

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	11/12/2025
Application number:	PL/2025/08865
Proposal:	Outline: Residential development (up to three dwellings).
Site address:	LAND EAST OF 3 LOWER MARSH ROAD, WARMINSTER
Case officer:	Verity Giles-Franklin

Recommendations:

☐	No Comment
☐	Support
☐	No objection
☐	Condition (no objection subject to conditions)
☒	Objection - further information required
☐	Objection in principle
☐	HRA required

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date)
	Phosphorus budget	Habitat Regs	11/12/2025 Updated nutrient calculator	
	No net loss of local biodiversity resource and ecological networks	CP50, NPPS	11/12/2025 Ecological Parameters Plan	

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.

Thank you for consulting Ecology. I have reviewed the application and supporting documents against OS Maps, aerial photography of the site and surrounding area, together with GIS layers of statutory and non-statutory designated sites and existing records of protected species.

Information considered:

- Preliminary Ecological Appraisal, Ecologic, August 2025
- Natural England Nutrient Neutrality budget calculator for the River Avon, uploaded 07/11/2025
- Statutory Biodiversity Metric, Julian Prow, October 2025
- Existing Location & Site Plan and Proposed Site Plan, Baxter Green Architects, September 2025

The site comprises a paddock and stables, surrounded by dwellings to the north and west, grassland to the east, and grassland, trees and a stream (Cannimore Stream) to the south. It is proposed to demolish the stables and construct three dwellings.

COMMENTS:

Salisbury Plain Special Protection Area (SPA) 6.4km buffer

This application lies within the 6.4km zone of influence of the Salisbury Plain SPA and in light of the HRA for the Wiltshire Core Strategy and the HRA for the Wiltshire Housing Site Allocations Plan it is screened into Appropriate Assessment due to the potential impact of recreational pressure on stone curlew in combination with other plans and projects.

A strategic Appropriate Assessment (AA) has been prepared pertaining to development within the 6.4km zone of influence that could result in a likely significant effect on the SPA as a result of an increase in recreational / visitor pressure. The AA reached a conclusion of no adverse effects on the integrity of the SPA or its qualifying features provided that the council's mitigation strategy continues to be implemented. Annual stone curlew monitoring and protection measures continue to be secured by the Council.

In March 2025 Natural England (NE) confirmed that the 2024 strategic AA for Salisbury Plain SPA continues to be supported by NE.

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 (AA) 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 calculation has been submitted. However, the following issues were identified:

- The “nutrients from current land use” tab lists the current land use as “residential urban land”. However, the site comprises a paddock, which was being actively grazed by horses during the ecology survey. The more appropriate land use type for the site would be “mixed”. A description of land uses can be found here: [Using the nutrient neutrality calculators - GOV.UK](#).
- In the “nutrients from current land use” tab, the average annual rainfall bracket should be amended to “950-1000 mm” in line with the rainfall statistics estimated here: [NRFA station catchment information for 43021 - Avon at Knapp Mill](#)
- The SuDS tab needs to be updated, as currently it implies that SuDS will be provided across the entire 0.26 ha of the site. If no SuDS features are to be provided, please leave this tab blank. If SuDS are being provided – such as permeable paving, ponds and basins – then the name of each feature must be included, as well as the % of flow entering said features, as well as the total phosphorus (TP) removal rate of each feature. E.g., 75% of the runoff from the ‘residential urban land’ might drain to the SuDS feature, and the SuDS feature will remove 30% of the TP from that runoff. Please note, such SuDS would need to be included in the outline plans (see below) to demonstrate that the proposal could accommodate these features.

The calculation must be amended to address these issues, or suitable justification provided, and resubmitted to the Council for approval. The calculation must be approved by the council to enable the AA to be undertaken, which must be completed, and the conclusion agreed with Natural England prior to the application being determined.

Guidance on completing the phosphorus budget is available on our website ([Phosphorus and nitrogen mitigation - Wiltshire Council](#)). This webpage also contains information on the options available for developments to achieve nutrient neutrality.

Ecological Parameters Plan

An Ecological Parameters Plan (EPP) is required. The EPP must clearly identify those areas of the site which are unconstrained, those areas where sensitive design or restrictions may be required, and any areas of the site which are to be retained, remain undeveloped, enhanced, form part of the landscaping for the purposes of protecting and enhancing biodiversity and any areas to be used as compensatory habitat in line with the submitted ecology documents, including the Biodiversity Net Gain Calculator spreadsheet. The EPP will become an 'approved document' of any outline permission granted and any reserved matters application must be in compliance with the plan.

The EPP must include:

1. A scaled drawing showing existing ecological features, distinguishing between those to be retained and those which will be lost e.g. hedgerows, trees, etc.
2. Specify the minimum distance from each feature to the footprint of development e.g. to curtilage of properties, car parks, roads.
3. Specify the buffer distance from light sensitive ecological features where the increase in lux levels will be zero or, if lux contours have been modelled, show contour lines for 1, 0.5 or 0.1 lux depending on the sensitivity of ecological features
4. Identify where new habitats will be created on site, include minimum area in hectares or length in metres and habitat type
5. Identify areas where habitat enhancement will be undertaken, include minimum area in hectares or length in metres and habitat type, e.g. defunct hedgerow to be grubbed up and replanted
6. Provide stand-off distances to the footprint of development e.g. curtilage to properties, car parks, roads for each tree to be retained, sufficient to ensure the tree will survive throughout the operational phase without risk of it being removed for health and safety, loss of amenity or liability reasons.
7. Provide cross-sectional drawing to show profile of SuDs, ponds or wetland features to demonstrate there is adequate room for these features to have gently profiled sides and thereby maximise their biodiversity potential.

Protected and notable species

The existing buildings (three stables) are reported to have no features potentially suitable for use by roosting bats. The paddock likely provides some bat foraging and commuting habitat, and could possibly be used by other taxa including nesting birds, badgers, amphibians and reptiles, though it appears to be regularly disturbed by grazing horses. It is considered that the risk posed to these species can be minimised, as appropriate, through the implementation of sensitive working measures, which should be detailed within a Construction Method Statement (CMS). The CMS should be secured via a planning condition.

In line with the NPPF and CP50, applications must ensure that no net loss of functional habitat for the benefit of wildlife in the local area will occur as a result of the proposed development. In addition, gains for biodiversity, relevant to local habitats and wildlife populations, should form part of the proposed development. It is noted that there is a high concentration of common toad and frog records within the vicinity of the site, with toad patrols operated (seasonally) in the area. The applicant is advised to demonstrate how the site will remain permeable to wildlife such as toads, for example with the inclusion of amphibian ladders in any proposed drains, the use of wildlife-

friendly soft landscaping and permeable garden boundaries (such as hedgerow). This should be achieved via a planning condition for biodiversity enhancements, and/or enhancement features could be shown in detail in the EPP (as above). Other relevant enhancement features should include provisions for nesting birds and roosting bats.

Biodiversity Net Gain

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.

Completed maps, condition assessment and statutory metric calculation (*Statutory Biodiversity Metric, Julian Prow, October 2025; Preliminary Ecological Appraisal, Ecologic, August 2025*) stating the baseline and predicted post-development biodiversity units of the site have been submitted.

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) biodiversity value	0.33 Habitat units
	0.00 Hedgerow units
	0.00 Watercourse units
Are there any irreplaceable habitats on-site?	No
Has any habitat degradation of occurred?	No

Confirmation of how the development will achieve BNG is a post-determination matter however consideration should be given to how any proposed BNG will be secured.

IN SUMMARY: Insufficient information has been submitted. In carrying out its statutory function, the LPA must be reasonably sure that the proposal will not result in significant adverse effects on protected habitats or species. The information outlined above must therefore be submitted and reviewed by the LPA's ecology team prior to determination of the application. I therefore maintain a holding objection until all the issues listed above have been suitably addressed.

CONDITIONS: wording to be provided once above issues resolved.

Sign off by WC Ecologist will only be given once ALL outstanding information has been submitted and agreed sufficient.

Ecologist	Date
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