



11th November 2025

Version 1

ECOLOGICAL ADDENDUM

Applicant: BWD Trading Ltd.

Application: Erection of up to 205 no. dwellings, community hub, public open space, access infrastructure and associated works, with all other matters reserved.

Site Address: Land West of Westbury Road, Warminster, Wiltshire.

1.1 Background

1.1.1 This Ecological Addendum has been prepared by Ethos Environmental Planning to update the Ecological Impact Assessment (EcIA)¹ submitted for an outline planning application for the erection of up to 205 dwellings plus facilities, with all other matter reserved.

1.1.2 For background, the Summary Response (Ethos 2022)² to the LPA Ecology consultation on the preceding application (PL/2021/0913) was addressed as follows:

1	Parameters Plan – Green Infrastructure	CP50/ NPPF	Minimum widths of ecological buffers (in metres) to be stated on plan	Parameter Plan updated to state the minimum widths on the plan.
2	Biodiversity metric	CP50/ NPPF	Provide version 3.0 of metric with revision to hedgerow enhancement sheet	Typo in EcIA – should be metric 2.0 (see explanation below). The metric excel spreadsheet will be submitted week of 28 th March. Metric 2.0 updated to revised habitat proposals in NW of site, to be submitted week of 28 th March.
3	Biodiversity Net Gain Report	CP50/ NPPF	Reference made to this in the EcIA, confirm if this report is being submitted, and submit as appropriate.	BNG report updated to revised habitat proposals in NW of site, to be submitted week of 28 th March.
4	Biodiversity Metric	CP50/ NPPF	Submit plans to show how areas for baseline and post construction situations were calculated	Existing and proposed habitat maps are provided in the BNG Report.
5	Salisbury Plain SPA	Habs Regs	Council Ecologist to insert generic AA when endorsed by NE	Noted.

¹ Ecological Impact Assessment Land off Westbury Road, New Farm Warminster. V1, February 2022.

² Response to Ecology Consultation PL/2021/09013, 25th March 2022.

Additions to Table 8 in the EclA 2022:

Railway wildlife corridor (adjacent to west boundary)	Local scale	• Pollution control measures, good practice construction working. • Provision of ecological buffers.	Mitigation measures secured through a CEMP. Detailed landscape plan.
Wet woodland	Local scale	• Pollution control measures, good practice construction working. • Installation of protective tree fencing. • Provision of ecological buffers.	Mitigation measures secured through a CEMP. Detailed landscape plan. Monitoring and management secured through a LEMP.

To support a resubmission, this Addendum provides the results of an updated walkover surveys and updated static survey, both undertaken in 2025.

1.2 Summary of 2021 Ecology Surveys and Assessment

1.2.1 A comprehensive suite of ecology surveys was undertaken in 2021 to inform the ecological baseline for the Ecological Impact Assessment. The important features for nature conservation were identified as the River Avon SAC (National), Bath and Bradford on Avon Bat SAC (National), Steam (local), Hedgerows (local) and Greater Horseshoe bats (Local). The assessment and mitigation related to the Nationally important sites are assessed within the HRA.

1.2.2 Mitigation for the stream and hedgerows comprise protection measures during construction (secured through a CEMP) and the provision of appropriate ecological buffers and dark corridors integrated into the landscape design. The ecological buffers and proposed landscaping also provide sufficient mitigation to maintain the conservation status of Greater Horseshoe bats (also assessed in the HRA).

Habitat Regulations Assessment

1.2.3 The scope of the HRA covered the Bath and Bradford on Avon Bat SAC, Salisbury Plain SPA/SAC and the River Avon SAC. The HRA had been agreed with the Council and Natural England.

Bath and Bradford on Avon Bat SAC

1.2.4 The site is within the consultation zone for greater horseshoe bats. The bat surveys confirmed the presence of this species on site, notably using two hedgerows for commuting and occasional foraging. Impacts screened in during the construction phase comprised 'temporary loss of foraging habitat and flight lines' and 'temporary light disturbance'. During the operational phase, 'permanent light disturbance' was

screened in. Mitigation during the construction phase comprises timing of works, hedgerow and habitat planting and sensitive construction lighting, details of which are to be set out within a CEMP and LEMP to be secured by condition. Mitigation during the operational phase comprises a carefully designed lighting scheme, compliance with which can be secured by condition. The sHRA will be reviewed and updated for the new application.

Salisbury Plain SPA/SAC

- 1.2.5 Construction impacts on the Salisbury Plain were scoped out due the distance of the appeal site from the SAC/SPA. Operational impacts from recreational pressure were scoped in, with mitigation to be delivered through CIL contribution to the delivery of the HRA and Mitigation Strategy for Salisbury Plain SPA (Wiltshire Council). This mitigation strategy will apply to the new application.

River Avon SAC

- 1.2.6 The screening assessment concluded that an increase in phosphate pollution from surface water run-off and waste water discharge of the appeal scheme would have a likely significant effect on the River Avon SAC. Recreation and air quality effects are screened out. The mitigation strategy for the proposed development during construction and operation was set out in phosphate neutrality report (CD.A.88) and this will be updated for the new application proposals.

1.3 UKHab Survey and walkover update 2025

- 1.3.1 UKHab survey and ecological walkover surveys were undertaken on 27th August and 25th September 2025, which included an update of habitat condition assessments for the biodiversity net gain assessment. A river condition assessment was carried out on 14th October 2025.
- 1.3.2 No substantive changes to site habitats have been recorded since the previous assessment, as evidenced by the comparative photographs presented in Table 1 (2021 vs. 2025). The updated UKHab survey indicates that baseline habitat composition, structure, and extent remain largely unchanged, with the exception of the two northernmost fields, which have been downgraded to modified grassland due to current vegetation composition from agricultural use modifying the grassland.

Table 1 Habitat site photos from 2021 and 2025

2021	2025
	
Arable crop over majority of site	
	
Hedgerow 5, Westbury Road	
	
Hedgerow 2, internal hedgerow	

2021	2025
	
<i>Hedgerow 3, internal hedgerow</i>	
	
<i>Other neutral grassland to south of wet woodland</i>	
	
<i>Mixed scrub (a lot of ash die back noted 2025)</i>	

2021	2025
	
<i>Woodland pond</i>	
	
<i>Modified grassland in north</i>	
	
<i>Seasonally wet watercourse</i>	



Figure 1 Existing habitats



Figure 2 Proposed habitats

Protected Species 2025

- 1.3.3 As there are no alterations to existing habitats, the range and quality of habitats remain unchanged. Therefore, no changes to the species assemblages supported, or to the outcomes of the ecological assessment, are expected.
- 1.3.4 The site is assessed to support badger (outlier sett), commuting features for bats (see section 1.4)

1.4 Bat Survey 2025

- 1.4.1 A bat static detector survey was undertaken for a period of 8 consecutive nights, 27th August to 4th September. By collating late summer early autumn bat data, provided the levels of bat activity were similar as previously recorded across the site; together with no significant changes in habitat or land usage, it could be reasonably extrapolated that there has been no change in assemblage use of commuting features.
- 1.4.2 Detectors were deployed in the same locations as the previous survey to ensure consistency and comparability of results. This repeat survey allows direct assessment of any changes in species presence, activity patterns, or foraging behaviour.

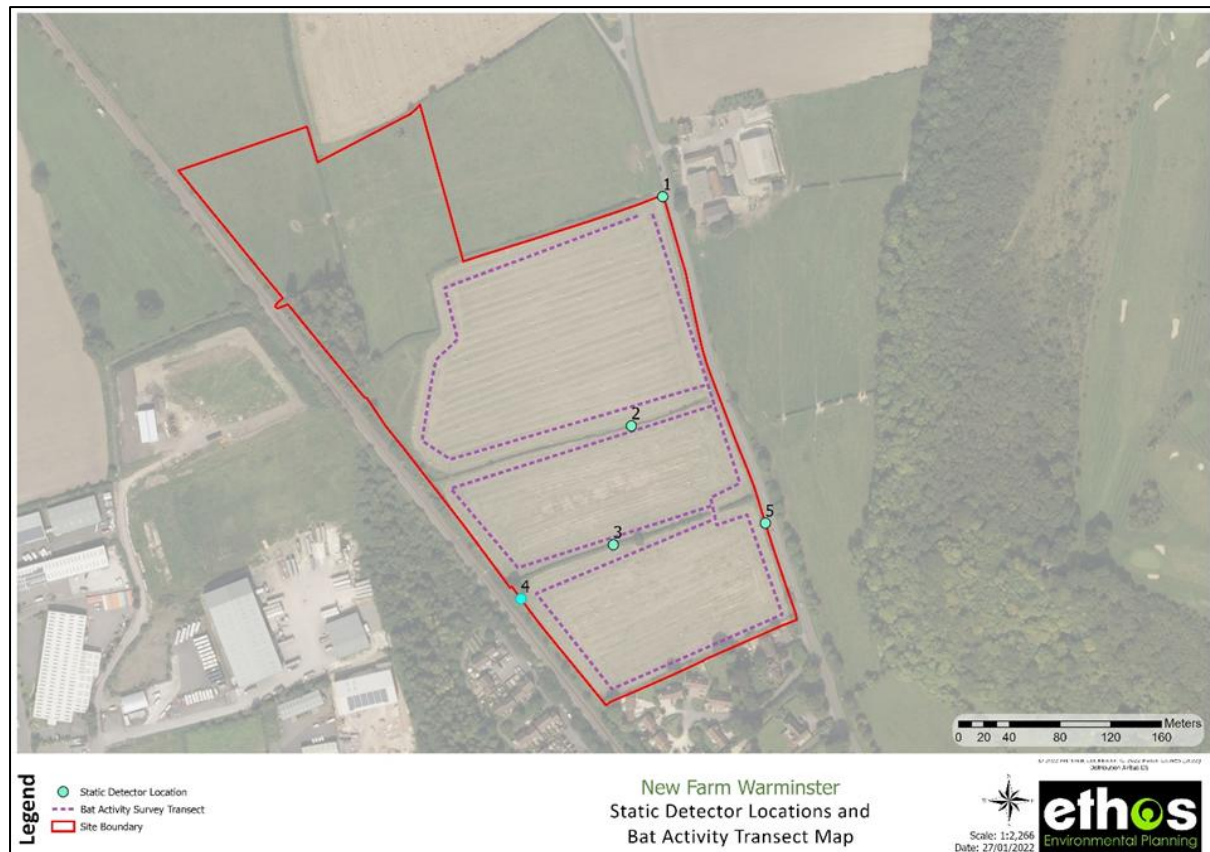
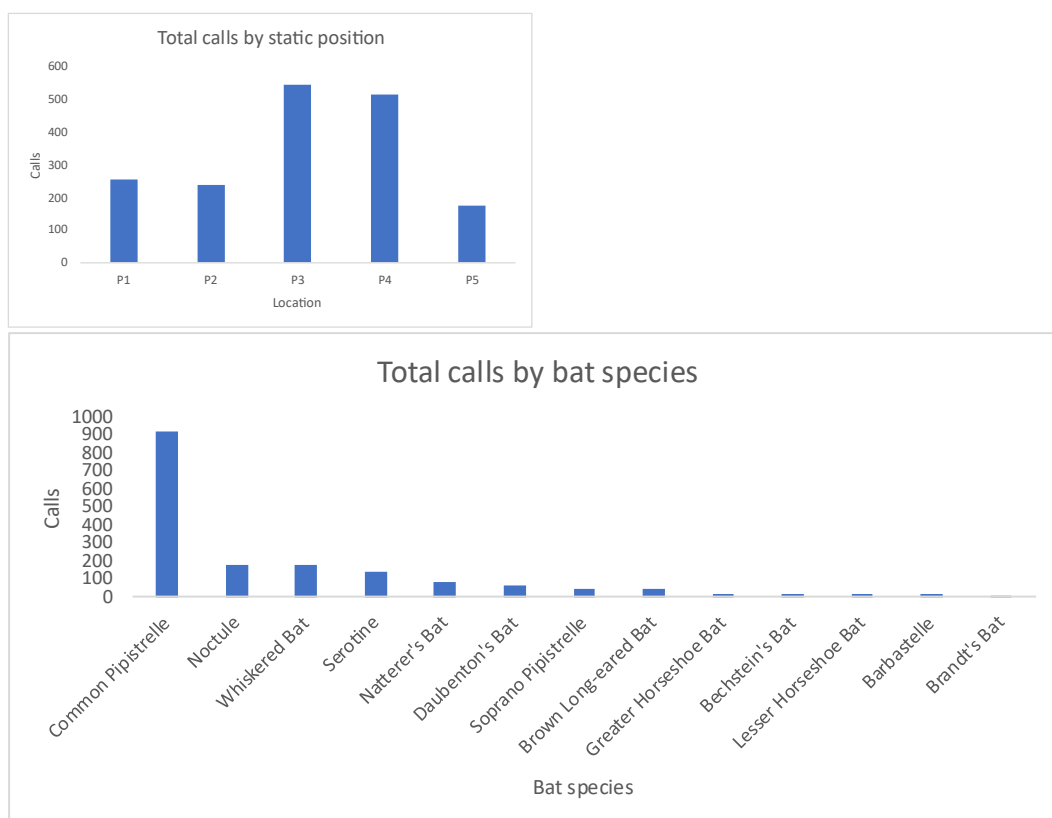
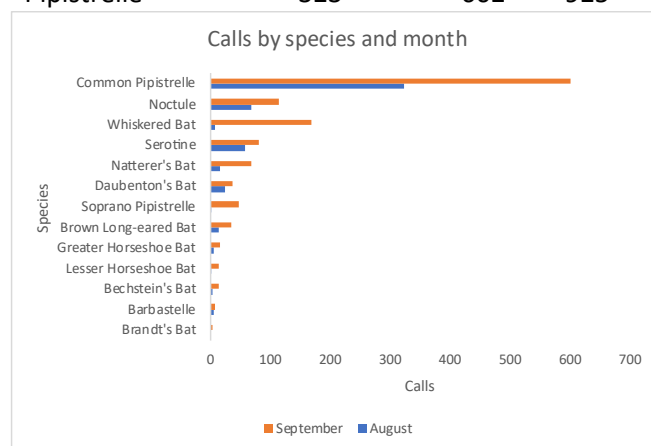


Figure 3 Bat static locations

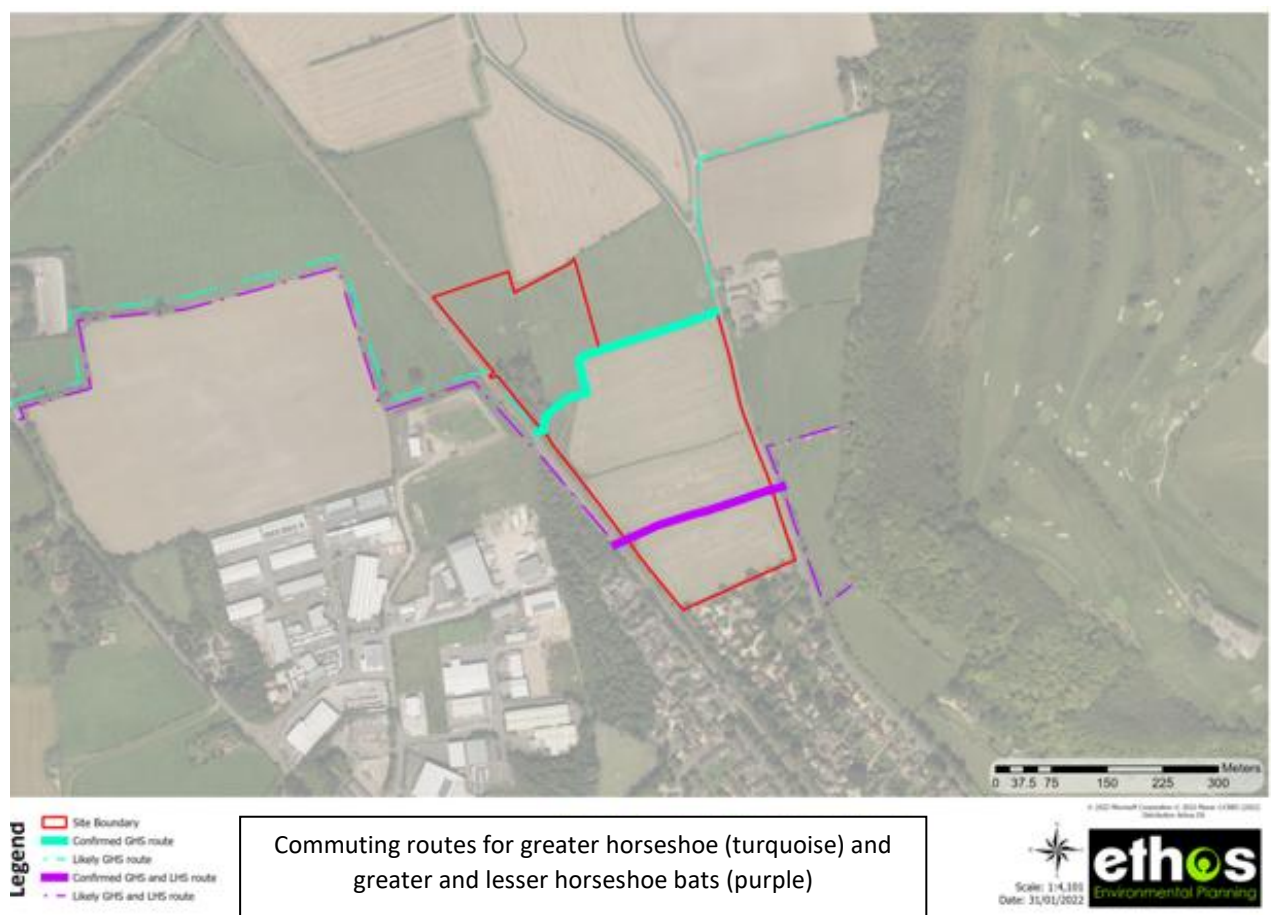


Row Labels	August	September	Grand Total
Brandt's Bat		4	4
Barbastelle	5	8	13
Bechstein's Bat			
Bat	3	13	16
Lesser HS	2	14	16
Greater HS	5	15	20
Brown LE	14	34	48
Soprano			
Pipistrelle	2	47	49
Daubenton's	25	37	62
Natterer's	16	68	84
Serotine	58	80	138
Whiskered	7	169	176
Noctule	68	115	183
Common			
Pipistrelle	323	602	925



	P1	P2	P3	P4	P5	Grand Total
	North boundary	Central Hedge	Lower central hedge	West railway	East Westbury Rd	
Brandt's Bat			3	1		4
Barbastelle	4	1	5	1	2	13
Bechstein's Bat	4	1	7	2	2	16
Lesser Horseshoe Bat		3	11		2	16
Greater Horseshoe Bat	7	2		10	1	20
Brown Long-eared Bat	9	10	16	13		48
Soprano Pipistrelle	3	4	33	7	2	49
Daubenton's Bat	15	4	9	17	17	62
Natterer's Bat	24	12	40	8		84
Serotine	76	12	3	36	11	138
Whiskered Bat	1	124	12	38	1	176
Noctule	24	18	47	52	42	183
Common Pipistrelle	89	47	361	332	96	925
						1734

- 1.4.3 The data largely concurs with the previous evaluation of the site's importance for bats and therefore the assessment and mitigation measures for horseshoe bats remains as assessed. In general, the results indicate that bats are utilising the site for commuting between the woodland to the east and the key commuting railway corridor to the west. There appears to be an increase of activity in September, likely attributed to bats transitioning summer roost site, swarming sites and their hibernation roosts.
- 1.4.4 The proposals include dark corridors with buffering of hedgerows for commuting bats, notably from east-west linking the offsite woodland to the railway corridor. Habitat creation alongside the railway includes woodland planting combined with creation of priority habitat wetland (winterbourne stream), species rich grassland, mixed scrub, traditional orchard; all of which provide enhanced foraging and commuting opportunities for bats. The linear woodland will strengthen landscape connectivity, acting as a buffer and flight corridor, while the species rich grassland, mixed scrub and priority habitat wetland will increase insect abundance and diversity, supporting feeding activity. Together, these measures will improve habitat quality, ecological connectivity, and roosting potential within and around the development site, contributing to long-term bat conservation objectives.



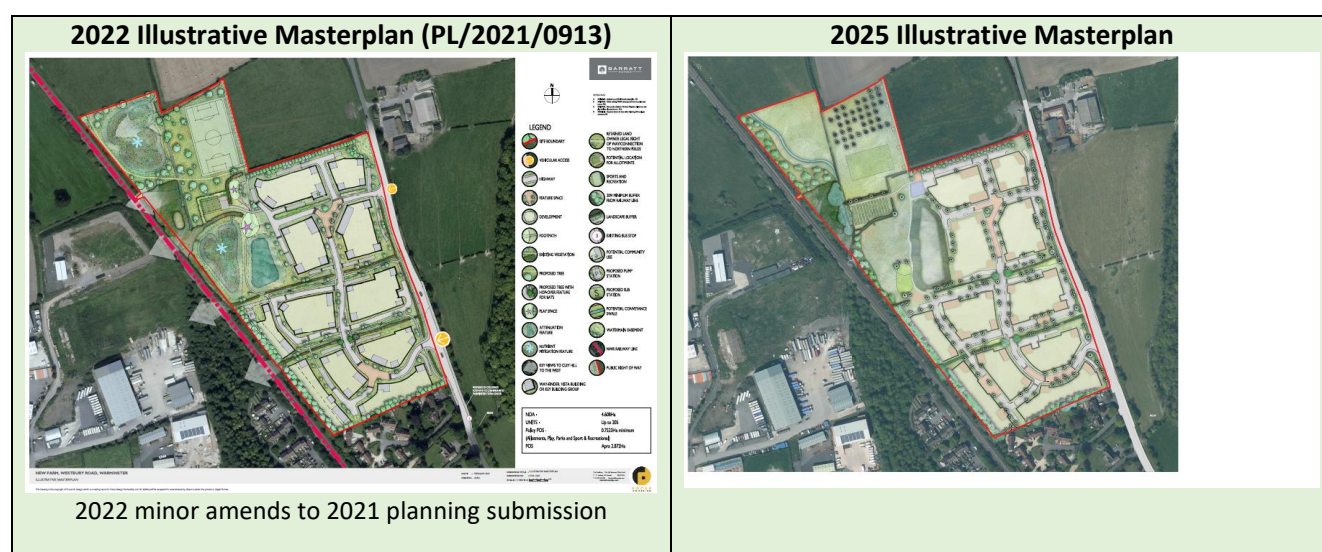
1.5 River enhancements 2025

- 1.5.1 There is good evidence to suggest that the watercourse on the site is a winterbourne stream. Winterbournes are rare chalk streams which are groundwater fed and only flow at certain times of the year as groundwater levels in the aquifer fluctuate. This watercourse sits on the West Melbury Marly Chalk formation at the upper reaches on the Hampshire Avon catchment as a tributary to the River Were. The flow of water is seasonal with water only present when there have been high rainfall events, for much of the year the channel is dry.
- 1.5.2 The proposals provide an opportunity to restore this important ecological habitat which support a range of specialist wildlife adapted to this unusual flow regime, including a number of rare or scarce invertebrates. A supporting technical note³ sets out the principals of how this watercourse can be restored and enhanced to function as a natural winterbourne stream in the northern section of the site, where current land practices have degraded and overdeepened the watercourse.
- 1.5.3 The river restoration recommendations have been incorporated into the landscape strategy and the detailed restoration design will be addressed in reserved matters.

1.6 Summary of Proposed Habitats Amendments 2022 and 2025

- 1.6 The key habitat changes between the previous application and this new submission are set out in table 2.

Table 2 Key Proposed Habitat Amendments to the outline landscape and ecology strategy



³ Ethos Environmental Planning (2025) River Enhancement Technical Note, Land West of Westbury Road, v1.

Wetland and reedbed creation (on site nutrient neutrality solution)	Priority Habitat: Winterbourne creation (NW) – restoration of natural chalk stream habitat.
	Woodland belt planting (west) – significant woodland planting on the west boundary alongside the railway corridor.
	Priority Habitat: Traditional Orchard in the north of the site.

Ecological Impact Summary for the resubmission:

Methodology	A desk study and UK Habitat Classification survey were undertaken for the site in 2020 and 2025. Further surveys for bats, dormouse, great crested newts, and riparian mammals were undertaken in 2021. An updated walkover was carried out in 2025. The BNG assessment has been updated to the Statutory Metric.																				
Baseline Ecological Conditions	The site falls within the consultation zones of: i) Salisbury Plain Special Area of Conservation (SAC), ii) River Avon SAC, iii) Bath and Bradford on Avon SAC. Likely significant effects are assessed in updated shadow HRA. The 10.5 ha site was dominated by three arable fields bordered by hedgerows with permanent grassland and a small woodland copse in the northeast of the site. A small woodland copse with pond was located adjacent to the railway corridor in the north west of the site. Fourteen species of bat have been recorded on site, which was dominated by common pipistrelle bats. Bat activity for all species was focused along the northern boundary hedgerow (H2), west boundary bordering the railway corridor and the hedgerow towards the south of the site (H4). H2 is an important commuting and foraging feature for greater horseshoes and the central southern hedge (H4) is an important commuting and foraging features for greater and lesser horseshoe bats. Badger is confirmed present on site with outlier setts in the east and west boundary hedgerows and foraging signs on site, notably along the hedgerow to the south (H4). The boundary hedgerows and field margins have potential to be used by breeding birds, hedgehogs (and other section 41 species). Water vole and otter have not been confirmed present on site, however they are highly mobile species and the stream provides suitable habitat. <i>Summary of important ecological features:</i> <table border="1"> <thead> <tr> <th>Important ecological features</th><th>Scale of Importance</th></tr> </thead> <tbody> <tr> <td>River Avon SAC</td><td>International</td></tr> <tr> <td>Bath and Bradford-upon-Avon Bats SAC</td><td>International</td></tr> <tr> <td>Stream</td><td>Local</td></tr> <tr> <td>Hedgerows</td><td>Local</td></tr> <tr> <td>Greater and Lesser Horseshoe Bats</td><td>County</td></tr> <tr> <td>Riparian Mammals (water vole and otter)</td><td>Precautionary working</td></tr> <tr> <td>Section 41 Mammals – hedgehog Brown Hare, Polecat</td><td>Precautionary working</td></tr> <tr> <td>Birds</td><td>Precautionary working</td></tr> <tr> <td>Badger</td><td>Legislation / Precautionary working</td></tr> </tbody> </table>	Important ecological features	Scale of Importance	River Avon SAC	International	Bath and Bradford-upon-Avon Bats SAC	International	Stream	Local	Hedgerows	Local	Greater and Lesser Horseshoe Bats	County	Riparian Mammals (water vole and otter)	Precautionary working	Section 41 Mammals – hedgehog Brown Hare, Polecat	Precautionary working	Birds	Precautionary working	Badger	Legislation / Precautionary working
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	The layout of the development has been developed to minimise impacts on site ecology as follows: • Buffering of retained hedgerows and management to enhance the features by improve structure (height and bushy) and diversity; • New structural habitat planting and traditional orchard planting along north boundary to enhance northern GI link, and replacement hedgerow planting to maintain link to wet woodland and railway corridor; • New structural habitat planting along southern boundary to create a new linear feature and GI along the southern boundary (no existing hedgerow). Links to railway corridor; • New woodland habitat planting along the west boundary, providing a wide habitat buffer between plots and the railway corridor and connecting hedgerow, strengthening GI on site. • Retention of continuous canopy along H4, to retain linear feature for bats; • Enhancement of areas of retained modified grassland to species-rich grassland; • Substantial buffering of stream and creation of a new channel, winterbourne in the northwest. • Integrated open space, allotments, recreational areas, Sustainable Drainage Systems, species rich grassland, woodland, mixed scrub and planted trees, that are managed for biodiversity and wildlife.
Key impacts and mitigation	The development layout has been designed to retain, protect and enhance the most valuable ecological features comprising the boundary hedgerows. Mitigation measures are described to ensure compliance with protected species legislation for bats, breeding birds, section 41 mammals, and reptiles. The loss of the arable fields and poor other neutral grassland on site requires no mitigation. The supporting updated shadow HRA assesses that that with mitigation for lighting (construction and operation) and canopy hop-overs in hedgerows for bats, that there are no likely Significant effects of the favourable conservation status of greater horseshoe bats.

1.7 Conclusions

- 1.7.1 There is no change to the red line boundary and the new layout has been revised to reflect the matters raised during the appeal earlier this year, primarily relating to flood risk and infrastructure.

- 1.7.2 The UKHab survey, walkover update and passive detector bat survey have confirmed that there has been no significant change to the habitats or protected species present within the site; or the conditions and land use, since the previous assessment.
- 1.7.3 As there have been no substantive changes to the habitats present and habitat extents, structure, and composition remain consistent with those previously recorded, and no new habitat features of ecological interest were identified, it is concluded that the suitability of habitats to support protected or notable species is considered unchanged.
- 1.7.4 As such, the baseline conditions, important ecological features, evaluation and assessment of impacts as presented in the full EclA for the initial scheme remains valid for this resubmission.
- 1.7.5 A full update of habitat and protected species surveys will be undertaken to inform the subsequent Reserved Matters application. Namely this will cover a refresh of a full season of bat activity surveys (transects and statics), updated badger survey (existing outlier sett on site), and updated great crested newt eDNA survey (negative for GCN) and dormouse surveys (likely absent). This will inform any updates that may be required to the species mitigation strategies for the detailed proposals, and if any works may be licensable.
- 1.7.6 The proposed landscape strategy, which includes the creation of traditional orchard, mixed scrub, and species-rich meadow grassland, will deliver substantial ecological and landscape benefits to the local area. Together, these habitats will provide structural and floristic diversity, supporting a broad range of invertebrates, birds, and small mammals while enhancing habitat connectivity across the site.
- 1.7.7 The addition of particular note in this new scheme is the creation of a new water channel to restore a priority habitat, a chalk winterbourne stream. This will deliver measurable ecological and hydrological benefits. Chalk winterbourne streams support a specialised assemblage of species adapted to intermittent flow and high water quality. These habitats sustain characteristic chalk river flora and notable invertebrate communities as well as providing valuable foraging and refuge opportunities for amphibians, water vole, birds and bats.
- 1.7.8 It will also contribute to natural flood management and climate resilience, aligning the development with local biodiversity and catchment management objectives. Overall, inclusion of the river restoration provides significant ecological gain and supports the delivery of a more sustainable and environmentally integrated development.

Table 3 Summary of significance of effects and mitigation/compensation

Ecological Feature	Significance of effects	Mitigation/Compensation	Mechanism for securing delivery
River Avon SAC	International scale	- Creation of SuDS - Pollution control measures during construction - Surface water drainage strategy for pollution control measures integrated into the design.	SHRA, Appropriate Assessment. Mitigation measures secured through a CEMP. Monitoring and habitat management secured through LEMP/HMMP.
Bath and Bradford on Avon Bat SAC	International Scale	- Mitigation to avoid and minimised potential fragmentation of linear features used by horseshoe bats. - Dark corridors (<0.5 lux) on commuting and foraging features used by horseshoe bats. - Sensitive lighting strategy for construction and operation. - Advance landscaping.	SHRA Appropriate Assessment. Mitigation measures secured through a CEMP. Monitoring and habitat management secured through LEMP/HMMP.
Stream	Local scale	Pollution control measures, good practice construction working.	Mitigation measures secured through a CEMP.
Hedgerows	Local scale	- Installation of protective tree fencing. - Provision of ecological buffers. - Replacement hedgerow planting. - Bolster planting, new hedgerow planting. - Less frequent management of hedgerows for bat habitat.	Mitigation measures secured through a CEMP. Detailed landscape plan Monitoring and habitat management secured through LEMP/HMMP.
Greater and lesser horseshoe bats	County scale	- Hedgerow removal works sensitively timed to winter months. - Sensitive lighting strategy – construction and operation. - Advance works landscaping - Soft landscaping planting mix with species selected for value to attract invertebrates including night scented species. - Creation of new habitats for foraging benefit SuDs and wetland habitat.	SHRA, Appropriate Assessment. Mitigation measures secured through a CEMP. Monitoring and habitat management secured through LEMP/HMMP. Lighting strategy secured by condition.
Riparian Mammals	Site scale	- Pre-works survey. - Precautionary construction measures	Mitigation measures secured through a CEMP.

Ecological Feature	Significance of effects	Mitigation/Compensation	Mechanism for securing delivery
		Bank side habitat enhancements.	Monitoring and habitat management secured through LEMP/HMMP.
Hedgehog	Site scale	- Precautionary construction measures. - Measures to ensure site remains permeable post-construction (hedgehog gaps)	Mitigation measures secured through a CEMP. Monitoring and habitat management secured through LEMP/HMMP.
Birds	Site scale	- Timing of hedgerow removal works to avoid nesting bird season, or supervision of hedgerow removal under ECoW. - Replacement and new hedgerow planting. - Soft landscaping planting mix with species selected for foraging value.	Mitigation measures secured through a CEMP.
Badger	Site scale	- Pre-works survey. - Preparation of badger mitigation strategy - Precautionary construction measures - Landscape buffer corridors (north and south) and hedgerow buffers to ensure site remains permeable post -construction. - Soft landscaping planting mix with species selected for foraging value.	Badger mitigation Strategy secured by condition. CEMP secured by condition
Other bats	Site scale	- Hedgerow removal works sensitively timed to winter months. - Sensitive lighting strategy – construction and operation. - Advance works landscaping - Soft landscaping planting mix with species selected for value to attract invertebrates including night scented species. - Creation of new habitats for foraging benefit SuDs and wetland habitat.	Mitigation measures secured through a CEMP. Monitoring and habitat management secured through LEMP. Lighting strategy secured by condition.
Invertebrates	Site scale	Pollution control measures, good practice construction working.	Mitigation measures secured through a CEMP.