Hampshire & Isle of Wight Wildlife Trust

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David Raper,
Planning and Building Control
Hart District Council
Harlington Way
Fleet
GU51 4AE
To: planningadmin@hart.gov.uk

13/08/2026

Dear David Raper,

Re: 26/01201/OUT: Outline application (with all matters reserved except access) for phased residential led mixed-use development comprising demolition of existing buildings/structures, provision of vehicular, cycle and pedestrian accesses (including details of 3no. accesses from the A30 London Road and 1no. access from the B3016 Odiham Road), development of up to 2,160 residential dwellings (including residential institution) (Use Class C2/C3), provision of employment, local centre and community uses (including education provision) (Use Classes E and F), blue and green infrastructure including sustainable drainage systems, public open space, sports pitches with pavilion, wildlife areas, Suitable Alternative Natural Green Space, and supporting infrastructure and associated works.

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.

The Trust wishes to object to the proposed development at Murrell Green due to the significant and unacceptable risks it poses to designated wildlife sites, ecological networks, protected species, the River Whitewater corridor, and nature recovery ambitions identified within the Hampshire Local Nature Recovery Strategy (LNRS). We do not consider that the submitted Environmental Statement provides sufficient evidence to demonstrate that the ecological impacts of a development of this scale can be adequately avoided, mitigated or compensated, nor that the proposal accords with the requirements of the National Planning Policy Framework (NPPF), Environment Act 2021, Hart Local Plan policies NBE3, NBE4 and INF2, or the wider ambitions of the LNRS.

Impact on designated sites
The application site sits within a highly sensitive ecological landscape and is surrounded by an extensive network of protected and designated sites. The Environmental Statement identifies:

- Thames Basin Heaths Special Protection Area (SPA) approximately 1.85km from the site;
- Six Sites of Special Scientific Interest (SSSIs) within 2km;
- Sixty-six Sites of Importance for Nature Conservation (SINCs) within 2km; and
- Seven SINCs within the application boundary itself.

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The presence of seven SINCs within the development boundary is particularly concerning. These sites form part of an interconnected ecological network and include woodland, wetland, grassland and aquatic habitats that support protected species and ecological connectivity across the wider landscape. The applicant acknowledges that, prior to mitigation, the development would result in significant adverse effects to SINCs through habitat loss, degradation, fragmentation and disturbance.

The Trust considers it inappropriate to rely heavily on future mitigation strategies to justify development where significant effects are acknowledged from the outset. The precautionary principle should be applied, particularly given the scale of the proposal and the ecological sensitivity of the receiving environment.

Impact on Hook Common and Bartley Heath SSSI and Warnborough Greens Nature Reserve
The Trust is particularly concerned about the indirect effects on Hook Common and Bartley Heath SSSI, located approximately 820m west of the site, and Warnborough Greens Nature Reserve, both of which are managed by Hampshire & Isle of Wight Wildlife Trust.

These sites are already under pressure from recreation, habitat fragmentation and urbanisation. The introduction of up to 2,160 new dwellings would create substantial additional recreational demand within the local landscape. While the applicant proposes Suitable Alternative Natural Greenspace (SANG), experience elsewhere has demonstrated that SANG does not eliminate recreational impacts and cannot wholly prevent residents from visiting established and valued wildlife sites.

Increased footfall, dog walking, informal path creation, nutrient enrichment from dog waste, littering and disturbance to wildlife are all foreseeable consequences of a development of this scale. The Trust is not satisfied that the Environmental Statement adequately assesses the likely increase in visitor pressure on our reserves or demonstrates that impacts can be avoided in perpetuity.

Recreational disturbance and the river Whitewater corridor
The River Whitewater represents one of the most important ecological features associated with the site. The Environmental Statement recognises the River Whitewater corridor as a key ecological network supporting bats, otter, invertebrates, birds and wider habitat connectivity across the landscape.

The Trust is particularly concerned that the development would place significant recreational pressure on the River Whitewater corridor and its associated habitats. Although development is proposed to be set back from parts of the corridor, the introduction of thousands of residents immediately adjacent to this sensitive environment will inevitably increase disturbance levels.

The Environmental Statement acknowledges that operational impacts include:

- Increased recreational pressure;
- Habitat degradation;
- Disturbance from dog walking;
- Nutrient enrichment;
- Trampling of vegetation;
- Effects on protected species; and
- Pressure on adjacent SINCs and wetland habitats.

The River Whitewater is not simply a local feature but forms a strategic wildlife corridor connecting habitats throughout Hart District and beyond. Any reduction in ecological functionality would have implications extending far beyond the development boundary.

We are also concerned that the assessment appears to underestimate potential hydrological and water quality impacts on the Whitewater catchment. Increased urbanisation, surface water runoff and recreational use all present risks that could undermine the ecological integrity of this river system.

Water resources, wastewater capacity and the river Whitewater

The River Whitewater is a chalk stream, a habitat of exceptional conservation importance and one of the rarest freshwater environments in the world. Chalk streams are widely recognised as irreplaceable natural assets, supporting highly specialised species and ecological processes that cannot easily be recreated or compensated for elsewhere. Given the Whitewater's role as a key ecological corridor and its connections to the wider network of designated sites and nature recovery areas, the Trust considers that any development which increases risks from sewage pollution, water abstraction pressures, recreational disturbance or urbanisation should be subject to the highest level of scrutiny and the precautionary principle.

The River Whitewater catchment is already subject to significant environmental pressures associated with both water supply and wastewater infrastructure. At the headwaters of the catchment, Greywell Fen SSSI remains adversely affected by historic groundwater abstraction. The Environment Agency has recently refused renewal of the Greywell abstraction licence owing to concerns regarding environmental sustainability and impacts on the designated site.

Simultaneously, local organisations have documented concerns regarding the capacity and resilience of wastewater infrastructure serving settlements within the Whitewater catchment, including the risk of sewage discharges to the river during periods of high rainfall. 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, this leaves ambiguous any additional pollution levels but also supports concerns about infrastructure reliability. 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 proposed addition of up to 2,160 dwellings would increase both potable water demand and wastewater generation within an already constrained catchment. The Trust is not satisfied that the application demonstrates that sufficient water resources and wastewater infrastructure can be provided without adverse effects on the River Whitewater, Greywell Fen SSSI and associated designated sites.

Impact on ecological networks and nature recovery

The Hampshire Local Nature Recovery Strategy identifies substantial opportunities for habitat restoration, ecological connectivity and nature recovery across this part of Hart. Of particular importance is the opportunity to establish and strengthen ecological corridors linking existing designated sites, ancient woodland, wetlands and river systems.

The application site lies within an area that has significant strategic potential for biodiversity enhancement and landscape-scale habitat connectivity. Instead of supporting nature recovery, the proposed development would urbanise a substantial proportion of this landscape and fragment an area that could otherwise contribute to a coherent ecological network.

While the applicant argues that green infrastructure will retain connectivity, the Trust considers that replacing open countryside with a large urban extension fundamentally alters ecological function. The proposed green infrastructure cannot replicate the value of the existing landscape mosaic or its future potential within the LNRS framework.

The NPPF is clear that planning decisions should contribute to and enhance ecological networks and support Local Nature Recovery Strategies. We do not believe this proposal achieves that objective.

Protected species and habitat connectivity

The Environmental Statement identifies:

- Functionally important bat habitat including nationally important barbastelle commuting routes;
- Confirmed hazel dormouse presence;

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- Great crested newts;
- Skylark territories;
- Important reptile populations;
- Significant invertebrate assemblages; and
- Wetland and woodland habitats supporting numerous protected species.

Of particular concern is the site's role in supporting nationally important barbastelle bat movements. The applicant acknowledges major adverse effects prior to mitigation arising from habitat fragmentation, lighting and loss of connectivity.

The Trust remains unconvinced that future mitigation and lighting controls can fully address the impacts of such a substantial urban development within a landscape used by highly sensitive bat species.

The Trust considers that the proposed development would result in:

- Significant adverse effects on ecological networks and habitat connectivity;
- Increased recreational disturbance to Hook Common and Bartley Heath SSSI, Warnborough Greens Nature Reserve and other nearby designated sites;
- Increased pressure on the River Whitewater corridor and its associated habitats;
- Significant environmental pressures associated with both water supply and wastewater infrastructure;
- Harm to SINCs within and beyond the application boundary;
- Potential conflict with the objectives of the Hampshire Local Nature Recovery Strategy; and
- Unacceptable risks to protected and priority species.

Given the scale of ecological harm, the strategic importance of the landscape for nature recovery, and the uncertainty surrounding the effectiveness of the proposed mitigation measures, Hampshire & Isle of Wight Wildlife Trust objects to this application and respectfully requests that Hart District Council refuses planning permission.

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

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