

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Abi Gazzard
Date:	11/12/2025, 16/02/2025
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)
1.	Phosphorus budget	Habitat Regs	11/12/2025 Updated nutrient calculator	YES -16/02/2026 Natural England Nutrient Neutrality budget calculator for the River Avon, uploaded 23/12/2025
2.	No net loss of local biodiversity resource and ecological networks	CP50, NPPS	11/12/2025 Ecological Parameters Plan	YES -16/02/2026 Mitigation and Constraints Plan, Ecologic, February 2026 Compensation and Enhancement Plan, Ecologic, February 2026

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
- [Mitigation and Constraints Plan, Ecologic, February 2026](#)
- [Compensation and Enhancement Plan, Ecologic, February 2026](#)
- [Natural England Nutrient Neutrality budget calculator for the River Avon, uploaded 23/12/2025](#)

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.

[Thank you for reconsulting Ecology; my second comments are shown in blue. After further discussion, the applicant has submitted a “Mitigation and Constraints Plan” and “Compensation and Enhancement Plan” to address the EPP requirement.](#)

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.

A revised nutrient calculator has been submitted, addressing the concerns above. The nutrient budget calculated a total phosphorus budget of 0.72 kg TP/year pre 2030 and 0.64 kg TP/year post 2030. The budget has been approved by Wiltshire Council.

A Council-led scheme of phosphorus credits will be available for development which meets certain criteria at a fixed cost per kilogram of phosphorus, provided supply of mitigation is available. A completed Hampshire Avon Credit Screening Approval Certificate is required to apply for this scheme. The ecology section of this certificate has been completed by the Council's ecology team for this application. This certificate can only be issued by the case officer if the application meets the two deliverability tests. Further details of the Council-led scheme, including eligibility criteria, current cost to purchase credits, and details of how to apply, is available on our website [Phosphorus and nitrogen mitigation - Wiltshire Council](#).

Ecology officer approval Approval of Nutrient Budget	Document reviewed – Natural England Nutrient Neutrality budget calculator for the River Avon, uploaded 12/02/2026 Pre 2030 budget – 0.72 kg TP/year Budget approved - Yes Date – 16/02/2026
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A strategic Appropriate Assessment (AA) has been prepared for qualifying planning applications for residential and non-residential development, within sewered and non-sewered areas of the River Avon SAC catchment. The AA reached a conclusion of no adverse effects on the integrity of the SAC or its qualifying features and has been endorsed by Natural England (NE) provided that the council's mitigation strategy continues to be implemented.

These comments assume that this application qualifies for and will be proceeding with the Council-led scheme.

The mitigation fee and administration charge for the scheme can be paid by a section 111 agreement. It is also possible to pay the mitigation fee through a section 106 agreement or unilateral undertaking.

NEXT STEPS:

- The case officer will send you the credit screening approval certificate
- Once you have received this you can apply directly via this form: [Development Application in the Hampshire Avon Catchment](#)
- You will then be emailed directly when credits are available (expected 2 weeks)
- There is then the option of securing credits via a Section 111 form which will be sent to you.

If the application does not qualify for the Council-led scheme, or the applicant decides not to proceed with the scheme, details of an alternative mitigation strategy must be submitted for review and the Council's ecology team consulted. Any alternative mitigation scheme would be subject to a bespoke Appropriate Assessment.

NB. Any changes to the submitted plans at the reserved matters stage (i.e., fewer dwellings and/or additions of SuDS, as suggested in the current calculator) must be clarified within an updated budget.

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.

After further discussion, it was determined that, for this site, the primary points above could be suitably addressed via plans showing (i) sensitive (e.g., light-sensitive) features, and (ii) enhancement areas. The relevant documents have now been submitted and show an enhancement area fronting the site (to contain two habitat piles), a new species-rich native hedgerow along the eastern boundary, and at least one bat roosting, bird nesting and invertebrate provision per dwelling. The enhancement plan states that all new planting will be wildlife-attracting and native. Furthermore, the mitigation plan states that the hedgerow boundary will not be directly illuminated, with at least a 15m buffer from the proposed dwellings, and includes some details of construction-related precautions for wildlife. These plans are welcomed, should be adhered to, and secured via a compliance condition. Details of proposed lighting should be submitted at the reserved matters stage.

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 also include precautionary measures to ensure that nearby habitats are protected from noise, light, run-off and dust pollution (e.g., hedgerow, and Cannimore Stream 10m to the south). 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. It is recommended that all details of biodiversity enhancements – including locations and specifications – are provided at the reserved matters stage. These should remain in line with the submitted enhancement plan.

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)	0.33 Habitat units
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biodiversity value	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.

NB. There is a watercourse close to the site (Cannimore Stream) which appears to be ~10m from the nearest point of the red line boundary. Any works within the riparian zone (10m) must be assessed within the BNG metric. At the reserved matters stage, should the red line boundary change, or any encroachment into the riparian zone be proposed, the BNG metric will need to be updated. It is also noted that Appendix 5 of the Preliminary Ecological Appraisal shows a blue line boundary (for a “BNG area”) that encroaches the riparian zone. The baseline values estimated for this area must include a watercourse baseline; this is ultimately a post-determination matter, but it may be helpful for the applicant to provide this information at the reserved matters stage.

~~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.~~

1. Compliance with submitted documents

The development will be carried out in [strict](#) accordance with the following documents:

- Section 6 of the Preliminary Ecological Appraisal, Ecologic, August 2025
- Mitigation and Constraints Plan, Ecologic, February 2026
- Compensation and Enhancement Plan, Ecologic, February 2026

REASON: For the avoidance of doubt and for the protection, mitigation and enhancement of biodiversity.

2. River Avon Phosphorus Mitigation

The development hereby permitted shall not commence until evidence of compliance to the Wiltshire Council River Avon Special Area of Conservation Mitigation scheme, or an alternative approved mitigation package addressing the additional nutrient input arising from the development, has been submitted to, and approved in writing by the Local Planning Authority.

Reason: To accord with the Conservation of Habitats and Species Regulations 2017, and Wiltshire Core Strategy Core Policy 69.

3. Water Efficiency in River Avon Catchments

The overnight development hereby approved shall be designed to ensure it does not exceed 110 litres per person per day water consumption levels (which includes external water usage) and a

water efficiency assessment should be submitted. Before the development is brought into use, a water efficiency report certifying that this standard has been achieved shall be submitted to the local planning authority for its written approval.

REASON: To ensure compliance with the prevailing mitigation strategy for nutrient neutrality in the water catchment within which this development is located.

A water efficiency calculation will be needed to discharge this condition. For guidance on how to do this and what is required, please refer to the following document: '*The Building Regulations 2010 – Sanitation, hot water safety and water efficiency*', Appendix A (p36-44).

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/504207/BR_PDF_AD_G_2015_with_2016_amendments.pdf

4. Construction Method Statement

No development shall commence on site (including any vegetation removal or works to existing structures), until a Construction Method Statement has been submitted to, and approved in writing by the Local Planning Authority. The Construction Method Statement shall include all precautionary measures to be implemented during the construction period, for the protection of sensitive habitats and species known to be present within or adjacent the site, with particular reference to bats, nesting birds, badgers, amphibians and reptiles, as well as the adjacent hedgerow and Cannimore Stream. The development shall be carried out in strict accordance with the approved Construction Method Statement.

REASON: To ensure adequate protection, mitigation and compensation for protected species and priority habitats throughout the construction period.

INFORMATIVE – Hampshire Avon Phosphorus Mitigation

Evidence of compliance to the Wiltshire Council River Avon Special Area of Conservation Mitigation Scheme means the certificate of allocation of credits and confirmation of financial contribution to the scheme. Any alternative mitigation package must be approved by the local planning authority and Natural England with evidence of allocation to the scheme.

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

Ecologist Abi Gazzard	Date 16/02/2026
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