



**Hampshire &
Isle of Wight
Wildlife Trust**

Beechcroft House
Vicarage Lane
Curdrige
Hampshire
SO32 2DP
01489 774400

Miguel Martinez
Planning and Building Control
Hart District Council
Harlington Way
Fleet
GU51 4AE

To: planningadmin@hart.gov.uk

16/03/2026

Dear Mr Martinez,

Re: 26/00145/OUT Hybrid Planning Application for residential-led development seeking: Outline planning permission for construction of up to 169 residential dwellings (Phase 2), provision of public open space, pedestrian links and other associated works with principle. Only access to be considered (layout, scale, appearance and landscape for subsequent determination- reserved matters); and Full planning permission for Phase 1 for the construction of 131 residential dwellings, provision of a 10ha SANG and access from Firgrove Road

Hampshire and Isle of Wight Wildlife Trust **objects** to the proposed development on the grounds of insufficient and incomplete information supplied to assess the environmental and ecological impact on nationally and locally important wildlife sites, offsite impacts on our estate and protected species and consequential impacts on the Thames Basin Heaths Special Protection Area (SPA).

Landscape Context

This application is adjacent to sites of national and local ecological importance, including Castle Bottom National Nature Reserve (NNR) and Castle Bottom to Yateley and Hawley Commons Site of Special Scientific Interest (SSSI), which both form part of the Thames Basin Heath SPA located to the southern boundary of the site. The Thames Basin Heaths SPA covers an area of 8,275 ha across Hampshire and is part of a complex of heathlands in Southern England that support important populations of breeding birds, including the Dartford Warbler, Nightjar and Woodlark.

Other European designations that could be impacted by the proposal are Thursley, Ash, Pirbright and Chobham SAC (10.4km to the east) and Windsor Forest and Great Park SAC (15.2km to the east).

The Hampshire & Isle of Wight Wildlife Trust is a partner in the Thames Basin Heaths Partnership, and supports the management of the MOD site, Yateley Common South within the Thames Basin Heaths SPA area.

Within the site boundaries and along the Eastern border of the site are identified as Areas that Could Become of Particular Importance to Biodiversity (ACB) in the Local Nature Recovery Strategy (LNRS). The LNRS is a material consideration in planning decisions, therefore the identification of this site within the Strategy must be taken into account. Given the location of the site, this nature corridor is essential for supporting the local ecological network.

Recreation and Suitable Alternative Natural Greenspace (SANG)

As evidenced by the applicant's Habitats Regulations Assessment, given the proximity of the Thames Basin Heaths SPA, the residential development could result in significant recreational pressure prior to mitigation. The proposal adheres to the minimum requirement of the 400m exclusion zone due to the high risk of severe impact on the SPA. However, the site is located within 5km (the identified zone of influence in regard to recreational pressure) of this designation and as such it is considered that an increase in recreational pressure could result in increased visitor numbers, leading to disturbance of wildlife, damage to habitats and erosion of access infrastructure. To comply with Policy NBE3 in Hart District Local Plan, it is essential that mitigation measures are delivered prior to or perpetuity to development works to avoid potential adverse effects on the Thames Basin Heaths SPA which may arise from recreational pressure.

At present, recreational disturbance has not been adequately assessed. We do not believe the SANG design will act as an attractive alternative to the Thames Basin Heaths, especially given there is an existing PROW (in the form of a bridlepath) which leads through the proposed SANG and connects to the SPA at the south-eastern corner of the site. We believe this will not only fail to divert recreational pressure from the Thames Basin Heaths SPA, but facilitate additional pressure, given the proposal of up to 300 residential dwellings.

Recreational pressures will impact the Hampshire and Isle of Wight Wildlife Trust estate, intensifying habitat degradation while increasing management costs. The Trust manages several MOD sites, including Yateley Common South (SSSI; SPA), Ancells Farm Nature Reserve (SSSI) and Foxlease Meadow (SSSI). The Trust also manages nature reserves in nearby Hook, which are likely to experience increased footfall and recreational disturbance as a result of the proposed development. Hook Common and



**Hampshire &
Isle of Wight
Wildlife Trust**

Bartley Heath, North Warnborough Greens Nature Reserve and Greywell Moors Nature Reserve. This is likely to result in degradation of sensitive nationally important habitats and an increased burden on the Trust to absorb footfall. Therefore, we object to the proposed development on the grounds of insufficient and incomplete information as the applicant has not fully assessed offsite impacts onto our estate.

As referenced by Natural England, the existing SANG is not currently compliant with Natural England's SANG Guidelines (2021) and the Habitats Regulations Assessment (HRA) has not been produced by your authority, but by the applicant. Additionally, there is no reference to an Environmental Impact Assessment, despite requested. Without assurance from these documents, the Trust has concerns about the potential adverse effects on these areas of statutory designation and ecological importance.

The Trust's capital works programme and heathland restoration could be impacted by this development, resulting in increased management costs, alongside the consequential impacts to the local wildlife, ecological networks and local nature recovery.

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.

Best regards,

Niamh Tickner

Planning, Policy and Campaigns Officer