Hampshire & Isle of Wight Wildlife Trust

Beechcroft House
Vicarage Lane
Curdridge
Hampshire
SO32 2DP

01489 774400

Land at Lodge Farm, Hook Road, North Warnborough (Pre-Application Consultation)

Dear Sir/Madam,

Re: Land at Lodge Farm, Hook Road, North Warnborough - Pre-Application Consultation Response

Hampshire & Isle of Wight Wildlife Trust is an independent charity founded in 1961 and together with 46 others we are part of The Wildlife Trusts, the largest grass roots nature conservation federation in the UK with 900,000 members. Locally across Hampshire and the Isle of Wight we have over 29,500 members and we currently manage 5,000 hectares of land for wildlife, primarily nature reserves of local, national and international importance.

Having reviewed the emerging proposals for development at Lodge Farm, Hampshire & Isle of Wight Wildlife Trust maintains its **objection** in principle to the development of this site. While the proposals are at a pre-application stage, the information currently presented fails to demonstrate how development of this scale can be delivered without significant adverse effects on designated sites, ecological connectivity, nature recovery ambitions and the wider river Whitewater catchment.

The Trust's position is reinforced by the shortcomings identified in earlier consultation responses. The previous scheme failed to provide sufficient ecological, drainage and masterplanning detail to demonstrate how impacts on neighbouring wildlife sites, protected and priority species, adjacent nature reserves and the wider Whitewater catchment would be avoided, mitigated or compensated. In the absence of evidence from an Environmental Statement, Ecological Impact Assessment, Flood Risk Assessment and Drainage Strategy, the Trust continues to oppose the development in principle and considers that any future application must first demonstrate, through robust and site-specific assessment, that harm to designated sites, ecological networks, water quality and nature recovery objectives can be avoided.

The site occupies a strategically important location within a landscape that supports a network of nationally and locally important wildlife sites, including Hook Common and Bartley Heath SSSI, Bartley Heath SINC, the river Whitewater SINC and wider river catchment. The site also lies within an area of significant opportunity for habitat restoration and ecological connectivity which is likely to be integral to the delivery of the Local Nature Recovery Strategy (LNRS).

Landscape-Scale Ecological Connectivity and the Local Nature Recovery Strategy

The Trust is particularly concerned by the location of the site within a landscape that already suffers from substantial habitat fragmentation caused by the M3 motorway, industrial development and associated infrastructure.

The river Whitewater SINC forms one of the most important ecological corridors within Hart District and directly borders the proposed development area. The site also adjoins Bartley Heath SINC and sits within a wider network of APIB and ACB areas that provide opportunities to strengthen habitat connectivity between Hook Common and Bartley

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Heath SSSI, Odiham Common SSSI, Butterwood SSSI, Warnborough Green Nature Reserve, Greywell Fen and the wider Whitewater Valley.

Rather than contributing positively to nature recovery, the proposed development risks creating further severance within an already fragmented landscape. The site represents one of the few remaining opportunities to restore and reconnect habitats between designated sites and strengthen ecological resilience at a landscape scale.

Natural England has previously identified this broader area as being particularly suitable for habitat restoration and network enhancement. These objectives are entirely consistent with the ambitions of the Local Nature Recovery Strategy, which seeks to create larger, better connected and more resilient habitats capable of supporting recovery of species and ecosystems.

The Trust considers that development on this site would undermine these strategic nature recovery objectives and erode one of the remaining opportunities to reconnect habitats within the historic Rothschild landscape.

Impact on Hook Common and Bartley Heath

The Trust manages Hook Common and Bartley Heath SSSI, both of which would be vulnerable to the direct and indirect impacts arising from development at Lodge Farm. These sites support nationally important heathland, wood pasture and wetland habitats alongside numerous protected and priority species. Significant resources are currently being invested in restoring ecological condition and addressing the historic effects of habitat fragmentation.

Hook Common and Bartley Heath Nature Reserve is currently subject to a comprehensive restoration programme with a focus on sensitive heathland and wood pasture communities, SPA annex birds and protected species. The aim of the restoration work is to address and mitigate the legacy of habitat fragmentation in the area. This involves improving and developing wood pasture habitat which supports ground nesting SPA birds including Woodlark *(protected in the UK under the Wildlife and Countryside Act, 1981)* and Nightjar *(Classified in the UK as Amber under the Birds of Conservation Concern 5: the Red List for Birds, 2021 and Priority Species under the UK Post-2010 Biodiversity Framework)*. In addition to birds, there is notable pressure on other species including the Adder *(Protected in the UK under the Wildlife and Countryside Act, 1981 and a Priority Species under the UK Post-2010 Biodiversity Framework)* which are very sensitive to fragmentation. The species that use Bartley Heath are already highly vulnerable and their population and success would be greatly impacted by the location and scale of the new development. Bartley Heath SSSI remains in an "unfavourable recovering" condition, and the Trust is concerned that additional development pressure would make the long-term recovery objectives significantly more difficult to achieve.

Taking all of this into consideration, we believe that Bartley South would be disproportionately impacted by the development and it would undermine the benefits of both the Trust's extensive restoration programme and the future Local Nature Recovery Strategy.

Policy NBE4 Biodiversity

"In order to conserve and enhance biodiversity, new development will be permitted provided:

a) *It will not have an adverse effect on the integrity of an international, national or locally designated site including the Thames basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSIs), Sites of importance for Nature Conservation (SINCs) and National and Local Nature Reserves (NNRs and LNRs). The level of protection afforded to these sites is commensurate with their status within this hierarchy and gives appropriate weight to their importance and contribution to wider ecological networks.*

b) *It does not result in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss;*

c) *Opportunities to protect and enhance biodiversity and contribute to wildlife and habitat connectivity are taken where possible, including the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations. all development proposals will be expected to avoid negative impacts on existing biodiversity and provide a net gain where possible."*

Policy NBE3 Thames Basin Heaths Special Protection Area

"New development which is considered to have a likely significant effect on the ecological integrity of the Thames Basin Heaths Special Protection Area (TBHSPA) will be required to demonstrate that adequate measures will be put in place to avoid or mitigate any potential adverse effects.

When considering development proposals for residential or similar forms of development the following principles will apply:

a) *there is an 'exclusion zone' set at 400m linear distance from the TBHSPA boundary. Permission will not be granted for development that results in a net increase in residential units within this zone unless it can be demonstrated through an Appropriate Assessment that there will be no adverse effect on the integrity of the TBHSPA;*
b) *there is a "zone of influence" set at between 400m and 5km linear distance from the TBHSPA boundary. Mitigation measures will be required for all net new dwellings and must be delivered prior to occupation and in perpetuity. Measures must be based on a combination of Strategic Access Management and Monitoring (SAMM) and the provision and maintenance of Suitable Alternative Natural Greenspace (SANG).*
c) *Residential development of over 50 net new dwellings that falls between five and seven kilometres from the TBHSPA may be required to provide mitigation measures. This will be assessed on a case-by-case basis in consultation with Natural England and where appropriate an appropriate assessment maybe required to ascertain whether the proposal could have an adverse effect on the SPA. The provision of SANG will meet the following standards and arrangements:*
    i) *a minimum of 8 hectares of SANG land (after discounting to account for current access and capacity) should be provided in perpetuity per 1,000 new occupants;*
    ii) *developments must fall within the catchment of the SANG that provides mitigation, except developments of fewer than 10 net new residential units. Where further evidence demonstrates that the integrity of the TBHSPA can be protected using different linear thresholds or with alternative mitigation measures these must be agreed with the Council and Natural England."*

This development is likely to significantly impact on the SPA network features, notably birds of interest utilising Hook Common and Bartley Heath, which are dependent on the functioning network of sites, and are highly sensitive to increased recreational footfall, likely to result from employment use of the adjacent development.

Policy NBE6 Water Quality

"Development will be required to protect the quality of the District's water environment, and where possible contribute towards improvements that are necessary to meet statutory requirements for water quality. Development will be supported provided that:

a) *it would not deteriorate the individual element band status of the District's waterbodies or prevent the waterbodies from achieving 'good' ecological status;*
b) *it would help to protect and, where possible, enhance the quality of groundwater and surface water features;*
c) *any adverse impacts on local water bodies would be fully mitigated; and*
d) *it incorporates sustainable drainage systems where appropriate."*

The river Whitewater catchment is already under significant pressure from poor ecological condition, water quality failures, wastewater infrastructure constraints and abstraction-related impacts on groundwater-dependent habitats.

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Given the site's proximity to the river Whitewater SINC and its relationship with the wider chalk stream catchment, the Trust is concerned that development at Lodge Farm could exacerbate existing pressures and undermine efforts to restore the ecological health and resilience of this sensitive river system.

River Whitewater SINC and chalk stream impacts

The Trust wishes to emphasise the exceptional importance of the river Whitewater.

The Whitewater is a chalk stream, a habitat of international conservation significance and one of the rarest freshwater ecosystems in the world. Approximately 85% of the world's chalk streams occur in England, making them globally scarce and effectively irreplaceable habitats. Chalk streams support highly specialised assemblages of aquatic plants, invertebrates, fish, birds and mammals and represent some of the most biodiverse freshwater environments in Europe.

The river Whitewater functions as a critical ecological corridor linking designated sites, priority habitats and species populations throughout the district. The river is designated as a Site of Importance for Nature Conservation and directly borders the proposed development.

The Trust remains deeply concerned that development of this scale would increase risks relating to:

- Surface water runoff;
- Water quality deterioration;
- Sedimentation;
- Hydrocarbon pollution;
- Nutrient enrichment;
- Recreational disturbance;
- Habitat fragmentation; and
- Increased pressure on already fragile river ecosystems.

The Whitewater is already classified by the Environment Agency as being in poor ecological condition. The reasons for not achieving good ecological status (RNAG) cite poor water quality relating to both diffuse and point source input, in particular, chemical failures are cited.

Any and further burdens on the catchment should be avoided wherever possible.

Wastewater Infrastructure

The Trust also has concerns regarding wastewater infrastructure serving the Whitewater catchment.

Local evidence has highlighted ongoing concerns regarding pumping station capacity and sewer network resilience in the Hook and Hartley Wintney area. Community organisations have documented occasions where existing infrastructure has struggled during periods of heavy rainfall and have raised concerns regarding the risk of sewage discharges affecting the river Whitewater. They have called for increased wastewater infrastructure capacity to reduce ongoing risks to the river's chalk stream ecology.

Data shows that in 2026, the river Whitewater was polluted by sewage 8 hours on 5 days, but also that CSO monitoring was offline for 315 hours. Where monitoring has been offline, the true pollution levels are unclear, and this emphasises concerns about infrastructure reliability, capacity and pollution risks. Permitting against a backdrop of ongoing deterioration due to CSO use, it can be inferred that there can be no confidence under the status quo that licences are being complied with or that there is capacity in the system to increase the burden.

The applicant must demonstrate that sufficient foul drainage and wastewater treatment capacity exists before any development proceeds.

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Water Resources and Greywell Fen

The Trust is also concerned about the wider implications of additional water demand within the Whitewater catchment.

The headwaters of the river Whitewater support Greywell Fen SSSI, one of the most important alkaline fen systems in southern England. Greywell Fen is a groundwater-dependent ecosystem whose ecological condition has long been affected by groundwater abstraction from the underlying chalk aquifer. Research and regulatory investigations have linked groundwater abstraction to hydrological changes affecting the fen's ecological health.

More recently, the Environment Agency refused renewal of South East Water's abstraction licence at Greywell after concluding that the licence failed environmental sustainability tests and acknowledging longstanding concerns regarding impacts on Greywell Fen SSSI. The Environment Agency records that cessation of abstraction had been expected under the Restoring Sustainable Abstraction Programme because of damage being caused to the site.

Given these existing pressures on the catchment, the Trust is concerned that additional development would increase demand on already constrained water resources. The applicant will need to demonstrate how the water requirements of the development can be met without contributing to further pressure on groundwater-dependent designated sites and habitats.

Conclusion

Hampshire & Isle of Wight Wildlife Trust maintains a strong objection to the development of Lodge Farm. The site occupies a strategically important position within a landscape identified for ecological recovery and connectivity. Development would place additional pressures on Hook Common and Bartley Heath SSSI, Bartley Heath SINC, the River Whitewater SINC, Greywell Fen SSSI and the wider Whitewater catchment, while undermining opportunities to deliver the objectives of the Local Nature Recovery Strategy.

Furthermore, when considered alongside other major developments proposed within the catchment, particularly Murrell Green, there is significant potential for cumulative impacts on ecological networks, water resources, wastewater infrastructure and the ecological integrity of the river Whitewater chalk stream. The Trust considers that the cumulative effects of these developments have the potential to significantly exceed the effects of either scheme in isolation and should be assessed accordingly.

The introduction of a major employment development immediately adjacent to these sites would increase pressures associated with:

- Increased recreational pressure on Hook Common and Bartley Heath SSSI, Bartley Heath SINC and the river Whitewater corridor;
- Further informal access, path creation and disturbance within sensitive heathland, wood pasture, wetland and riparian habitats;
- Deterioration in water quality through surface water runoff, sedimentation, nutrient enrichment, hydrocarbons and other pollutants entering the river Whitewater catchment;
- Additional pressure on wastewater infrastructure and foul drainage systems serving an already vulnerable chalk stream catchment;
- Increased water demand within a catchment already subject to abstraction pressures affecting groundwater-dependent habitats, including Greywell Fen SSSI;
- Artificial lighting, noise and increased human presence affecting protected and priority species, including ground-nesting birds, reptiles and other disturbance-sensitive wildlife;
- Greater habitat fragmentation and severance within one of the remaining opportunities to restore ecological connectivity between designated sites; and

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- Long-term urban edge effects that would undermine nature recovery objectives and compound cumulative impacts alongside other major proposals in the Whitewater catchment.

Neither the need for the development nor the benefits of it in this location outweigh the many adverse effects to the ecological network, the multiple Sites of Special Scientific Interest (SSSIs) and the Sites of Importance for Nature Conservation (SINCs) and the development, would likely contravene with the Hart's Local Plan Policies NBE4 Biodiversity; NBE3 Thames Basin Heaths Special Protection Area; NBE6 Water Quality; NPPF Section 15: Conserving and Enhancing the Natural Environment; Environment Act 2021 and the objectives of the Hampshire Local Nature Recovery Strategy.

The Trust is not satisfied that the development currently demonstrates how adverse effects on designated sites, ecological networks, water quality, nature recovery ambitions or the river Whitewater catchment can be avoided.

The Trust therefore considers that the principle of development on this site remains unacceptable and requests that these concerns are fully addressed before any planning application is submitted.

Yours sincerely,

Niam Tickner
Planning Policy and Campaigns Officer

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