reduce the nutrient budget must be capable of being secured and maintained in perpetuity. Reliance on removable fixtures and fittings alone would not provide

sufficient certainty, as such features could be altered or removed by future occupiers, undermining the assumptions used within the nutrient neutrality assessment. Accordingly, the applicant must demonstrate that the proposed water efficiency standard will be secured through permanent design measures and robust planning mechanisms to ensure the nutrient calculations remain valid for the lifetime of the development. If this is not possible then we would advise that the calculator is amended to read 110 l/p/d.

Whilst we welcome the Shadow HRA submitted in support of the application, further information is required to substantiate the nutrient neutrality assessment and confirm the robustness of the calculated nutrient burden. Without this information, the competent authority cannot ascertain that there would be no adverse effect on the integrity of the River Avon SAC and, as such, a favourable Appropriate Assessment cannot currently be reached.

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. May 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).

Information in the completed on-site baseline habitat tabs is accepted as accurate based on the information submitted. The pre-development (baseline) situation is summarised below.

On-site	pre-development	(baseline)	4.72 Habitat units
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biodiversity value	1.09 Hedgerow units
	0.00 Watercourse units
Are there any <u>irreplaceable</u> habitats on-site?	No
Has any habitat <u>degradation</u> of occurred?	No

The Biodiversity Gain Plan must be accompanied by a completed Biodiversity Metric with the following issues addressed:

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.

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.

Final sign off – all matters addressed:

Ecologist Jenna Buss	Date
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