



**Hampshire &  
Isle of Wight**  
Wildlife Trust

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Hampshire  
SO32 2DP

01489 774400

04/02/2026

Dear Sir/Madam,

**24/00349/OUT | Outline planning application for up to 235 homes (use class C3); a Convenience Store (use class E); vehicular access from Aldermaston Road (A340), and the provision of; cycle and pedestrian access, open space, landscaping, SuDS, and other associated infrastructure.**

Further to our letter of April 2024, the Hampshire & Isle of Wight Wildlife Trust maintains its **Objection**. Subsequent consultee & applicant information strengthens the case that this proposal conflicts with current adopted & emerging policy. HIWWT maintains that this proposal would constitute significant damage to on-site and surrounding areas of high biodiversity importance, with consequential impacts to the local ecological network and published Local Nature Recovery Strategy.

#### **Failure to Properly Assess Recreational Impact on Pamber Forest SSSI**

We consider there to be an absence of a robust assessment of recreational pressure on Pamber Forest Nature Reserve (SSSI) and other adjacent statutory nature conservation sites.

Further evidence is required on the assessment of potential impacts on these SSSIs, specifically in relation to increased recreational pressures, together with clear evidence that appropriate and secured mitigation has been put in place to address these impacts. At present, this information is not provided or demonstrated that impacts can be avoided.

The scale of development proposed would introduce a significant number of residents immediately adjacent to these sensitive protected sites. Recreational pressures arising from a population increase of this magnitude are highly likely to increase use of the SSSI network (managed by HIWWT) and could damage the very interest features for which the sites have been notified. These impacts may include disturbance to protected species, trampling of vegetation, path widening and erosion, soil compaction, dog-related impacts, and degradation of woodland ground flora.

Recreational disturbance is a well-established pathway for harm to sensitive woodland SSSIs. The provision of on-site open space does not remove this pressure; developments of this scale routinely generate off-site recreational use, particularly where high-quality semi-natural sites such as Pamber Forest lie directly adjacent.

We note how Natural England has engaged with the applicant through a Discretionary Advice Service (DAS), which we consider has been a mechanism to resolve statutory oversight from NE. In a meeting between the applicant and NE on 19th September 2025, we note the applicant's report on how they have assessed recreational footfall into Pamber Forest. An inferred and highly subjective assessment on the

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future increase of footfall into Pamber Forest is given. We do not consider this to be robust and lacks applied experience of managing nature reserves or sensitive countryside sites. There has been no consultation with HIWWT from Basingstoke and Deane BC, who we manage the land on behalf of, or NE to better understand and assess future recreational impacts.

In the absence of a quantified recreational impact assessment and a clearly secured mitigation strategy, the authority or NE cannot conclude that the proposal would avoid harm to a statutory designated site. This is contrary to the precautionary principle and fails to demonstrate compliance with Policy EM4.

### **Harm to Ancient Woodland and SINC (Irreplaceable Habitat)**

Consultee information highlights unresolved concerns regarding impacts on Sites of Importance for Nature Conservation (SINCs) and ancient woodland, which is an irreplaceable habitat and which also form part of the local, contiguous ecological network and LNRS.

Outstanding issues include:

- Potential deterioration of ancient woodland within Skates Lane SINC
- Insufficient buffering to protect Skates Farm Meadows SINC
- Risk of adverse hydrological effects on SINCs arising from the proposed SuDS strategy
- Lack of clear long-term management proposals for affected SINCs

Ancient woodland is explicitly recognised in national policy as an irreplaceable habitat, where loss or deterioration should be wholly exceptional. The application does not demonstrate how impacts will be avoided, which places the proposal in direct conflict with Policy EM4.

### **Conflict with Emerging Basingstoke and Deane Local Plan (Regulation 18)**

Despite having been allocated in the draft Reg 18 (SPS5.16), the Council's own evidence base for the emerging Local Plan previously concluded that this site was not suitable for allocation due to sustainability, biodiversity and environmental constraints. Although draft allocation wording refers to the need to consider impacts on the SSSI and other ecological features, this application does not demonstrate that these matters have been adequately addressed, particularly in relation to recreational impacts on Pamber Forest SSSI.

Approving the proposal in the absence of robust ecological assessment would therefore be inconsistent with the Council's own evidence-led conclusions and would undermine the plan-led approach to sustainable development.

### **Conflict with the Hampshire Local Nature Recovery Strategy (LNRS)**

The recently published Hampshire Local Nature Recovery Strategy (LNRS) should guide where development should not take place in order to avoid severance of landscapes and ecological corridors. Conversely it should also guide where opportunities are seized for nature recovery. A large proportion of the Skates Lane site (SPS5.16) is identified within the LNRS as an Area That Could Become of Particular Importance for Biodiversity (ACB).

ACBs have been identified because of their importance (sometimes integral) to maintaining ecological integrity and the functional connectivity of the natural landscape. These areas support species movement, habitat resilience, and landscape-scale nature recovery.

Development of this site would therefore remove or degrade land identified as strategically important to future habitat restoration and connectivity between designated sites, including Pamber Forest. This strategic function cannot be replaced through on-site landscaping or standard Biodiversity Net Gain measures, which do not fully capture landscape-scale ecological processes.

There is also a significant risk that granting permission now would bypass an LNRS-led approach, undermining the ability of the emerging Local Plan to align site selection with identified environmental limits, to address cumulative ecological effects at a strategic level and make best use of spatial opportunity.

The proposal is therefore in conflict with the objectives of the LNRS and with Policy EM4, which requires protection and enhancement of the wider ecological network.

### **Hydrology, Water Environment and Flood Risk**

Our comments of April 2024 stand. We also believe there remains an outstanding objection from the Environment Agency on flood risk. In addition, concerns have been raised about hydrological changes affecting adjacent SINCs and watercourses, including with regards to water quality.

These hydrological impacts are directly linked to ecological harm, particularly to wet woodland, pasture and associated species. Approving development while flood risk and water environment impacts remain unresolved would be contrary to environmental protection policies and risk future problems within the local and surrounding landscape.

### **Conclusion**

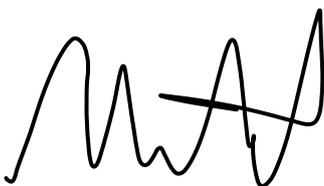
Hampshire & Isle of Wight Wildlife Trust does not consider that key environmental impacts have been properly assessed. Important, material environmental features remain at risk and the ability for HIWWT to adapt on its estate has been dismissed.

In the absence of robust evidence demonstrating no unacceptable harm, the authority cannot reasonably conclude that the proposal complies with Policy EM4 or with the Council's own emerging plan and nature recovery strategy.

For these reasons, The Trust maintains its **objection**.

The above advice is given based on the information made available at this time and may change should further or amended details be submitted. We trust that you will find our comments helpful and if you wish to discuss these matters further, please do not hesitate to do so. I also ask that you keep the Trust informed of the progress and outcome of this application.

Yours Sincerely,



Martin de Retuerto  
Director of Nature Recovery

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